

DAERA MARINE & FISHERIES DIVISION

10 FEB 2020

RECEIVED

Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building, Cromac Avenue,  
Belfast,  
BT7 2JA.

4<sup>th</sup> February 2020

Dear Sir / Madam,

Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime, I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

Firstly, there is unquestionably no reason to justify the need for 7 gas caverns in Larne Lough and pumping a repulsive amount of poisonous brine out in to our beautiful marine which we

are extremely lucky to enjoy. Instead of relishing in this beauty, you will be creating a benthic dead zone if this barbaric construction was to proceed, submitting to the greed of shareholders. The Gobbins, Muck Isle and The Maidens are Areas of Specific Scientific Interest of which this storage project will greatly disturb and threaten any scientific discoveries.

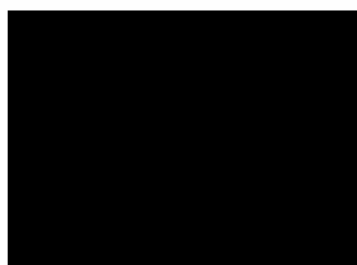
Secondly, the Gas Cavern storage project greatly threatens the wildlife surrounding Islandmagee, home to Harbour Porpoise, Seals, Sea Otters, Puffins, dolphins and more. The project will cause long term detriment and displacement of these protected species of which we are unbelievably lucky to have. The project will cause indefinite death to many sea-life and prey species therefore impacting on the natural food chain as well as the threat to many sea birds and their feeding grounds.

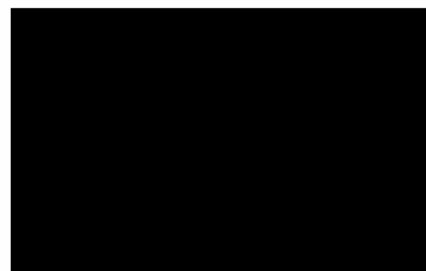
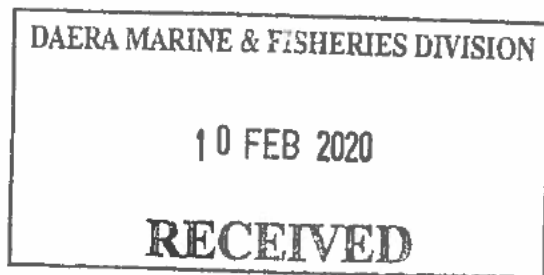
Thirdly, there will be a huge impact on people. Islandmagee is a booming natural tourist attraction and should therefore be protected and preserved. Thousands of international tourists come to the island to delight in the rich abundance of biodiversity found which is currently found here. This project will have a profound negative impact on tourism, the Gobbins Project, local industry, fishermen, lobster fishermen, all of which provides employment to many local residents. I greatly believe we need to save the area and wildlife for future generations of whom we are trying to teach the importance of looking after our environment.

Finally, Islandmagee is the reason why I moved to Northern Ireland. 2 years ago I came with my partner on a holiday and just fell in love with Browns Bay, Ferris Bay, Portmuck and the Gobbins. We stayed outside for hours just watching the wildlife and making friends with the local residents. A year later we relocated from London to Northern Ireland because of this and we are now waiting for our perfect home to purchase on or close by Islandmagee.

Please do not destroy this beautiful area for the unnecessary need of Gas Caverns. I left London to escape all the pollution which surrounds it to come and enjoy a place of natural beauty for me and hopefully my future children.

Kind regards,





Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

5<sup>th</sup> February 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

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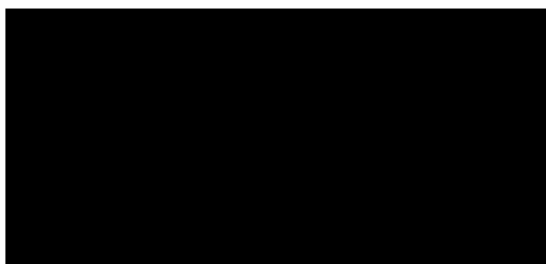
I live in very close proximity to this proposed project. What concerns me most is the location of these caverns. I would like to request where I can find a detailed drawing of the exact

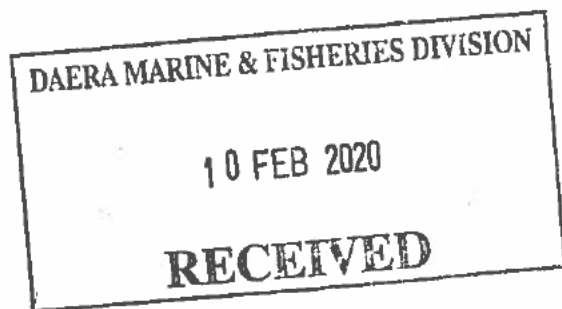
location of the caverns, Islandmagee Energy/Infrastrata states that they could be located under land.

I am also concerned about the safety of such a vast project. On the 18<sup>th</sup> December 19 and as recently as 26<sup>th</sup> January this year there were reported earthquakes off Rathlin and Ballycastle.

I would like to also request a copy of any HSENI responses to Islandmagee Energy/Infrastrata during the consultation stage.

I look forward to hearing from you..





Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

5<sup>th</sup> February 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

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In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons –

I live in very close proximity to this proposed project. I would like to know where exactly these vast caverns will be located. I would like to request an exact drawing of the proposed location as I believe some could be located under land.

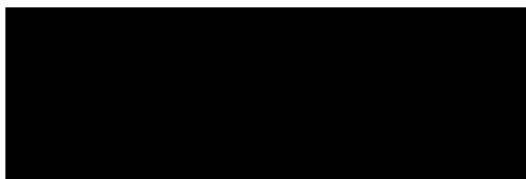
As the Environmental Statement has been amended, where is it possible to view what aspects have changed? Is it possible to request the amended copy?

I am also very concerned about the underwater noise levels. On reading the documents I see the rock excavation could reach 179DB. As harbour porpoise are affected by levels above 173DB, this is unacceptable. When doing my own research I discovered that levels above 140DB produce a risk of lethal injury to mammals and fish.

I feel this is an unnecessary project, with the potential to cause destruction and harm to the environment.

I look forward to your response.

Kind regards





DAERA MARINE & FISHERIES DIVISION

10 FEB 2020

RECEIVED

Marine Licensing Team  
Marine and Fisheries Division  
Department of Agriculture, Environment and Rural Affairs  
1st Floor  
Klondyke Building  
Cromac Avenue  
Belfast, BT7 2JA

7 February 2020

**Ref: Public Consultation - Islandmagee Energy Marine Construction Licence ML 28 12**

We are writing to outline the Alliance Party's opposition to the planned gas storage facility at Islandmagee. The party believes that the environmental risks posed by the project are unacceptable, especially considering the project's limited economic benefit to the surrounding area.

Recently, the Alliance Party Council adopted a policy of opposition to the Islandmagee facility. The Party Council is Alliance's main policy making mechanism and is constituted of representatives from all of the local associations of the Party. This policy was adopted by the Council delegates after listening to the objections of local residents and careful consideration of the available evidence.

Alliance's concerns centre around the location of the site, and particularly the hypersaline solution output. The discharge will be directly into a zone designated as a Special Area of Conservation (SAC) as has been identified as an important habitat for harbour porpoise. The wider area of Larne Lough has already been designated as Special Protection Area (SPA) and a Ramsar site. There are also three Areas of Special Scientific Interest (ASSIs) in close proximity to the project site. Finally, the site lies within the boundaries of the proposed East Coast SPA. These levels of protection are justified due to the area's rich natural biodiversity, with protections put in place to protect a number of local species.

Our party's policy is consistent with the concerns expressed by a number of NGOs involved in nature conservation and environmental issues. In particular, we would encourage DAERA to carefully consider the objections expressed by Northern Ireland Marine Task Force (NIMTF), an umbrella organisation representing a number of leading conservation organisations. It is clear from NIMTF's consultation response, and of their partner organisations, that expert environmental opinion is overwhelming opposed to this project.

Alliance, therefore, shares local residents concerns that the project poses a serious threat to the local marine and bird life and could have a significant impact on the area's eco-system. The Party recognises the measures that the developers have planned to mitigate the risk posed by the project. Nevertheless, we believe the potential damage is unacceptable due to the biodiversity in the area. Granting a licence to this project simply runs contrary to the Department's attempts to protect and enhance the natural biodiversity of this area.

These environmental concerns are exacerbated by the lack of economic benefits associated with the project. The facility will provide few advantages to the Islandmagee area. It will not provide increased sustained employment for the area nor result in increased custom for local businesses. Therefore, the risk of local environmental derogation is too high for extremely limited potential benefits.

In conclusion, having listened to the concerns of local residents, including the concerns on how the project may affect tourism, the use of Larne Lough for outdoor sports and the impact on the local fishing industry, Alliance believes these concerns demonstrate why this licence application should be rejected. Our opinion is the Islandmagee Gas Cavern project poses an unacceptable risk to the area's environment. The area concerned is designated under various levels of protection. Moreover, the predicted economic benefits of the project are insufficient to convince us that these will outweigh the risk of damage to the local environment. Furthermore, local residents are almost universally opposed to the project.

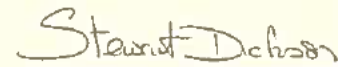
It is for the reasons outlined above, that we are of the opinion that DAERA should not grant a Marine Construction Licence to Islandmagee Energy for this project.

Yours faithfully,



**John Blair MLA**

*Alliance Party  
Spokesperson for Agriculture, Environment and  
Rural Affairs*



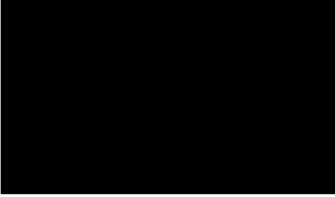
**Stewart Dickson MLA**

*Alliance Party  
East Antrim*

**John Blair MLA**  
Unit 2, 21 Carnmoney Road  
Newtownabbey  
BT36 6HL  
john.blair@mla.niassembly.gov.uk  
tel: (028) 9084 0930  
@johnblairmla

**Stewart Dickson MLA**  
8 West Street  
Carrickfergus  
BT38 7AR  
stewart.dickson@mla.niassembly.gov.uk  
tel: 028 9335 0286





Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

20<sup>th</sup> February 2020

Dear Sir/Madam

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

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As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

This project will have a huge negative effect on tourism in Islandmagee. The Gobbins visitor attraction has brought thousands of tourists and the cliff path walk is greatly enhanced by the presence of birds such as puffins and marine mammals such as harbour porpoise which will be displaced due to the impact on the sea from the hyper saline brine discharged a short distance away.

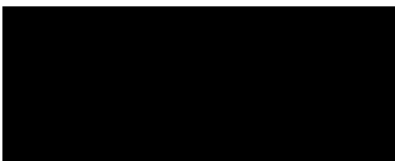
The UK is currently encouraging the move to less reliance on fossil fuels – therefore to grant a licence to a project which is in stark contrast to this stance is unjustifiable. I can find nothing in the Public Consultation documents which shows any effort has been made to address climate change issues.


The updated environmental surveys carried out in 2019 are very limited. Original surveys which I would think should be updated eg: baseline salinity, haven't been done and are severely out of date. Can you explain this please?

I am also concerned that the seismic surveys may not have been accurately interpreted regarding the suitability of the salt strata. I am aware that data obtained for this company's previous project at Woodburn Forest in Carrickfergus proved to be completely inaccurate. Has DAERA had the raw data analysed in order to confirm the company's interpretation of the data is correct?

I look forward to receiving your reply.

Yours faithfully





Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue, Belfast,  
BT7 2JA

Email: [Marinelicensingteam@daera-ni.gov.uk](mailto:Marinelicensingteam@daera-ni.gov.uk)

11th March, 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata PLC, for the proposal to create 7 underground caverns by solution mining below Larne Lough / Islandmagee, for the storage of natural gas, I have taken advantage of the extended consultation period to properly review all the reports which have been submitted for the Departments inspection.

Being a member of the public with no background in Marine Engineering, I am having difficulty understanding what exactly has been applied for, what will be the subject of further licensing? And where exactly will this all take place?

The submitted report for this application is in itself very vague as I see a reference in the application document stating the caverns being located under the land rather than below Larne Lough, I would like to know which caverns will be located under the land, and where is that land located, (Grid References) and which caverns will be located under Larne Lough, and where exactly under Larne Lough will these caverns be located, again Grid References. The application itself states "the exact location is as yet unknown". My question here is, does anybody know? If not, how can the Department even consider this application when so much vital criteria is unknown, including the exact cubic capacity of the caverns, and the exact depth the caverns will be underground, as this seems to range from 1350m to 1500m below sea level, but the application refers to 1700m, all very unclear.

The accompanying plan attached to the application is not very clear by way of it has no scale, no North indication, no identifiable landmarks from which to ascertain even a general location, also, again, no Grid Reference for the location of the caverns. The advertisement published in the Belfast Telegraph concerning this application simply refers to Larne Lough, Islandmagee and Castle Robin; it does not include the dSAC for Harbour Porpoise or the ASSI Portmuck or ASSI Gobbins all of which will be affected by this project.

There seems to be three different construction methods mentioned in this application, surely there should be one clearly defined construction method. Do the designers have a definitive plan? Who will take full overall responsibility for the lifetime maintenance of the caverns once Islandmagee Energy Ltd have finished with them and they are no longer of commercial benefit to them? I can see no clear programme for the decommissioning of these caverns, what is the precise plan for this?

This application should either be refused or the applicant should be asked to submit further information and a fresh application.

Thank you for your attention on this matter and I look forward to receiving your response at your earliest convenience.



DAERA MARINE & FISHERIES DIVISION

23 MAR 2020

RECEIVED

16<sup>th</sup> March 2020

Marine Licensing Team  
Marine and Fisheries Division  
Department of Agriculture, Environment and Rural Affairs  
1<sup>st</sup> Floor Klondyke Building  
Cromac Avenue  
Belfast BT7 2JA

Dear Sir/Madam

**RE: Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining.**

Due to the public consultation period having been extended and having had more time to study the documentation submitted by Infrastrata, I wish to make the following more detailed objections:

#### **Procedural Issues**

1. No updated non-technical environmental impact summary has been submitted for the public to read and easily understand. Given the huge impact that this proposed project will have on the roads and marine environment in Islandmagee this is not acceptable. The environmental information which accompanies the application is spread over six separate documents. The non-technical summary relates only to an Environmental Statement produced in 2010. This is outdated and contrary to the legal requirements for EIA.
2. Exact location of the gas caverns? There is no chart, plan or map showing exactly where the caverns will be located. It is mentioned in the application document that the caverns may be drilled under the land rather than under the Lough, where exactly will this be? Will they be under the water or under the land? This is a requirement of regulation 12(1) of the Marine Works (EIA) Regulations and is therefore a serious omission especially in terms of how it could affect homes and property.
3. The applicant is requesting a license for a 10 year period, yet the Departmental guidance states that licences will only be granted for a maximum of three years? This inconsistency regarding length of time period for licence must be clarified by the Department.

#### **Environmental Concerns**

4. Since fishing is such an important part of our local economy and a legitimate use of the sea, how can this project even be considered in these areas of special scientific interest where

there is such a huge variety of species of sealife and breeding seabirds. As we have seen from the responses from the NI Marine Task Force and RSPB, the environmental information presented by Infrastrata confirms that this project will greatly adversely impact Portmuck and the Gobbins habitats and this cannot be denied or minimised. It is quite simply not acceptable in my opinion.

5. The applicant has not included any consideration of Portmuck ASSI or The Gobbins ASSI in their assessment of impact to designated sites. This again shows how outdated the application is given how important Tourism is to our local economy and the importance of the Gobbins Cliff top path providing the opportunity to see rare birds and other sea life. Again this is a legitimate use of our sea and the Gas Caverns project is totally incompatible with this.
6. Previous earthquakes in Larne Lough have not been mentioned nor has the impact of underwater noise and vibration from the drilling of the proposed caverns. Given the history of Larne Lough and the fact that it was formed as a result of a geological fault line this is an issue which must be seriously considered in terms of safety of residents and property.

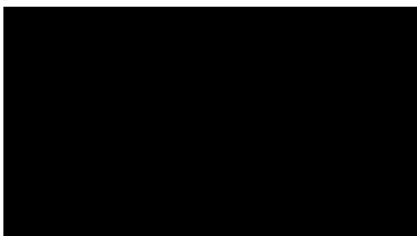
Infrastrata cannot guarantee that this drilling will not produce earth tremors or destabilise the structures of peoples homes in Islandmagee. No recognition of or willingness to address or reassure residents regarding these very legitimate concerns has been offered by the Company to my knowledge.

I have listed just some of the reasons why this project should not be allowed to proceed in Islandmagee. There are no doubt many other areas of concern. This project has nothing to offer our Community except destruction and displacement of wildlife. I honestly cannot see any benefits that it can bring to our unique peninsula and for that reason it should not be granted a marine license.

I hope you will take all these points into consideration. At the public consultation sessions I was not at all impressed with representatives of the applicant who displayed no willingness whatsoever to discuss residents' concerns and the information they provided appeared very basic and out of date.

I would be very grateful if you would acknowledge receipt of this letter.

Yours sincerely



DAERA MARINE & FISHERIES DIVISION

23 MAR 2020

RECEIVED

20<sup>th</sup> March, 2020

Marine Licensing Team  
Marine Fisheries Division  
Klondyke Building  
Cromac Avenue  
Malone Lower  
BELFAST  
BT7 2JA.

Dear Sir / Madam

Re: Proposed Gas Cavens at Islandmagee.

Further to my previous letter, I would like to add the following points, some of which I have addressed before.

1. There does not seem to be any plan or map showing where exactly the cavens would be located and possibility of being under land.
2. No actual description although references made to "detailed design phase".
3. Discrepancy in how long the licence is for. Application for 10 year period but application form states it would be granted for a maximum of 3 years. Need clarification if 3yrs or 10yrs.
4. No updated Environmental Statement since 2010. Lodgment is contrary to legal requirements for EIA.
5. Discrepancy in information eg Leaching of Caven.
6. Not enough information to make informed & reasoned comments.
7. Detailed design work has not appeared.
8. A detailed Construction Method Statement with application so Department & public can understand proposal and its construction and an Environmental Impact Assessment can be carried out.

9. The design for brine outfall and intake pipe as described in Construction Method Statement does not match assessment in Marine Environmental Conditions update and needs to be closely looked at and require the Applicant for further environmental information.
10. The impact of brine discharge on fish, plankton, shellfish and other habitat. The adverse impact does not seem to be considered specifically in species at Portmuck and Lobbins and will possibly be detrimental to the Tourist industry and local economy.
11. A threat to grey seals, harbour porpoise and fish.
12. That will, in turn, affect the bird population. The survey is inadequate and were not carried out at the appropriate time of year to obtain an accurate record of usings of the site by foraging seabirds. The link between ecosystem such as fish and foraging birds has not been addressed.
13. Previous surveys are out of date and should not be considered.
14. The impact of underwater noise and vibration from the formation of caverns in Lame Lough has not been assessed.
15. The brine dispersion model has not taken storm surges into account.

The application documents do not meet the requirements of the EIA Directive or Habitats Directive. The applicant should be required to submit further environmental information and a fresh application or it should preferably be refused as it is not a good thing for Islandmagee and surrounding areas.

Yours faithfully





23 March 2020

BY POST AND E-MAIL

MarineLicensingTeam@daera-ni.gov.uk

Marine Licensing Team  
Marine and Fisheries Division  
Department of Agriculture, Environment and Rural Affairs  
1st Floor Klondyke Building  
Cromac Avenue  
Belfast  
BT7 2JA

Dear Sirs

**Islandmagee Energy Limited – Marine Licence Public Consultation: ML 28\_12**

I refer to previous correspondence in relation to the Public Consultation and wish to raise the following further queries/observations:

I dispute the Applicant's determination that this project would have "minor" impact on the marine habitat. The Applicant has failed to conduct a full updated environmental assessment. As mentioned in my objection letter of 3<sup>rd</sup> February 2020, a total of only 18 hours, conducted between July and September 2019 cannot be deemed sufficient for the purposes of determining a Marine Licence. Furthermore, the Applicant's original Ornithological Survey was undertaken as per Joint Nature Conservation Committee methodology; the updated survey does not appear to have followed the same criteria. The original survey area for seabirds extended from Skernaghan Point to Portmuck and was conducted over a longer period of time. In addition, the Applicant's updated Environmental Assessment has failed to address the adverse impact the project would have on The Gobbins ASSI.

The Applicant has failed to fully assess the adverse impact caused by creation of the storage caverns in Larne Lough. I am unable to find updated assessments for this area. Both the above-ground construction works and formation of the caverns would adversely affect the marine environment yet vibration and underwater noise impacts have not been fully addressed.

The Applicant has failed to include the proposed East Coast (Northern Ireland) SPA in its updated environmental assessments. As acknowledged by DAERA: *"The proposed East Coast (Northern Ireland) Marine SPA recognises the contribution made by this wider coastal and marine area to meet the foraging requirements of breeding Terns in adjoining colonies, in the areas already designated as SPAs, for Manx Shearwater, which breed on the Copeland Islands, but use a much larger marine area around the islands for their 'rafting' requirements, and for a significant non-breeding population of Red-throated Diver on Belfast Lough together with non-breeding populations of Great Crested Grebe and Eider Duck."*

It is therefore vital to recognise that the Applicant's project would adversely affect a much larger area than just the immediate area surrounding the brine discharge site and should be addressed within their application.

Many aspects of the application require further assessment following detailed design work being carried out. I have raised this issue separately, but would reiterate that, until these unknown details are known, it is impossible for members of the public to fully assess the Applicant's proposal.

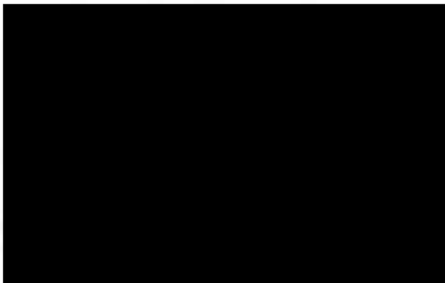
As previously mentioned, the application in its current form is disjointed, fails to clearly set out exactly what is being proposed and therefore does not comply with criteria set out by yourselves in respect of public consultations.

It is my understanding that the Applicant's submitted environmental documentation does not comply with The Habitats Directive nor The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017.

In light of the above points, and previously raised concerns, I would again submit that the Applicant's proposal should be refused. Alternatively, a completely new application should be submitted together with one full set of up-to-date environmental documentation which meets the required standards.

I await hearing from you in this matter.

Yours faithfully



Marine Licensing Team,  
Marine & Fisheries Division, DAERA,  
1st Floor Klondyke Building, Cromac Avenue, Belfast, BT7 2JA

Also by email to  
Marinelicensingteam@daera-ni.gov.uk

23rd March 2020

Islandmagee Energy / Infrastrata - Marine Licence ML28\_12

Dear Sir/Madam

This is my second extensive objection letter to this project. I wish to raise the following further points as well as those mentioned in my prior objection.

It has recently been noted that the largest habitat for the Common Lizard has now been recorded at Blackhead Point. This is not a common species regardless of it's name and the location is now under request for Protections for the habitat and the species.

This is not a huge distance away from Islandmagee, where a second smaller population has been observed on the cliffs near the Gobbins. I raise this in concern that vibration from any extraction, construction, pollution, or other works associated could adversely affect the habitat of this sensitive and delicate species and its habitat.

I also wish to remind the Department that this whole geological area is somewhat unstable. There have been minor earthquakes along the Antrim coastline in recent years. And there have been land based collapse of the roads, and the rerouting of another road because of extensive mining in the salt layer - the same salt layer this company wishes to place large gas caverns in. The land based mining is very extensive and comes at least as far as Ballycarry.

This brings me to a risk [as yet unquantified] of gas leaking into the existing land based excavations. This must be explored, and full maps of existing excavations compared with appropriate safe distances for the proposed gas caverns.

I also have concerns over the following omissions and/or vague statements and wish to bring them to your attention.

The consultation process appears to be flawed as there is insufficient and poorly stated information, so it makes it difficult to analyse and make informed and reasonable comment. However, I have done my best to find and describe my further concerns.

There are no less than SIX separate documents, containing the Environmental Information. Going through all this, I can find a non-technical summary which relates to an Environmental Statement made in 2010. Clearly this is outdated; I cannot find an updated environmental statement with an updated non-technical summary. My understanding is - this is contrary to the legal requirement for an Environmental Impact Assessment.

The phasing for the leaching of the caverns is different, therefore it does not assess or reflect what is proposed in the application documents of Environmental Information.

The explanatory note accompanying the application states that the licence will be granted for a maximum period of three years. However, the application is requesting a ten year licence period. One of these is incorrect - Perhaps the Department can clarify whether the licence is for three years or for ten years.

There are numerous references to information which will be available after a 'detailed design phase' but actual information on the detail of the design is unavailable, missing, or simply not included at all. So, it is difficult to understand what are the licensed elements of the project - there is no plan. It is impossible to regulate, inform or consider a project with such scant information.

I would like to see, visualise and know exactly where each individual cavern is to be situated. There is no map or chart.

What are the distances between them?

Are they under the sea?

Are they under land?

Are they under both?

What precautions are taken to ensure the safety of the sites, the residents business etc if some are under land?

I understand such information is a key issue and should be available under Regulation 12 [1] of the Marine Works [EIA] Regulations.

I can find no full description of the tidal impact for ongoing salt leaching. Will the salt layer lie on the ocean floor becoming evermore toxic? What are the full tidal patterns? Has all the weather condition modelling been completed for all kinds of weather events - from major storms right through to extended becalmed conditions? Without such information, the risks to the marine plants, animals and entire environment is incalculable.

I have also recently come across some information from the International Maritime Organisation. As we move towards Brexit - possibly with some delay because of the Covid-19 pandemic - fishing rights become an issue. Directly related to this is UN growing concern for toxins in the sea, particularly in heavily trafficked areas such as the English Channel, the Irish Sea. These toxins threaten all. Marine life. The increase results from tighter regulations on airborne pollution - ship owners and operators can reduce the sulphur content of ships fuel oil by [a] using quality more expensive fuel, or [b] by fitting [open-loop] scrubber systems which flush the sulphurous waste, nitrates, PAH contaminants etc into the sea. It is uncertain if the second option will be prohibited at this point in time.

It is therefore imperative this gas cavern project never proceeds, as this would add even more stress to the marine environment and to the protected species that spawn and live there.

Fishing is an important part of our local economy and is a legitimate use of the sea;

The Environmental Information presented confirms that there will be adverse impacts on a broad range of species;

Table 7-2126 of the Environmental Update Report shows "minor (adverse)" impacts from brine discharge on a broad range of species including fish, plankton, shellfish and benthic subtidal habitat with no mitigation proposed for any of these. While these impacts are considered to be minor, the fact remains that this application will have adverse impacts on a huge range of species within two designated sites.

The applicant has not included Portmuck ASSI or The Gobbins ASSI into their assessment on impacts to designated sites. Both of these sites list breeding seabirds within their qualifying features and include Razorbill, Guillemot and Kittiwake among others. Both sites are functionally linked to the proposed discharge area. The omission of any assessment of the potential impacts on the Gobbins ASSI is particularly striking given the importance of the Gobbins cliff top path. A key feature of the cliff top path is

the opportunity to see rare seabirds and other sea life. Tourism is an important and legitimate use of our sea and makes an important contribution to our local economy.

Construction of the seawater intake and brine outfall pipe has the potential to cause a temporary threshold shift and permanent threshold shift to harbour porpoise, to grey seals and to fish which can affect the swim bladder or other gas volumes in the species (this may cause behavioural effects at individual or population level);

The bird survey data presented is woefully inadequate. It is either very outdated or it fails the updated bird surveys of 2019 provided by the applicant. They are of extremely limited value in determining whether there are important bird foraging areas in the vicinity of the brine outfall. These surveys were not carried out at the appropriate time of year to obtain an accurate record of the usage of the site by foraging seabirds. They are carried out when most migrating birds had left for to Winter elsewhere.

Previous surveys carried out for this site are now out of date and cannot be considered as a basis for determining whether the proposed discharge site is of importance to foraging seabirds.

The link between vital ecosystem components such as fish and foraging birds has been omitted.

The impact of underwater noise and vibration from the formation of the caverns under Larne Lough has not been assessed. The effects of this on cetaceans, and diving birds, as well as threatened species such as the Common Skate have not been considered at all.

The brine dispersion model does not accounted for storm surges - we had a series of major storms in early 2020.

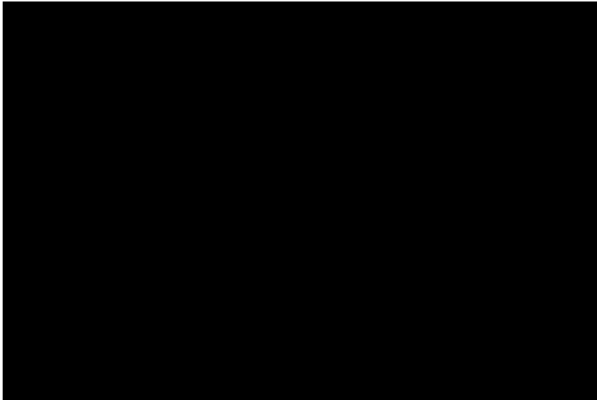
For the above reasons the application documents do not meet the requirements of the EIA Directive or the Habitats Directive.

I believe this application should be refused, or the applicant should be required to submit a fresh application.

Adding these objections to those in my prior objection, I believe this application is invalid.

I believe this application does not comply with the legal requirements of an Environmental Assessment.

Yours truly





18th March 2020

Marine Licensing Team  
Marine and Fisheries Division  
Department of Agriculture, Environment and Rural Affairs  
1<sup>st</sup> Floor Klondyke Building  
Cromac Avenue  
Belfast BT7 2JA

Dear Sir/Madam

**RE: Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining.**

Having had an opportunity to read in more detail the information accompanying the above application submitted by Infrastrata as a result of the extended public consultation period, I wish to make the following more detailed objections:

### **Environmental concerns**

1. Fishing is an important part of our local economy and is a legitimate use of the sea. As we have seen from the recent responses from the NI Marine Task Force and RSPB, the environmental information presented by Infrastrata confirms that this project will very much adversely impact a broad range of species of fish, sea creatures and birds and their breeding grounds in this designated area. This is not acceptable and the dumping of this poisonous brine does not constitute a legitimate use of the sea in my opinion.
2. The applicant has not included any consideration of Portmuck or The Gobbins as Areas of Special Scientific Interest in their assessment of impact to designated sites. This again shows how outdated the application is given how important Tourism is to our local economy and the importance of the Gobbins Cliff top path providing the opportunity to see rare birds and other sea life. Again this is a legitimate use of our sea and the Gas Caverns project is totally incompatible with this. We are so privileged here to enjoy seeing puffins and harbour porpoise in their natural habitats.
3. Seismic activity in Larne Lough has not been addressed nor has the impact of underwater noise and vibration from the drilling of the caverns. Given the history of Larne Lough and the fact that it was formed as a result of a geological fault line this is a serious omission in terms of safety of residents and property. There are no guarantees that this drilling will not produce earth tremors and destabilise the structures of our homes on the peninsula.



Infrastrata has offered no acknowledgement of or willingness to address or reassure residents regarding these very legitimate concerns.

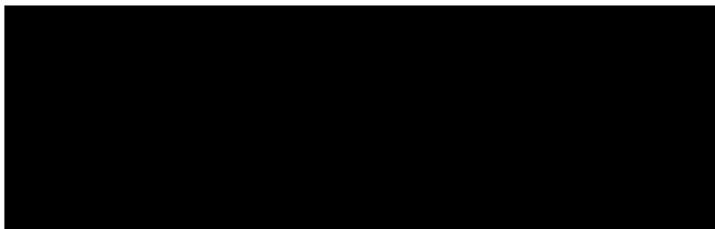
### **Procedural Issues**

1. There is no updated non-technical environmental impact summary for the public to read and easily understand. I find it hard to make sense of what they have submitted and fail to see how they can expect other residents to understand it. This is a major failing given the huge impact that this proposed project will have on the roads and marine environment in Islandmagee and on our homes.
2. Where exactly will the gas caverns be located? There are no grid references and no scale in the vague plan which is attached. It is mentioned in the application document that the caverns may be drilled under the land rather than under the Lough, where exactly will this be and how will it affect people's homes?
3. The application requests a license for a 10 year period, yet the Departmental guidance states that licences will only be granted for a maximum of three years? This inconsistency regarding length of time must be clarified by the Department.

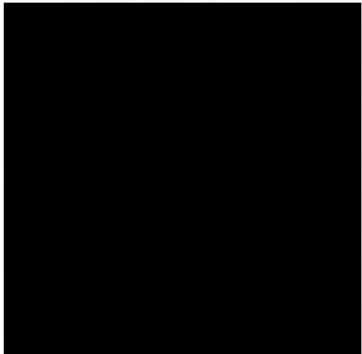
These are just some of the reasons which stand out to me as to why this project should not be allowed to proceed in Islandmagee. There are many more technical and engineering issues. This project has nothing to offer in terms of promoting good health and wellbeing or protection of the environment; in fact totally the opposite, it can only be destructive to our beaches and marine life and for that reason should not be granted a marine license.

I trust you will take all these matters into consideration as at the public consultation sessions the representatives of the applicant showed no desire whatsoever to discuss residents' concerns. This project is outdated and unnecessary.

I would be grateful if you would acknowledge receipt of this letter.



DAERA MARINE & FISHERIES DIVISION  
24 FEB 2020  
RECEIVED



Marine Licensing Team  
Marine and Fisheries Division  
Department of Agriculture, Environment and Rural Affairs  
1<sup>st</sup> Floor Klondyke Building  
Cromac Avenue  
Belfast  
BT7 2JA

20 February 2020

Dear Sir/Madam

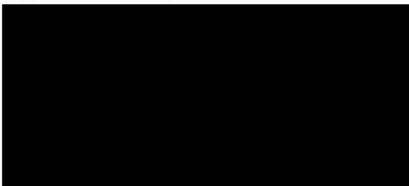
**Ref: Islandmagee Energy Marine Licence Consultation ML 28 12 objection letter sent 15 January 2020, via Royal Mail "signed for" ref: KX 00988817 2GB**

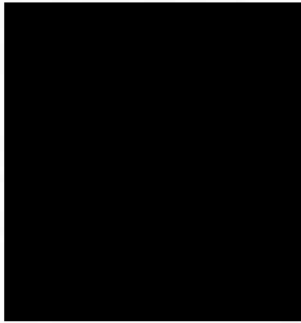
Following on from my letter dated the 14 January which I have attached, I have had no correspondence regarding this being received.

I am also very concerned that the public consultation has been extended until March, to appease the Islandmagee Energy Company.

As a member of the public with serious concerns I still believe there should be a public enquiry.

I look forward to hearing from you and also letting me know why this has been extended.





Marine Licensing Team  
Marine and Fisheries Division  
Department of Agriculture, Environment and Rural Affairs  
1st Floor Klondyke Building  
Cromac Avenue  
Belfast  
BT7 2JA

marinelicensingteam@daera-ni.gov.uk

14 January 2020

Dear Sir/Madam

**Ref: Islandmagee Energy Marine Licence Consultation ML 28 12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy/Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime, I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

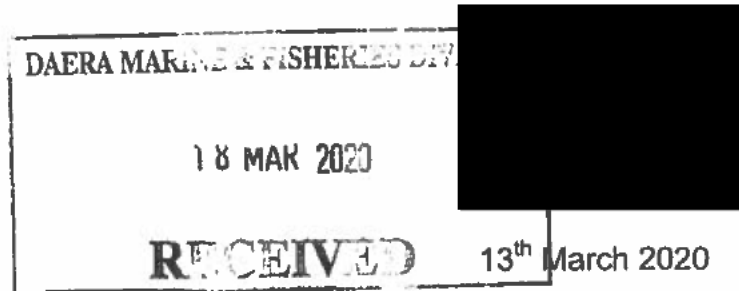
I object to this scheme as it is not needed and would have a negative impact on the sea life in the surrounding area there are migrating birds return to this area every year to feed and if the sea water in the area is damaged these birds will be affected.

Also, the tourism in this area is excellent and the amount of work lorries and equipment will have a negative impact on the area.

There have been negative reports on other gas caverns in the UK surrounding the long-term safety they have on the surrounding area, and with the collapse of the salt mine a few years ago in Carrickfergus this is very worrying if the same thing were to happen again.



**Objection to Islandmagee Energy / Infrastrata Marine Licence Application**



Dear Sirs

Your reference: ML 28\_12

Thank you for your correspondence in which you advise of the extension to the public consultation regarding the above application for a Marine Licence for works at Islandmagee.

I note you mention it is not necessary to make a further response, however, I would like to use the extended consultation period to seek clarity on several issues of interest to me as a concerned resident.

Please advise if the licence is granted, will it be for 3 or 10 years? The application document states that licences are generally not granted for more than 3 years, yet the applicant states that the works are likely to continue for 10 years – can you confirm whether the Department is considering granting a licence for 3 years to allow the exploratory works to prepare a detailed design or whether the Department is considering granting a licence which would permit both the exploratory works and a subsequent detailed design without further environmental assessment ?

Where exactly will the caverns be located? The Marine Construction Licence Application December 2019 (page 2, explanatory note 6) emphasises that “it is important that the correct positions are included with this application, as any errors may result in the application being refused or delayed”. However, I note on page 12 of the application that “the IGR for the individual caverns will be determined during the detailed design phase of the project and consequently is not yet available” Please explain why this document was released for public consultation when it clearly falls outside the Department’s guidelines.

In my original response in February you will have noted my concerns regarding the potential impact of this proposal on the legally protected harbour porpoise. I was encouraged to see the comprehensive representation submitted by the experts in the NI Marine Task Force.

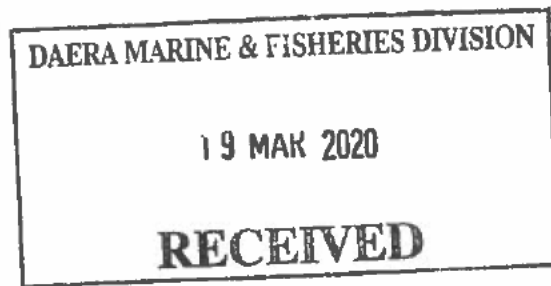
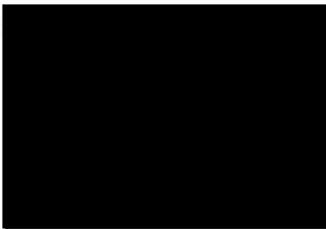
I would like to draw your attention in particular to their comments: "The Natura 2000 data sheet 8, states that for harbour porpoise the North Channel SAC *"is considered to be one of the best areas in the United Kingdom"*. As such, it is unacceptable to allow levels of noise capable of causing a Temporary Threshold Shift (TTS) and Permanent Threshold Shift (PTS) in harbour porpoise.

The expert opinion is significant "we consider that the risk of permanent injury and displacement of harbour porpoise is not in support of the conservation objectives for the site".

I look forward to receiving clarification on the points I have raised.

Yours faithfully





14<sup>th</sup> March 2020#

Marine Licensing Team  
Marine and Fisheries Division  
Department of Agriculture, Environment and Rural Affairs  
1<sup>st</sup> Floor Klondyke Building  
Cromac Avenue  
Belfast BT7 2JA

Dear Sir/Madam

**RE: Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining.**

Having had more time to read and digest the documentation submitted by Infrastrata as a result of the extended public consultation period, I wish to make the following observations regarding procedural issues:

1. There is no updated non-technical environmental impact summary for the public to read and easily understand. As an educated person if I find it hard to make sense of what they have submitted how can they expect ordinary men and women in the street to understand it. This is a major failing given the huge impact that this proposed project will have on the roads and marine environment in Islandmagee.
2. Where exactly will the gas caverns be located? There are no grid references and no scale in the vague plan which is attached. It is mentioned in the application document that the caverns may be drilled under the land rather than under the Lough, where exactly will this be and how will it affect people's homes?
3. The application requests a license for a 10 year period, yet the Departmental guidance states that licences will only be granted for a maximum of three years? This inconsistency regarding length of time must be clarified by the Department.
4. Fishing is an important part of our local economy and is a legitimate use of the sea. As we have seen from the responses from the NI Marine Task Force and RSPB, the environmental information presented by Infrastrata confirms that this project will greatly adversely impact a broad range of species of fish, sea creatures and birds and their breeding grounds in this designated area. This is not acceptable.

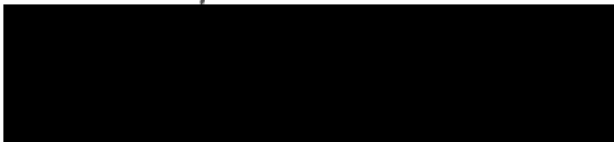
5. The applicant has not included any consideration of Portmuck ASSI or The Gobbins ASSI in their assessment of impact to designated sites. This again shows how outdated the application is given how important Tourism is to our local economy and the importance of the Gobbins Cliff top path providing the opportunity to see rare birds and other sea life. Again this is a legitimate use of our sea and the Gas Caverns project is totally incompatible with this.
  
6. Seismic activity in Larne Lough has not been addressed nor has the impact of underwater noise and vibration from the drilling of the caverns. Given the history of Larne Lough and the fact that it was formed as a result of a geological fault line this is a serious omission in terms of safety of residents and property in my opinion. There are no guarantees that this drilling will not produce earth tremors and destabilise the structures of our homes on the peninsula. Infrastrata has offered no acknowledgement of or willingness to address or reassure residents regarding these very legitimate concerns.

These are just some of the reasons why this project should not be allowed to proceed in Islandmagee. There are many more which I do not have time to address here and now. This project has nothing to offer in terms of health promotion or protection of the environment, in fact totally the opposite, it can only be destructive to our beautiful peninsula and for that reason should not be granted a marine license.

I trust you will take all these points into consideration as at the public consultation sessions representatives of the applicant showed no inclination to discuss residents' concerns and their information was very basic and out of date.

Please acknowledge receipt of this letter.

Yours sincerely





DAERA MARINE & FISHERIES DIVISION

04 FEB 2020

RECEIVED

Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Email: [Marinelicensingteam@daera-ni.gov.uk](mailto:Marinelicensingteam@daera-ni.gov.uk)

January 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

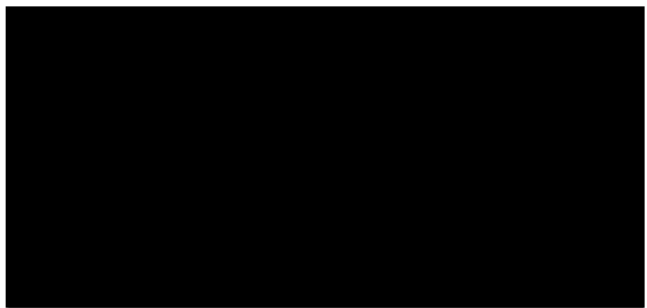
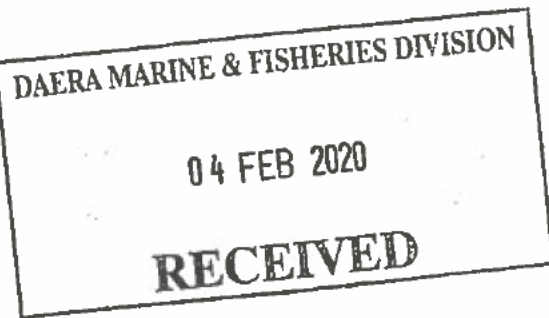
With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

*We have small children we want Islandmagee to stay  
a safe and beautiful place*



Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Email: [Marinelicensingteam@daera-ni.gov.uk](mailto:Marinelicensingteam@daera-ni.gov.uk)

January 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

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In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

*We strongly object to this as it will affect Marine life  
our leisure pursuits fishing boating*

DAERA MARINE & FISHERIES DIVISION

04 FEB 2020

RECEIVED

Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

2 February 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

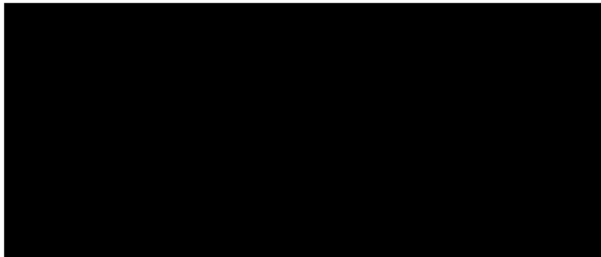
As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

I am a frequent visitor to Islandmagee as I have relatives there. I am passionate and proud of the beauty and reputation of the Antrim Coast, and I strongly object to this proposal to build gas caverns that are not wanted or needed because of the environmental impact. There is no economic need for this project, at a time when we should be reducing our reliance on fossil fuels. The consequences for the flora and fauna of Islandmagee and the coastal waters are unacceptable, and the notion of creating a dead zone in an SAC is completely unacceptable. These areas are to preserve wildlife. We have no right to make exceptions, especially when there is no economic need for gas to be stored on the island of Ireland. This project is not essential and only exists to make shareholders rich.

I have found Infrastrata to be very economic with the truth and facts and found the recent lack of information, or incorrect information about the information days in January was dreadful. They model all their answers, so have no certain information to give anyone peace of mind that there will be anything other than dreadful environmental and potentially economic results when they poison our seas. We will lose the wildlife for which we are famous, they will scar our beautiful coastline, and our increasing tourist industry will be adversely impacted but the construction and results of this project.

Please hand this now to a public inquiry, The risks to the environment and people's health and wellbeing are even greater than they were in 2012.



**Objection to Islandmagee Energy / Infrastrata Marine Licence Application**

DAERA MARINE & FISHERIES DIVISION

04 FEB 2020

RECEIVED

31<sup>st</sup> January 2020

Dear Sir / Madam,

With reference to the Marine Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining.

I would like you to note I found the public consultation documents exceptionally difficult to follow; I have no doubt this put people off examining the details properly. I did read most of the information provided and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation. I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

I wish to object strongly to the issuing of a Marine Licence and raise the following concerns:

Why have out of date documents been presented for public consultation?

The Environmental Statement Non-Technical Summary states the project is "driven by the need to achieve security and maintain flexibility in the UK and Ireland's energy supply" The document states Northern Ireland, at the time of writing, was producing

and consuming 7% of its electricity from renewable sources with a target to achieve 12% of renewable electricity by 2012.

We are now in 2020 and Northern Ireland is already capable of achieving and consuming 70% of its electricity from renewable sources. If we have had an adequate supply of gas in previous years, why do we need gas storage now when so much of our electricity comes from renewable sources?

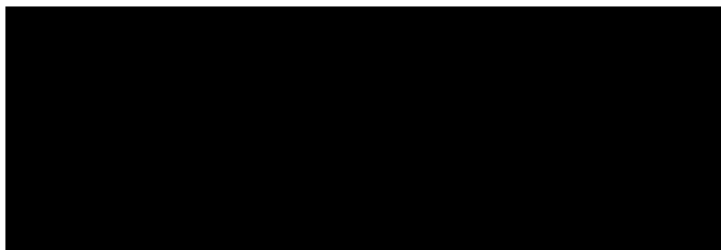
Portugal has just recently achieved 100% electricity production from renewable sources and the UK recently announced electricity from renewables surpassed fossil fuels for the first time.

The above is clear evidence that the world is changing rapidly, the use of fossil fuels is being phased out and in view of this there is a real danger that these enormous caverns will become a stranded gas asset and a burden on the economy.

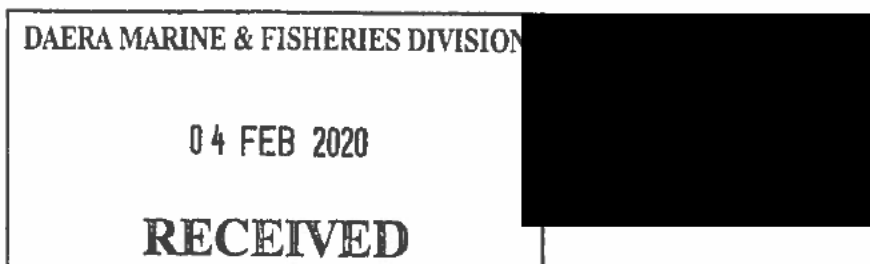
In view of the above it is my opinion that the process to construct the caverns, the operation of the plant, the actual decommissioning and the eternal phase post decommissioning pose a totally unnecessary risk to the environment.

Locking into fossil fuels in an era of climate emergency is bad enough without consenting to the pollution of the North Channel dSAC recently designated for harbour porpoise, disturbance to the Larne Lough SPA, home of the endangered Roseate Tern and blasting to death with hypersaline the protected species on the seabed at the outfall pipe.

In conclusion I believe the proposed project does not meet your criteria of sensible or necessary and I see no reason why the Marine Licence should be granted.



**Objection to Islandmagee Energy / Infrastrata Marine Licence Application**



31<sup>st</sup> January 2020

Dear Sir / Madam,

With reference to the Marine Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining.

It's worth noting I found the public consultation documents exceptionally difficult to follow, nevertheless I have examined the information provided and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation. I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

I wish to object strongly to the issuing of a Marine Licence as per the Public Consultation for the following reasons:

This project is deemed a high risk project by Northern Ireland Health and Safety Executive. The sheer enormity of the caverns which are to be used to store gas in such close proximity to human beings and protected animal/bird areas is unbelievable. The risks would certainly appear to outweigh the benefits.

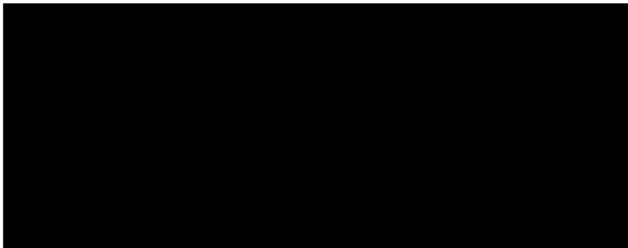
On examining the updated planning application I was surprised to see the following statement in Section 4.11.2.3 Cavern Sealing in reference to the abandonment of the caverns.

"Theoretically, the pressure increase will stop as soon as the internal cavern pressure is equal to the formation pressure of the surrounding rock salt."

Why, if such caverns have been in use all over the world for the number of years the applicant suggests in the project literature, are we still working in theory and not fact? This is a major concern considering the high risk nature of the proposal.

Where do the documents show a detailed decommissioning plan approved by the Northern Ireland Health and Safety Executive and the Crown Estate?

In conclusion I consider the risks of this project have not been adequately assessed and urge you to decline the Marine Licence application.





DAERA MARINE & FISHERIES DIVISION

04 FEB 2020

RECEIVED

Marine Licensing Team  
Marine and Fisheries Division  
Department of Agriculture  
Environment and Rural Affairs  
1<sup>st</sup> Floor Klondyke Building  
Cromac Avenue  
Belfast  
BT7 2JA

3 February 2020

Dear Sir / Madam

With reference to the Marine Construction Licence application 2019 Consultation ML28\_12 by Islandmagee Energy/Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission of the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public enquiry, as under Regulation 17 of the Water Abstraction and Impoundment (Licencing) Regulations (Northern Ireland) 2006, the Department has the power to order a public enquiry for the purpose of evaluation representations made as a result of a public consultation exercise.

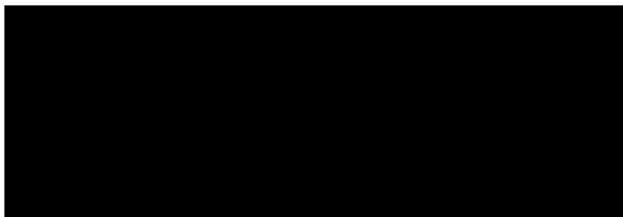
In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

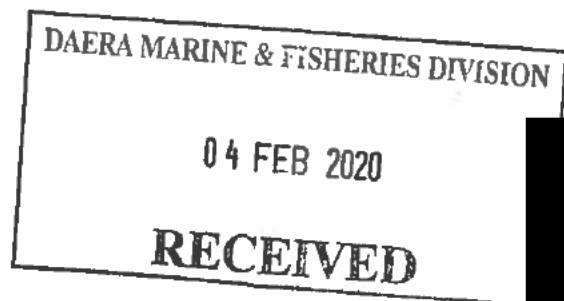
- Discharge of up to 1000m<sup>3</sup> of hypersaline brine per hour per day (24,000m<sup>3</sup> of toxic brine per day) for 4 years into the sea, just 450m from the shore near Castle Robin at Islandmagee, creating a benthic dead zone
- Designated Special Area of Conservation (North Channel dSAC, directly into which the hypersaline brine will be discharged, recently designated for Harbour Porpoise)
- Special Protected Areas: Proposed East Coast (NI) Marine SPA (abstract/discharge area is within the pSAP boundary)
- Larne Lough SPA (with red flagged endangered Roseate Tern a priority species)

- Areas of specific scientific interest (ASSIs: The Gobbins, Muck Isle, The Maidens)
- Only Northern Ireland land based breeding Puffin colony located near to discharge area
- Death of sea-life and prey species (potential impact on the food chain)
- Threat to sea birds and feeding grounds
- Concerns that protected species Porpoise/Otter/Dolphin could be displaced
- Potential impact on leisure pursuits fishing/diving/swimming/boating etc.
- Potential negative impact on tourism/Gobbins project
- Potential impact on local industry fishing/diving
- Construction phase timescale and additional traffic impact/dangers on roads that are neither suited to heavy vehicles or increased volume
- Only a 'skeleton staff' required to operate facilities after construction according to public consultation documents
- No evidence of need for gas storage provided in the public consultation documents
- Serious concerns over safety, now and in the long term (gas leakage, pollution)
- Deemed a high risk project by Northern Ireland Health and Safety Executive.

The north of Islandmagee already houses NI's largest power station and the Moyle Interconnector with pylons and overhead power lines a prominent feature around the area. I have genuine concerns about how this project is going to impact the environment and the natural beauty of the coastline, residents safety, health and wellbeing and growing tourism within the area.

Yours faithfully





Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

3<sup>rd</sup> February 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

I am writing concerning the Marine Licence Application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposed development of underground caverns below Larne Lough for the storage of natural gas. I have examined the public consultation documents and I wish to strongly voice my support to the project and the Marine Construction Licence application.

I understand the need for this project and the role it could play in enhancing the efficiency and sustainability of energy supplies in Northern Ireland, and the unique and innovative way it will store energy. This would ensure security of supply of gas going forward, safeguarding supply if Northern Ireland was to become isolated from the mainland UK.

Also, the project represents a significant and much needed investment in Northern Ireland's energy infrastructure and will bring jobs to the area during its construction and especially the long term during its operation. Local employment is the life blood of the community around the Islandmagee area. This project will help keep young people in the area and bring new people to Islandmagee, therefore positively bringing trade to local shops and clubs. This is clearly important to support the social fabric of this part of Northern Ireland.

As an Islandmagee resident for all of my life I also understand the benefit this project could bring to local groups and organisations through the 1 million pound community fund. This would bring enormous benefits to our local organisations, clubs and groups who struggle for funding and financial survival yet are such a crucial and valuable asset to the local community. The importance of this fund and what it would bring to the local area cannot be overlooked.

Whilst I understand some local residents have environmental concerns, I have total faith in the experts in this field and environmental agencies to ensure everything is done correctly and that any issues to marine life are limited. Having attended the consultation days I have absolutely no concerns about this project causing any long term damage to the environment.

I confirm my full support for the project and the contribution it will make to the Islandmagee area. I support a positive decision from DAERA to approve the marine license for the project.

Yours Sincerely,

DAERA MARINE & FISHERIES DIVISION

04 FEB 2020

RECEIVED

Marine Licensing Team  
Marine and Fisheries Division  
Dept of Agriculture, Environment and Rural Affairs  
1<sup>st</sup> Floor Klondyke Building  
Cromac Avenue  
Belfast  
BT7 2JA

27 January 2020

Dear Sirs

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining; I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns. Also, the environmental impact on land and at sea with the admission by the company of the dead zone in a dSAC, designated for Harbour Porpoise.

In the meantime, I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

Health & Safety

- Deemed a high risk by N.I. Health and Safety Executive
- As a health professional, I would have grave concerns about swimming or paddling in such a toxic hypersaline sea.
- Very serious concerns regarding cavern safety, not only now but in the future.

Financial Impact

- Negative impact on the Gobbins project and revenue – tourist implications as local marine life which can be observed there would be impacted.
- Fishing, locally and further afield

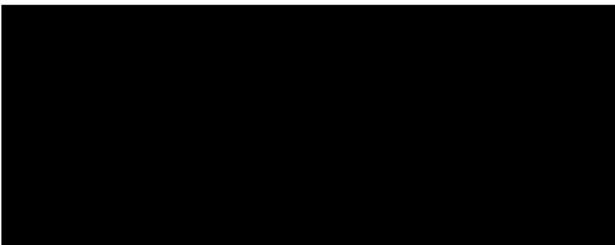
Effects on Marine Life

- High levels of hypersaline toxicity would create a dead zone for many years at best and probably an inability to ever recover.
- Destruction of the endangered Roseate Tern (a priority species) due to contamination of this designated special area of conservation – North Channel, directly into which the hypersaline brine will be discharged.

As a member of the public with serious concerns, I believe there should be a public inquiry, as under Regulation 17 of the *Water Abstraction and Impoundment (licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

I await your response with interest.

Yours faithfully



DAERA MARINE & FISHERIES DIVISION

04 FEB 2020

RECEIVED

Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building, Cromac Avenue,  
Belfast, BT7 2JA

Objection to Islandmagee Energy (infrastrata) Marine licence Application ML28\_12

Dear Sir/Madam

I have read through the supporting documents and wish to file an objection to the proposed Marine Licence submitted by Islandmagee Energy. The Government has now made a commitment to phasing out the use of Fossil Fuels which makes the need to store gas for profit an unnecessary damaging industry. Also the public consultation document does not indicate any need for gas storage in NI.

I also object to the proposed dead zone which will be created during the formation of the salt caverns. This area of coastline is rich in marine life including sea birds that rely on the area for their food supply. This area is also a designated SPA, recently designated for Harbour Porpoise and I believe the proposal will have an adverse effect on the harbour porpoise. The nearby Gobbins breeding seabird colony will also be adversely affected, this is the only land based puffin colony in NI.


Tourism is a growing economic benefit to the local economy and this gas storage facility and the potential damaging impact on the local wildlife will have a negative impact. The Local Council has spent millions of the local peoples rates on the Gobbins Coastal path, the main attraction being the seabird, this will be affected by the dead zone created.

The benefit of the storage to the local economy is very limited as the labour for the creation of the caverns will be done by outside contractors and the facility will be run by a skeleton staff.

I also have health and safety concerns of gas storage due to the local fault and recent tremors, also the Northern Ireland Health and Safety Executive deem the project a high risk. The project has limited resources and relies totally on grants and shareholders and should something go wrong will not be able to recompense or but right any damage.

I also would like to request that a public enquiry be held

Regards





DAERA MARINE & FISHERIES DIVISION  
04 FEB 2020  
RECEIVED

Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Email: [Marinelicensingteam@daera-ni.gov.uk](mailto:Marinelicensingteam@daera-ni.gov.uk)

January 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

Personal objection here

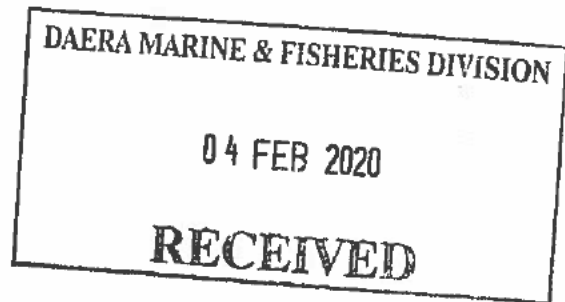
Please sign when complete

My major objection is that these gas caverns are not needed and weighing that against the environmental damage that they will produce, I can see no reason whatsoever for issuing a licence.

Yours faithfully,

A large black rectangular redaction box covering the signature area.





[REDACTED]

Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Email: [Marinelicensingteam@daera-ni.gov.uk](mailto:Marinelicensingteam@daera-ni.gov.uk)

January 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

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Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

Personal objection here

Please sign when complete

I feel that the lack of need for these gas caverns weighed against the general dangers & environment dangers would obviously mean a licence would not be granted.

Yours faithfully



DAERA MARINE & FISHERIES DIVISION

04 FEB 2020

RECEIVED

Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Email: [Marinelicensingteam@daera-ni.gov.uk](mailto:Marinelicensingteam@daera-ni.gov.uk)

28 January 2020

Dear Sir / Madam,

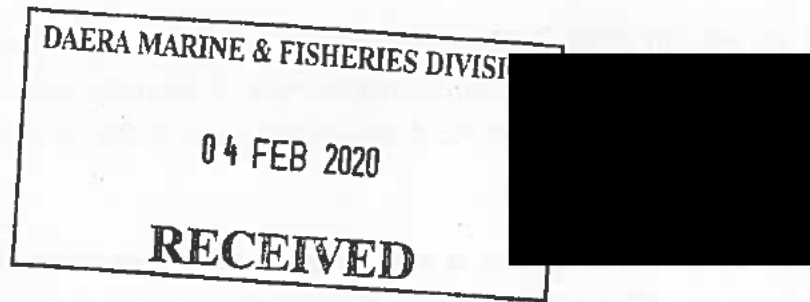
**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

I want the wildlife here to be protected not put at risk by companies looking to make money. I thought that all the protections already in place were reliable and can't see how this project is being considered between protected areas and sanctuaries. These protected zones are there for the reason that the ecology of the area is important. Do not risk the balance of nature for a gas project that we do not want + do not need.

**Objection to Islandmagee Energy / Infrastrata Marine Licence Application**



29th January 2020

Dear Sir / Madam,

With reference to the Marine Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining.

I found the public consultation documents exceptionally difficult to follow, nevertheless I have examined the information provided and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation. I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Licence as per the Public Consultation for the following reasons:

Why have out of date documents been presented for public consultation?

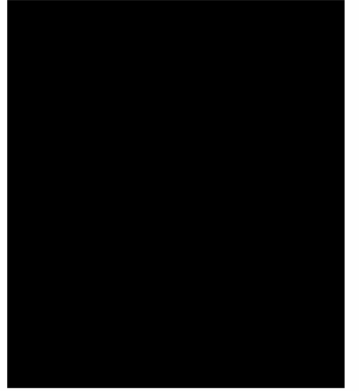
The Environmental Statement Non-Technical Summary states the project is "driven by the need to achieve security and maintain flexibility in the UK and Ireland's energy supply" The document states Northern Ireland, at the time of writing, was producing and consuming 7%

of its electricity from renewable sources with a target to achieve 12% of renewable electricity by 2012.

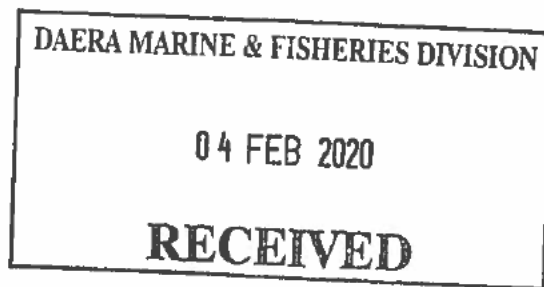
We are now in 2020 and Northern Ireland is already capable of achieving and consuming 70% of its electricity from renewable sources. If we have had an adequate supply of gas in previous years, why do we need gas storage now when so much of our electricity comes from renewable sources?

In my opinion this project is not sensible and poses a totally unnecessary risk to the environment. Why is the dumping of brine sludge of up to 1000m<sup>3</sup> per hour for four years even being considered in the proximity of so many protected areas? The Roseate Tern in the Larne Lough SPA is a red flagged endangered species. The North Channel dSAC, directly into which the hypersaline brine will be discharged, is a designated area of conservation for the very popular harbour porpoise.

I believe the risks of this project heavily outweigh the benefits and I see no logical reason why the Marine Licence should be granted.



**Objection to Islandmagee Energy / Infrastrata Marine Licence Application**



2<sup>nd</sup> February 2020

Dear Sir / Madam,

With reference to the Marine Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining.

It's worth noting I found the public consultation documents exceptionally difficult to follow, nevertheless I have examined the information provided and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation. I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Licence as per the Public Consultation for the following reasons:

This project is deemed a high risk project by Northern Ireland Health and Safety Executive. I am astounded that the Department is considering the construction of enormous caverns capable of storing huge amounts of gas in an area dangerously close to human habitation, a designated Special Area of Conservation for Harbour Porpoise and Larne Lough SPA home to the endangered Roseate Tern. Yet there is no up to date evidence of need for this project. It would appear to me that the

benefits of this project do not outweigh the risks and it is neither sensible nor necessary.

On examining the updated planning application I was surprised to see the following statement in Section 3.4.2

“[Note: the cavern locations shown are estimates only and will only be confirmed at detailed design stage, some may even be located under the land rather than under the Lough]”

At what point will the exact position of the caverns be made available for public consultation?

Also worryingly in Section 3.4.3

“After the base of the Permian salt is reached (at a depth of about 1,750m), a bridge plug will probably be set to ensure the successful installation and cementation of the last cemented casing with diameters of 13 3/8” down to the casing shoe of the anchor casing and 14” from the shoe of the anchor casing down to 40 m below the top of the Permian salt (roof pillar). This casing will have to be gas tight and is expected to be installed with welded connections.”

The vague language continues throughout the entire chapter referring to caverns and also as we move to decommissioning of the caverns and I note only a basic CSA concept has been prepared as “worldwide, there are only a handful of gas storage caverns that have been abandoned”

I also note in Section 4.11.2.3 Cavern Sealing in reference to the abandonment of the caverns “Theoretically, the pressure increase will stop as soon as the internal cavern pressure is equal to the formation pressure of the surrounding rock salt.”

Why, if such caverns have been in use all over the world for the number of years the applicant suggests in the project literature, are we still working in theory and not fact? This is a worry concerning the high risk nature of the proposal.

Where is the evidence of approval by the Northern Ireland Health and Safety Executive and the Crown Estate?

I am also concerned to note you have omitted from your cumulative assessment the potential environmental impact of the proposed redevelopment of the terminal at Cloghan Point. (Planning Reference LA02/2018/1145/F)

The dumping of up to 1000m<sup>3</sup> of saturated brine per hour for 4 years directly into the North Channel dSAC designated for harbour porpoise in combination with the effect of the noise disturbance from the construction and running of the

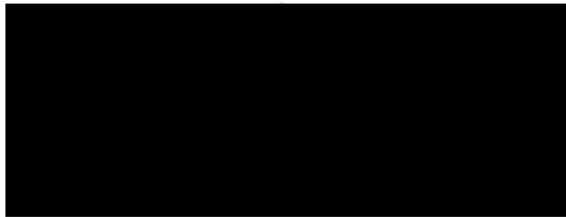
Cloghan Point proposal and the Gas Cavern proposal has not been adequately addressed. I have not seen sufficient evidence in the documents provided to reassure me that these beautiful creatures will not be harmed or displaced. I would certainly hope for the adoption of the precautionary principle in this regard.

In conclusion I believe the proposed project does not meet your criteria of sensible or necessary and I see no logical reason why the Marine Licence should be granted.

It causes me great stress to see Islandmagee, my home, the place where I have lived all my life in peace, become the centre of attraction for a company whose only objective is to make money with no regard for human life, animal life, marine life, land nor property. Need for this project must be revisited.

I would be grateful if you would acknowledge receipt of my objection letter.

Yours faithfully

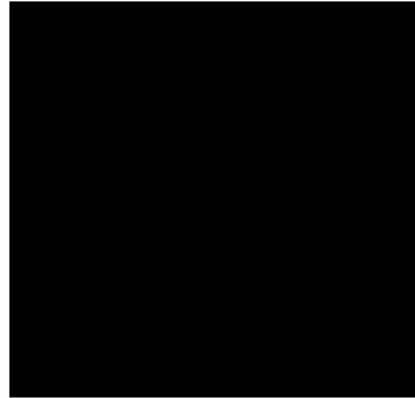




DAERA MARINE & FISHERIES DIVISION

04 FEB 2020

RECEIVED



23 January 2020

Marine Licensing Team  
Marine and Fisheries Division  
Dept of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Ave  
Belfast  
BT7 2JA

Dear Sir/Madam

We write with reference to the Marine Construction Licence Application 2019 ML 28\_12 by Islandmagee Energy/Infrastrata, for a proposal to create 7 (or more) huge caverns underneath Larne Lough for the storage of flammable gas. We wish to strongly object to the granting of this licence due to the following major concerns.

There is simply no need for this project, which would involve the possibility of very serious danger to the people of East Antrim, huge environmental impact from the sheer size of the proposed caverns, the land affected, the road infrastructure, and the delicate marine environment. The area of sea to be impacted and turned into a dead zone is home and feeding area for marine animals such as harbour porpoises, dolphins, grey and common seals, otters, birds such as puffins, gannets, fulmars, kittiwakes, manx shearwaters, black guillemots and guillemots, razorbills, petrels and many more, not to mention those fish and crustaceans which live in the water. The discharge of up to 1000m<sup>3</sup> of hypersaline brine per hour (24000m<sup>3</sup> per day) for at least 4 years, 450 m from the shoreline at Castle Robin of Islandmagee will create a completely dead zone for any creature.

The roseate terns and other terns which nest on Larne Lough fly to this area for sand eels almost non-stop when raising their young. If there is no food for puffins, they will move away from this coast, and no longer be the poster icon for the recently re-established Gobbins.

The North Channel area to be impacted is a Designated Area of Conservation for Harbour Porpoise.

The public consultation documents do not provide any evidence of the necessity for this facility for Northern Ireland, Ireland or mainland Britain. The reverse SNIP required for provision of gas to mainland Britain has not been costed or planned for, nor has the environmental damage of that possibility been considered.

The fact that it will only require a skeleton staff to man the post-construction facility does not provide sustained job opportunities for local or other people.

There are very serious concerns over cavern safety, during construction and longer term, and the proposed site is relatively close to the underground salt mines which extend from Kilroot to Ballycarry. The Irish Salt Mining Company have had to re-route their mining recently, due to encountering basalt which does not support open caverns. They have been mining salt for decades and are very experienced. What experience does Infrastrata actually have, regarding creating huge underground caverns? None.

Ballylumford harbour is used by many people during the summer months and throughout the winter for leisure pursuits, there are sailors, kayakers, swimmers, leisure boaters and fishermen and women using Larne Lough and enjoying its beauty and tranquility on a regular basis, the introduction of large drilling platforms will destroy this area, visually, and will create sound which will be off-putting to potential tourists. Larne Lough is an SPA with the red flagged endangered Roseate Tern a priority species.

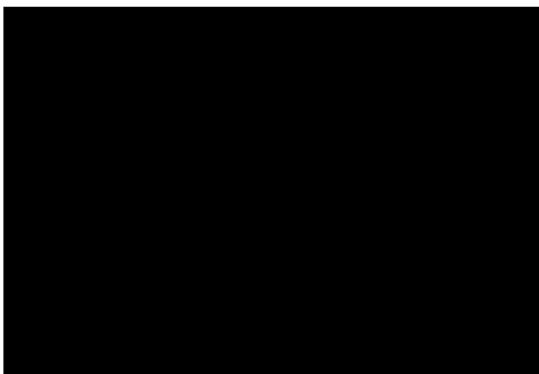
The Gobbins, Muck Isle and The Maidens are Areas of Specific Scientific Interest.

How can the granting of a marine licence sit with these policies?

The local fishing industry, in the form of fishing and crab and lobster fishing will be decimated by the noisy machinery and by the brine outfall area, an area where we personally have seen minke whales, dolphins, harbour porpoise, seals, sun fish, and many different species of birds. This is such an important area for feeding and for birds flying through on the migratory routes, we cannot allow the ecosystem to be destroyed for the benefit of a few individuals to make a profit from a resource, which use is to be scaled down to zero in the very near future.

As members of the public with very serious concerns, we are of the opinion that there should be a public enquiry, under Regulation 17 of the "Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006, the Department has the power to order a public enquiry for the purpose of evaluating representations made during a public consultation exercise.

Yours sincerely



DAERA MARINE & FISHERIES DIVISION

04 FEB 2020

RECEIVED

Marine Licensing Team

Marine and Fisheries Division

1<sup>st</sup> floor Klondyke Building

BT7 2JA

2.2.20

Dear Sir/Madam

REF:- Islandmagee Energy Mare Licence Consultation ML 28\_12

I wish to object to the issuing of a Construction Licence as per the Public Consultation for the following reasons:

The effect the discharge of hypersaline brine for 4 years into the sea may have on marine life and sea birds and their feeding grounds.

The impact on leisure pursuits, tourism and local fishing industry.

The risk to health and safety should anything go wrong

I feel there should be some sort of public inquiry to evaluate and reassure public concerns.

[REDACTED]

DAERA MARINE & FISHERIES DIVISION

04 FEB 2020

RECEIVED

Marine Licensing Team  
Marine and Fisheries Division  
Department of Agriculture  
Environment and Rural Affairs  
1<sup>st</sup> Floor Klondyke Building  
Cromac Avenue  
Belfast  
BT7 2JA

3 February 2020

Dear Sir / Madam

With reference to the Marine Construction Licence application 2019 Consultation ML28\_12 by Islandmagee Energy/Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission of the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public enquiry, as under Regulation 17 of the Water Abstraction and Impoundment (Licencing) Regulations (Northern Ireland) 2006, the Department has the power to order a public enquiry for the purpose of evaluation representations made as a result of a public consultation exercise.

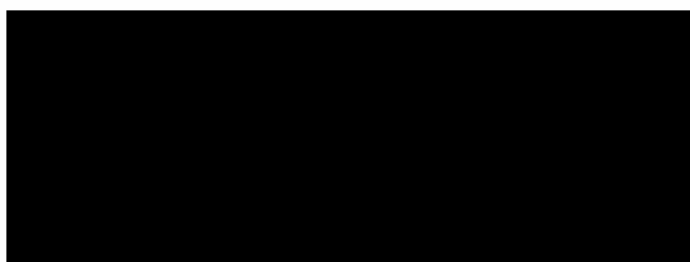
In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

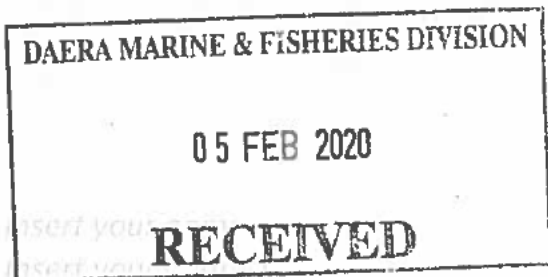
- Discharge of up to 1000m<sup>3</sup> of hypersaline brine per hour per day (24,000m<sup>3</sup> of toxic brine per day) for 4 years into the sea, just 450m from the shore near Castle Robin at Islandmagee, creating a benthic dead zone
- Designated Special Area of Conservation (North Channel dSAC, directly into which the hypersaline brine will be discharged, recently designated for Harbour Porpoise)
- Special Protected Areas: Proposed East Coast (NI) Marine SPA (abstract/discharge area is within the pSAP boundary)
- Larne Lough SPA (with red flagged endangered Roseate Tern a priority species)

- Areas of specific scientific interest (ASSIs: The Gobbins, Muck Isle, The Maidens)
- Only Northern Ireland land based breeding Puffin colony located near to discharge area
- Death of sea-life and prey species (potential impact on the food chain)
- Threat to sea birds and feeding grounds
- Concerns that protected species Porpoise/Otter/Dolphin could be displaced
- Potential impact on leisure pursuits fishing/diving/swimming/boating etc.
- Potential negative impact on tourism/Gobbins project
- Potential impact on local industry fishing/diving
- Construction phase timescale and additional traffic impact/dangers on roads that are neither suited to heavy vehicles or increased volume
- Only a 'skeleton staff' required to operate facilities after construction according to public consultation documents
- No evidence of need for gas storage provided in the public consultation documents
- Serious concerns over safety, now and in the long term (gas leakage, pollution)
- Deemed a high risk project by Northern Ireland Health and Safety Executive.

The north of Islandmagee already houses NI's largest power station and the Moyle Interconnector with pylons and overhead power lines a prominent feature around the area. I have genuine concerns about how this project is going to impact the environment and the natural beauty of the coastline, residents safety, health and wellbeing and growing tourism within the area.

Yours faithfully





4<sup>th</sup> FEBRUARY 2020

Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Email: [Marinelicensingteam@daera-ni.gov.uk](mailto:Marinelicensingteam@daera-ni.gov.uk)

January 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

I returned to Islandmagee in late 1998 to be near my elderly parent and family. Unfortunately in the past 21 years there has been recurring upheaval with the building of:

- A The interconnector for the gas pipeline from Scotland.
- B The build of Ballylumford Gas power station.
- C A sewage pipeline from Mill Bay across the end of the island to discharge out in the North channel near Port Muck.

1. As a keen equestrian these have all combined to make leisure riding dangerous on these once peaceful, quiet lanes and roads. Construction of ever more housing has compounded this situation and added ever more traffic.
2. The road infrastructure has undergone a lot of degradation and destruction causing frequent patching of pot holes and road patching which has meant a lot of tyre and suspension damage. The most recent resurfacing of the low road at a cost of 1/2 million pounds created havoc during the height of the tourist season in which one elderly resident died by a tourist driving on the wrong side of the road on a blind bend.

Now it is planned to foist a further road upheaval for the next 7 plus years - for what good reason?

3. There was no proof of requirement for these gas caverns in the original public consultation document. Neither were the local job prospects fully justified either in the short or long term. So why are these caverns required?

4. The most recent government policy is increased renewable energy and removing all domestic gas boilers in the next ten years; also how would this project fit in with the new environmental policies outlined recently by Theresa Villiers MP?
5. Following the recent seismic activity on the north coast and in Belfast Lough, has there been a new G.S.N.I. survey done to look at the impact on the land surrounding Larne Lough?
6. Why is gas storage required at all, when we have a neighbour to our south who would be able to sell us gas? After all the per head of population in N.I. using piped gas is mainly in urban areas. There is no access to mains gas on Islandmagee, we all use bottled gas, oil and electricity and many farms have wind generators, also quite a lot of people have installed solar panels too.
7. To construct these caverns the amount of sea extracted will deplete the amount of plankton and beneficial microbes for the species resident and visiting Larne Lough. The resulting brine discharged out at Castle Robin having a massive impact on the bottom of the marine food chain, especially the slack water times as the outflow is too near the shore. Our sand eels, crustaceans, sea weeds and sea birds will be lost having a profound effect on fishing and tourism necessary for our community. Who will pay the compensation - the public purse again?



8. Should there be a burst in this brine pipeline across fertile farmland, what will be the effect on this land and who would be liable for the monies needed to repair - compensate the farmers affected?
9. Should this project proceed, where are the building funds coming from, when this company has not recorded any profits for the past 10 years?
10. This is the same firm that has bought Harland and Wolff shipyard without an appropriate marine licence and was late with their first payment for such. Who would be liable to complete the project or have to restore our road infrastructure and lands? Would it be like the abandoned drill site in Woodburn Forest, Carrickfergus left un-restored, and incidentally causing the police to expend a lot of money in protection and diverting those funds away from more urgent needs?
11. How can we be assured and confident that this project has not been, nor will be influenced by any political party, as the last-thing the newly restored Assembly needs is another R.H.I. type scandal with the ensuing public enquiry and drain of money from the public funds to pay for such?
12. Just who is making the final decision on this project and what is the signing off date? They will be ruining designated areas of Special Conservation in the North Channel and the proposed East Coast (NI) Marine SPA (abstract - discharge area in Larne lough).

The areas of special scientific interest, the Gobbins, Muck Ishe and The Maidens will be put at risk, and the red legged Roseate Tern, the protected porpoises, dolphins and otters plus puffins and other sea birds around our shores.

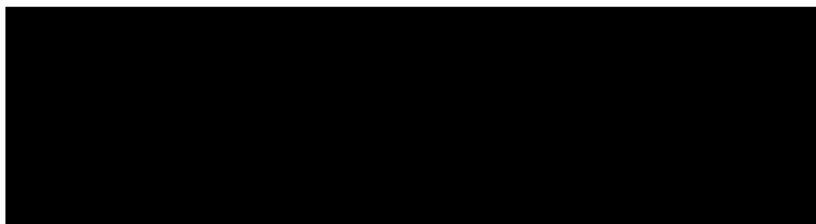
13. The N.I. Health and Safety executive have deemed this a high risk project now and in the long term. As they are unhappy why is this project being considered at all?

The worry of the safety of these caverns is already impacting on the mental health of residents.

14. As we see day and daily in the news, mankind is killing our planet, ruining our sea life, wild life and ecosystems at a growing rate; why must this firm be allowed to build this project at all?

15. This small patch of God's green earth has suffered enough deprivation, Surely it does not have to suffer another 7-9 years of more deprecation?  
Please stop this jolly.

Yours sincerely



DAERA MARINE & FISHERIES DIVISION

05 FEB 2020

RECEIVED

Marine Licensing Team,  
Marine & Fisheries Division,  
Dept. of Agriculture, Environment  
& Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
BELFAST  
BT7 2JA.

Ref: Proposed Gas Caverns at Islandmagee

Dear Sir/Madam,

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining. I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as under Regulation 17 of the WATER ABSTRACTION AND IMPOUNDMENT (LICENSING) REGULATIONS (NORTHERN IRELAND) 2006, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

1. With reference to the discharge of  $1000\text{ m}^3$  hypersaline brine per hour per day ( $24,000\text{ m}^3$  toxic brine per day) for 4 years into the sea just 450 m from the shore near Castle Robin at Islandmagee, creating a benthic dead zone. I come from an old Islandmagee family (from 1750 hundreds). My great grandfather and his before fished at the Maidens to see them fed for the winter. They would have rowed out and drifted back towards Brown's Bay. This can clearly be seen in a short film "Maidens in Distress" - IFLI Player where the ferry boat engine is stopped and boat is seen drifting back towards land. I am sure this would happen to the brine.
2. The damage it will cause to the bird population namely the breeding colony for puffins, the endangered Roseate Tern. It will greatly affect their feeding grounds.
3. I would also be concerned about other protected species namely, porpoises, otters and dolphins.
4. Are we not a specially protected area. Proposed East Coast (NI) Marine SPA (abstract/discharge area is within the pSPA boundary)

5. I feel this would have a detrimental effect on the tourism - Robbins Walk and how people (visitors from afar) would view our beautiful peninsula. I have spoken to people from all over the world at Brown's Bay - all thought it beautiful.

It will impact on the local fishermen & lobster fishermen - even ourselves who gather dulce and get crabs from the rocks.

How safe would it be for children going in the sea?

6. I do not believe the promise of lots of jobs for local people. Perhaps some labourers but any other work would be specialised.

As governments are phasing out gas - I do not see the need for this. Just yesterday on the news government are considering ripping out gas heating from homes.

7. This has been deemed a high risk project by N.I. Health and Safety Executive.

The fact that there is a fault out in the lough is a big concern. Do these people really know what they are doing or has money got them the answers they want to questions.

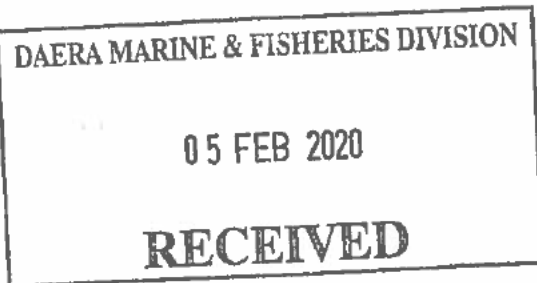
Will they really be able to fit 7 of these gigantic caverns in the lough or as I feel more likely they will go under the Island. How safe would that be? Why should people have to line in fear of possible explosions, sink holes for some peoples' greed. They will be far enough away from it.

8. As already mentioned in No.1 re tide flow. In bad weather the brine isn't going to be obedient and just go 450m out and stay there. The North Channel can be very rough. I feel the Salmon fisheries at Glenarm could be under threat and it may even reach the seagrass meadows at Waterfoot. Also the Ocean Quayhoys in Belfast Lough are protected. I fear the potential damage could be more far reaching than Infrastrata and Islandmagee Energy would want us to believe.
9. I would also be concerned about the amount of vehicles on the road and the speed. The roads in Islandmagee are not adequate for the traffic now let alone a vast number of lorries. When the interconnector was being built a lady almost lost her life in a bad accident.
10. I am greatly concerned about the legacy this will leave for my grandchildren and future families as I think Islandmagee has suffered enough in terms of energy - Power Station, Interconnector.

I urge you to call a Public Inquiry.

Yours faithfully





To whom it may concern.

I would like to make known my objections to the Islandmagee energy/Infrastrata marine construction application ML 28\_12

I have numerous reservations and serious concerns about this. Firstly, I feel there is no need for a facility of this nature at all. From the latest information I was able to find from this company the construction period could be up to nine years. That is an unreasonable amount of time to cause disruption to any community as in theory a child starting the local primary school could have their journey to and from school disrupted every single day they attend that school and then for another couple of years in secondary level education. Nowhere in the company statements can I see how exactly local disruption is proposed to be addressed. The company in environmental impact statements have in no way made it precisely clear just how much disruption they would cause to facilitate their plans. So much has changed in this area since they first looked at this. Another point I would like addressed is the huge amount of energy required to run the plant needed to pump water and solution mine. I recall on one of their releases it stated a draw of 30 to 40 megawatts of electricity. That then could have potential to consume that amount of power 24 hours a day 7 days a week for up to nine years. Have the company at any point stated how they plan to offset the carbon produced? The power takes me to another concern, Ballylumford power station has a new owner since EIA was first conducted. Has the new owner been consulted?

More serious concerns to me surround the company behind this. From any research I have done about it they claim to be "Leaders in gas storage" I stand to be corrected but this company have yet not stored gas whatsoever. The company seem to be financially unsound and therefore I have fears that they start a massive disruptive construction project then run out of money and leave no one accountable to attempt to put any damage done to right. A very serious question and one I feel needs a clear and unambiguous answer is responsibility. Right from this public consultation I as a member of the public rightfully demand that a named person take responsibility for any decision they make, this includes yourselves and any government minister as well as the company. Infrastrata do not have a very good history regarding walking away from environmental damage they have caused when in the past no one was made responsible. Accountability must be clearly shown as I will be keeping this letter for future reference should anything untoward cause damage to persons or property or the environment due to this project being allowed to proceed. The question has been clearly asked and will be recorded if needed to be referred to in the future regarding liability.

Next, I would like to highlight my fears around the geology under Islandmagee and Larne lough. Its no secret that there have been albeit quite small but none the less concerning earthquakes and tremors which I feel is much too risky to destabilise further by solution mining. The consequences of a gas leak could be catastrophic, and the proximity of Larne town and harbour concern me. Also has anyone considered the likelihood of a gas escape to the existing salt mines which are not that far away. I've also heard that some shareholders of this company are quite keen on using caverns to store hydrogen which is a terrifying prospect.

Infrastrata have made great claims about putting money into the area with grants and sponsorship, have they been asked how they will mitigate any increase in homeowner's property insurance? This project has been identified as high risk by HSE so insurance premiums in the locality are bound to be inflated so not only will we be asked to put up with disruption, but we will also have to pay for the privilege through higher insurance. I will also highlight that property prices are bound to be severely impacted therefore removing the ability of anyone fearful of living on the periphery of a huge gas store the chance to leave possibly the place they have spent their entire life happily.

My thoughts now turn to the environment and damage caused. Again I will remind you of Infrastratas attitude to the Woodburn forest I suggest they be told to put all damage done there to right before this next potential licence is even considered as a gesture of their sincerity and commitment to safeguarding the area I live in. In their publicity which I may add only appeared on the Islandmagee energy website well after this consultation period had started and public meetings inadequately notified and held at ridiculous times eg 6 to 10 am on a Saturday morning. The companies behaviour through all this gives me absolutely no confidence in them If they cant even openly and honestly hold public consultation (on one occasion the meeting was advertised in the local press the day after the meeting had taken place) then how can we have any faith in them undertaking such a huge and potentially dangerous project on our doorstep ?

I digressed slightly as I'm no expert letter writing and wandered off my environmental concerns. To the best of my knowledge the areas from which sea water will be drawn and heavily concentrated before discharge are areas of protection designated by government. Can you please tell me then what is a permitted level of pollution allowable in these areas? all the infrastrata publicity states their discharge will be within permissible levels so I am left wondering exactly what the figures is allowable. They give the impression they know so therefore I ask as at a consultation event no one could tell me exactly.

I have plenty more reservations about this including promised jobs and the company becoming involved in the Belfast shipyard Myself and many others feel this was a political move to ingratiate themselves to government and to put pressure on to grant licences. I sincerely hope this is not true as I remind you again my remarks on accountability My opposition to this will not be diminished regardless of any decision your department may make

Yours in concern.

A solid black rectangular redaction box covering the signature area.



DAERA MARINE & FISHERIES DIVISION

05 FEB 2020

RECEIVED

*Insert your name*  
*Insert your address*

Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Email: [Marinelicensingteam@daera-ni.gov.uk](mailto:Marinelicensingteam@daera-ni.gov.uk)

January 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

In a time when saving our environment is of such importance, I believe this proposed licence for such a detrimental project cannot be allowed.

*Please sign when complete*

I live in Islandmagee and understand the importance of the natural environment here. This is highlighted by existing environmental zones including; Designated Special Area of Conservation, Special Protected Areas, and Areas of Specific Scientific Interest. The gas cavern project would ruin these areas and all the wildlife here. A dead sea would be produced and fish, birds and mammals would all be negatively affected. Islandmagee is particularly important as it is the only land based puffin breeding colony in N. Ireland. We also have a rich bird life especially at Portmuck, which includes an endangered species. It would be madness to allow a licence to a project that would do so much harmful damage to an important environmental area.

I also have major concerns over the safety of the gas caverns. This has been deemed high risk by N. Ireland Health and Safety Executive, which adds to my concerns. Having gas stored in this way, close to so many people, makes me uneasy in case of any leaks or explosions. My daughter and I moved to Islandmagee for health reasons due to the clean air and environment, but this project would undoubtedly erase this and make us unwell. We use the sea at Brown's Bay and Portmuck harbour for cold water therapy and swimming, again for health reasons, however, the brine water produced by this project would make swimming difficult and the danger posed by gas storage below the seabed would deter us from entering the water.

The marine areas of Islandmagee are a very important part of our community, for both residents and tourists. All the concerns I have included combine to cause me extreme worry and fear of what this project could do if granted

[REDACTED]

27 January 2020

Marine Licensing Team, Marine & Fisheries Division,

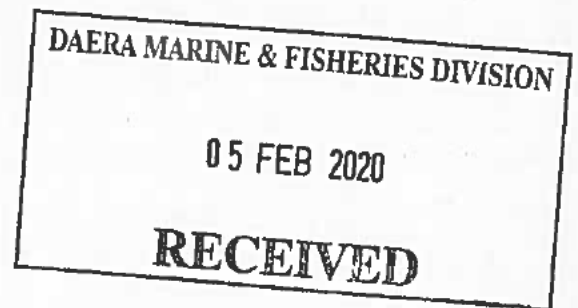
DAERA

1<sup>st</sup> Floor, Klondyke Building,

Cromac Ave,

Belfast, BT7 2JA.

27 January 2020



Dear Sir/Madam,

Re: Islandmagee Energy Marine Licence Consultation ML 28\_12

With reference to the above license application for the proposal to create seven underground storage caverns below Larne Lough for the storage of natural gas and which includes the infrastructure to enable seawater abstraction and the discharge of brine from the caverns by solution mining. I wish to object most strongly to the project and the granting of a Marine Construction License.

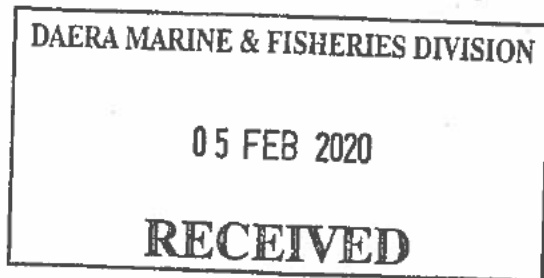
It is my belief that discharging large quantities of brine for a prolonged period into the sea just 450 metres off the coast will poison the Special Protected Area and create an area of dead sea, thus killing the food source for many species of aquatic life and birds. There will also be an impact on all types of fishing. While this area may recover with time the damage will have been done and many species will have gone forever.

No evidence has been produced for the need to store gas or to provide employment for the local population.

This project has been deemed to be high risk by the Northern Ireland Health & Safety Executive and I have serious concerns about the safety and environmental impact of this on the Larne Lough and coastal area and therefore I believe the Department should order a public enquiry under Regulation 17 of the Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006.

Yours faithfully

[REDACTED]



Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Email: [Marinelicensingteam@daera-ni.gov.uk](mailto:Marinelicensingteam@daera-ni.gov.uk)

31<sup>st</sup> January 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

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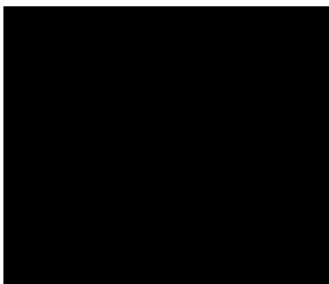
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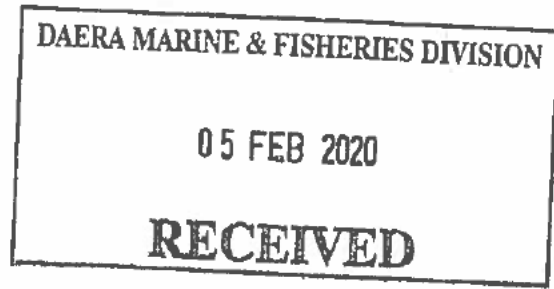
In the meantime, I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

- The vast amount of brine which will be discharged into the sea creating a benthic dead zone

- The harmful discharge of brine in the special area of conservation designated for Harbour Porpoise.
- The potential impact to sea life due to harmful brine impacting the food chain, threat to sea birds and their feeding grounds.
- As a member of Whitehead Coastal Rowing Club, the attraction to rowers is the sightings of sea birds and mammals. Coastal rowing in Whitehead is in its infant stages and is appealing to more and more people within the local community. It is a hobby which has great health and well being benefits for everyone involved. The potential of negative impact on leisure pursuits such as rowing, swimming, fishing, etc, would be absolutely devastating.
- I have serious concerns over cavern safety now and in the long term.

Yours faithfully





Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Email: [Marinelicensingteam@daera-ni.gov.uk](mailto:Marinelicensingteam@daera-ni.gov.uk)

January 2020

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In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

## MARINE/NATURAL WORLD

- Discharge of up to 1000m<sup>3</sup> of hypersaline brine per hour per day (24,000m<sup>3</sup> of toxic brine per day) for 4 years into the sea, just 450m from the shore near Castle Robin at Islandmagee, creating a benthic dead zone.
- Designated Special Area of Conservation (North Channel dSAC, directly into which the hypersaline brine will be discharged, recently designated for Harbour Porpoise)
- Special Protected Areas: Proposed East Coast (NI) Marine SPA (abstract/discharge area is within the pSPA boundary)
- Larne Lough SPA (with red flagged endangered Roseate Tern a priority species)
- Areas of Specific Scientific Interest (ASSIs: The Gobbins, Muck Isle, The Maidens)
- Only Northern Ireland land based breeding puffin colony near to discharge area
- Death of sea-life and prey species (potential impact on the food chain)
- Threat to sea birds and feeding grounds
- Concerns that protected species porpoises/otters/dolphins could be displaced

## AFFECT ON PEOPLE

- Potential impact on leisure pursuits fishing/diving/swimming/boating
- Potential negative impact on tourism / Gobbins Project
- Potential impact on local industry, fishermen, lobster fishermen

## LACK OF NEED

- Only a "skeleton staff" required to operate facilities after construction according to the public consultation documents.
- No evidence of need for the gas storage provided in the public consultation documents

## CAVERN CONCERNS



- Serious concerns over cavern safety, now and the long term.
- Deemed a high risk project by Northern Ireland Health and Safety Executive.

Yours faithfully



DAERA MARINE & FISHERIES DIVISION

05 FEB 2020

RECEIVED

Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Email: [Marinelicensingteam@daera-ni.gov.uk](mailto:Marinelicensingteam@daera-ni.gov.uk)

January 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

As is commonly known, fossil fuels are an extremely finite source with many negative environmental factors. As an environmentally conscious nation we are finding responsible alternatives to fossil fuels. Therefore, on the whole, these Gas caverns would be a waste of time and resources and frankly, quite pointless.

If the construction of these Gas caverns were to go ahead it would have a devastating impact on local areas of conservation such as the North Channel dSAC which we have

presence over time. These creatures form part of the food chain of many coastal inhabitants and even local economy. I am also concerned that many protected species such as dolphins may be displaced.

Aside from the impact on mammals and other sea life, their growth effect on the people. Many leisure activities, which provide a healthy outlet for hard working and individuals who are fishing/diving/swimming etc as an escape. The loss of these activities may result in a deterioration of mental health. The conservation of these towers will also have a significant impact on tourism in Island, and in turn, that many of us rely on to make a living.

As we know, Gas is a potentially extremely dangerous fuel. What plans are in place for the safety of those involved in the construction or those who use in the area in the event of a gas leak? What request maintenance will need to be conducted and how will be appointed to such a high level position.

In conclusion, the thought process behind the construction of these towers is extremely questionable. Absolutely no consideration or regard or the sustainability of this idea. It would be thoughtless and ridiculous to continue with this project. It is not for the good of the people.

I hope you will consider this letter and rethink your position. Yours faithfully,

Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Email: [Marinelicensingteam@daera-ni.gov.uk](mailto:Marinelicensingteam@daera-ni.gov.uk)

3<sup>rd</sup> February 2020

Dear Sir / Madam,

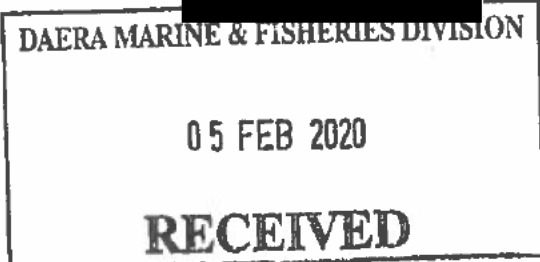
**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

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Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

Regarding need: initially proposed pre 2010, the company speaks in its documentation about a need for a storage facility for natural gas. Since then, the demand for and use of renewable and sustainable forms of electricity generation has increased and the need for a gas storage facility has reduced. In fact in the 12 months from October 2018 to September 2019; 44.9% of Northern Ireland's electricity supply was generated from renewable energy, with a record high of 58.6% produced in February 2019 (*Statistics and Economic Research DfE NI.gov.uk 5/12/19*). This represents an increase of 6.7% from 38.2 % in the 12 months up to March 2019, and up from 25.4% in 2015. Renewable energy only accounted for 3% of our electricity supply in 2005 when this project was first explored. I have also taken the time to speak personally to Phoenix Gas employees, who themselves have confirmed that there is no risk to natural gas supply in Northern Ireland; thus making this development a superfluous and unnecessary project.

In fact the House of Commons NI Affairs Committee: Electricity Sector in NI Report (2016/17) stated the following; *"Electricity Storage presents a particular opportunity for NI where these*



*(emerging electricity storage) technologies could allow the market to take full advantage of the significant investment that has been made in renewable generation in recent years. The ability to store renewable energy has the potential to dramatically increase the contribution of renewables on the system, reduce the cost to consumers and allow for more efficient management.*” Surely then we should be looking to develop these storage facilities for renewable production. I have also read that the site at Kilroot Power Station has been identified as a possible location for this, negating further the need to store gas.

The Company has tried to convince readers that the caverns will protect supply and consumers, however a report by Saeid Mokhatab ( a world class expert in the natural gas processing industry) and John Y Mak (Senior fellow and Technical Director Fluor chemical and energy), state in their Handbook of Natural Gas Transmission and Processing (4<sup>th</sup> Edition) 2019 1.13.3. Salt Caverns that, *“They (Salt Caverns) are at best for peak loads and short term trading rather than long term seasonal storage..... Where the deliverability is higher, turnover will be higher.”* This shows us that this company is only interested in generation of money for its shareholders and has no regard for the environment, consumers and indeed tries to mislead planners that this will protect the UK’s supply of natural gas.

Regarding the Environmental Impact: this area of East Antrim has had the following important environmental areas already identified and under national and international protection:

Larne Lough; a Ramsar site and Special Protection Area (SPA) with red flagged endangered Roseate Tern a priority species.

The Special Area of Conservation (SAC) at the Maidens (also an ASSI), past which any brine discharge will have to pass to get through the North Channel.

Areas of Special Scientific Interest (ASSIs) at Portmuck, Muck Island, The Gobbins (where Northern Ireland’s only mainland breeding and resident colony of Puffins exist.

Nature Reserves at Muck and Swan Islands.

Designated Special Area of Conservation (North Channel dSAC), directly into which the hypersaline, heated sludgy brine will be discharged. This area has been recently designated for harbour porpoise. These mammals with seals and dolphins are regularly to be seen from Larne to Whitehead, through the proposed East Coast (NI) Marine Special Protection Area. Both the abstract and discharge are within this pSPA boundary.

The following policies have all been created to protect our environment. The details of these must be taken into consideration when thinking about the potential damage which could be caused by this project.

The Regional Development Strategy 2035 aims to protect and enhance the environment for current and future generations. It recognises that Northern Ireland's environment is one of its greatest assets. Regional Guidance seeks to conserve, protect and where possible enhance our natural environment. Other relevant strategies and policies which this project contravenes on many levels are:

The Strategic Planning Policy Statement, the Northern Ireland Biodiversity Statement and the Marine Policy Statement.

Article 6(2) of the Habitats Directive 92/43/EC places a duty on all European Member States to avoid the deterioration of habitats and species within areas designated as SACs and SPA's.

The company admits that the discharge of up to 1000m<sup>3</sup> of hypersaline brine per hour per day for 4 years will be pumped into the sea 450m from shore creating a benthic dead zone in addition to a 'mixing zone' of radius 100m. A mixing zone of 100m equates to a volume of over 848,230m<sup>3</sup> in 27m depth continuous for 4 years, with the surrounding area increasingly being supersaturated with salt brine.

The company states that this will rapidly disperse, however this has been estimated using modelling techniques that may not take into consideration the complex nature of tides, currents and eddies which flow around Islandmagee and Larne Lough. In addition, the wind factor along the West coast of the Irish Sea and North Channel has been proven to change the normal flow of water. This research: Hydrography of the Irish Sea SEA6 Technical Report POL Internal Document 174 M J Howarth, produced as part of the UK Department of Trade and Industry's Offshore Energy Strategic Environmental Assessment Programme, regarding the circulation of water states, *"The mean flow is generally weak, by and large less than 0.1m/s and about 0.01m/s in many places, resulting from the sum of events (storms, peak river discharges) plus density gradients. Transit times from Sellafield to the North Channel have been estimated in the range of 6 to 12 months and a mean residence time for the Irish Sea of 1-2 years, although uncertainties associated with these estimates are large. Even though the average flow is northward, it should be remembered that water movement is strongly influenced by the wind, so that this flow can be reversed for months at a time."*

The vast majority of salt caverns in Europe are inland and the discharge is not put into an ecologically sensitive and important sea area. In addition, in these areas, often the salt extracted is processed and reused in food and other industries. This has not been suggested here. The company does not want to spend the money on the collection and production of salt, they are avoiding the cost of properly dealing with the waste matter they will create.

In addition to the issue of the hypersaline brine is the temperature that this will be extracted from the caverns. Very little detail is demonstrated in the documentation for scrutiny about what the final temperature of the discharge will be. Pierre Berest et al, states in the document Thermomechanical Aspects of Salt Storage Caverns (2011), that *"Rock mass temperature increases with depth. A typical value of the geothermal gradient in a salt formation is  $G=1.6 \times 10^{-2} \text{ C/m}$ : In a 400m cavern, the salt temperature is warmer at the bottom of the cavern than the top of the cavern by 6.4°C or so."*

Page 231 of Infrastrata Company's documentation confirms that the brine could be 10°C above the ambient water temperature. This will be significant. The aforementioned document, The Hydrography of the Irish Sea SEA6 Technical Report states that the mean average temperature in the North Channel is approximately 10°C so the brine discharge will have a significant impact on the water temperature, not just at the discharge site but along a vast tract of water.

Page 227 of Infrastrata Company's documentation Impact Assessment states *"Both very large potential adverse impacts are pollution induced. One is the potential for direct bird fatalities/injuries, and one is the potential for indirect disturbance via pollution induced food resource depletion during construction or decommissioning. The likelihood of a serious pollution incident is difficult to predict."*

In conclusion, Infrastrata do not know the full environmental extent of their project. They are trying to proceed with an activity that whilst not needed, will create a devastating effect on a highly important, ecologically sensitive and diverse area. The effect of the increased salinity and temperature of the water will not only effect the sea bed and the ecosystems that thrive there, but will affect the entire food chain. The consequence for the bird life and mammals that live, breed, winter and feed here will be catastrophic.

As a member of the public with serious concerns, I believe there should be a public inquiry, as under Regulation 17 of the Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

Islandmagee; with its blue flag beaches at Portmuck and Brown's Bay, the National Trust walks at Portmuck, Skernaghan Point and on the Gobbins Road, the re-development of the Gobbins Path and visitor centre, the golf course and riding centres, has the potential to draw many tourists and sustainable investment along with many job opportunities in these areas. This is what the majority of the local population are looking forward to, not the destruction of the beautiful environment in which it rests.

On the environmental grounds outlined above and the fact that this part of East Antrim has been acknowledged and given the protection from both National and International Conservation and Environmental bodies, I wish to strongly object to the issuing of a Marine Construction Licence as per the Public Consultation.

Yours faithfully

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

DAERA MARINE & FISHERIES DIVISION

05 FEB 2020

RECEIVED

February 4, 2020

Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs  
1<sup>st</sup> Floor Klondyke Building  
Cromac Avenue  
BELFAST  
BT7 2JA

Dear Sir or Madam,

I am writing to lodge an objection in respect of the application by Islandmagee Energy/Infrastrata to create seven underground caverns for the storage of natural gas, which includes associated marina infrastructure. This infrastructure would allow for seawater extraction and the subsequent discharge of brine from creation of the caverns by solution mining.

I wish to lodge objection to this proposal on the following grounds;

- 1) I would be extremely concerned at the impact on sea and marine life in the area if the brine discharge was allowed. The impact of this brine would, I believe, be detrimental to marine life and create a dead zone, thus impacting negatively on the marine ecosystem in the area. This discharge is intended to continue for four years, after which the entire ecology of the area would have been altered for ever.
- 2) This is an area with Special Area of Conservation, Areas of Special Scientific Interest and proposed Special Protected Areas, and the proposal would impact on these and could be seen as contrary to the spirit and intention of these measures.
- 3) The local area has become a major tourist attraction through the development of the Gobbins Cliff Path. Part of the attraction of the path (and why it is an ASSI) relates to the environment, ecology and natural sea life which exists there. However, if this proposal were to go ahead it would, to my mind, raise serious issues of the long-term viability of the marine life and ecosystem on the east coast of Islandmagee including the Gobbins. The prospect of loss of marine life and bird life on the cliffs would ultimately adversely impact on the tourism potential for the area. Given the importance of tourism to the Northern Ireland economy, this is a major issue.

Given the serious questions which are raised by the proposal, I believe that only a full public inquiry can tease out the various aspects of the application and the concerns surrounding it. As a member of the public with serious concerns, I believe that there must be a public inquiry. The Department, under Regulation 17 of the Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006 has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise, and I would ask that you now give this serious and favourable consideration.

Yours Faithfully

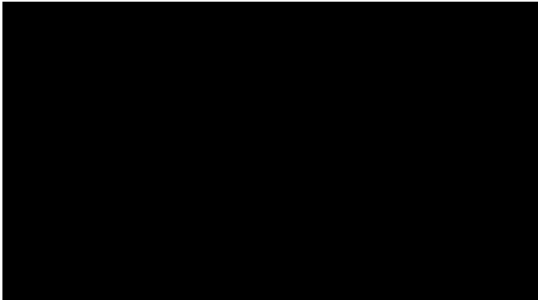




DAERA MARINE & FISHERIES DIVISION

05 FEB 2020

RECEIVED



Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Email: [Marinelicensingteam@daera-ni.gov.uk](mailto:Marinelicensingteam@daera-ni.gov.uk)

January 2020

Dear Sir / Madam,

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

As a 5th generation resident of Islandmagee,  
I am greatly opposed to this project of gas  
caverns going ahead around the area.

I would like to ensure that all wildlife, sealife  
and the seas be protected. Islandmagee has been  
a beautiful, natural area for tourism and I would  
like this to be continued for the future, along with  
the life that is found on it's shores.

- I have heard that it is illegal to drill within 5 miles  
of the salt mines that are based in Carrickfergus  
and the tunnels that come out of it. Can you  
please clarify this??
- I would also like to point out that we have never  
as yet been consulted on the actual caverns, can  
you please confirm when this will happen??
- I also would like to know how the tourism of  
Islandmagee will be protected if this project goes  
ahead??
- Also what about rogue munitions on the seabed  
from Beaufort's Dyke? Can you tell me how these  
will be managed around the proposed gas caverns, given  
that last year a controlled explosion have to be  
carried out within 50 miles of this project. (North  
coast).

I would like this stopped and my questions  
answered.



(1)  
DAERA MARINE & FISHERIES DIV

06 FEB 2020

RECEIVED

4-2-20.

Dear Sir or Madam,

Ref. Islandmagee Energy Marine Licence  
Consultation ML28-12.

With reference to Marine construction licence application 2019 Consultation ML 28-12 by Islandmagee Energy / Infra Strata for the proposal to create 7 underground caverns by solution mining below Lough Lough for the storage of natural gas which includes the associated marine infrastructure to enable sea water abstraction and the subsequent discharge of brine from the caverns by solution mining. I have examined the public consultation documents and I wish to object strongly to the project

and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation and I believe the project to be unnecessary with huge environmental impacts both in the scale and associated risks of the underground caverns.

I believe there should be a public inquiry as under Regulation 17 of the Water Abstraction and Impoundment (Licensing) Regulations (NI) 2006.

In the meantime I wish to strongly object to the issuing of a Marine Construction Licence as per the Public consultation for the following reasons;

- ① It would have a devastating affect on the environment of this whole Antrim coast, the high sodium levels in the

(3)

Sea would be totally detrimental to the already at risk wildlife and animals in the area.

(2) I have a property in Islandmagee where I swim all year round with my small children and this would ruin an area of outstanding beauty. The bird life would be effected with a lack of sea food. Seals would no longer live in the area. And would effect our health!

(3) we are living in a time of devastating environmental problems, we should be helping our planet not destroying it.

(4) I am so upset about these plans for my family and friends future enjoyment of the area. this will never bring the equilibrium of nature back to normal.

(5) We will not longer be able to fish and retrieve food from the sea to eat or share fish.

b) Millions of pounds have been spent on the Cobble paths to promote tourism in the area, but it will no longer support the bird + wildlife if these plans go ahead. A beautiful coast will then have no wildlife.

The crab and shellfish life has already been devastated from pollution in the last 30 years. I have watched this personally.

The Antrim coast provides huge income from tourism and golf etc, this will all be lost.

It is inconceivable that this should be passed for the devastation it will cause.

Yours faithfully



DAERA MARINE & FISHERIES DIVISION

06 FEB 2020

RECEIVED

4<sup>th</sup> February 2020

Marine Licensing Team,  
Marine & Fisheries Division,  
Dept of Agriculture, Fisheries & Rural Affairs  
1<sup>st</sup> Floor Klondyke Building,  
Cromac Avenue,  
BT7 2JA

Dear Sir/Madam

Re Islandmagee Gas Storage Project  
Marine Construction Licence Application 2019 – Consultation ML28-12

I have examined the public consultation documents and have attended meetings in relation to the above and wish to strongly object to the project and to the issuing of a Marine Construction Licence.

Islandmagee Energy / Infrastrata propose to create 7 underground caverns below Larne Lough in which to store natural gas.

I believe no evidence has been shown of the need for this project and that it is not only unnecessary but will cause huge negative environmental impact on land and sea, affecting both residents and wildlife.

One of my main concerns is around the discharge of hyper saline brine into the sea near Castle Robin. This will create a benthic dead zone. It will also affect an area which has recently been designated for Harbour Porpoises and have an impact on the food chain for these and other fish and mammals.

The area affected by the proposed project contains several Special Protected Areas, one of which is designed to offer protection to birds including the Roseate Tern which is an endangered species. The puffin colony will also be at risk.

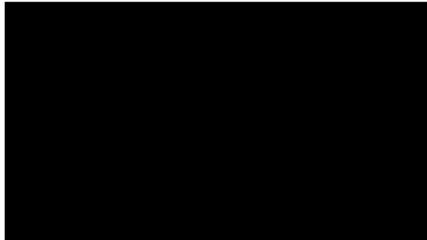
The Gobbins, Muck Isle and The Maidens are designated Areas of Special Scientific Interest which are likely to be negatively impacted by the proposed development. I am very concerned that the porpoises and dolphins which we see regularly in these waters may move or fail to thrive should this development be allowed to proceed.

On land I have serious worries about the impact of noise and traffic levels on my own wellbeing and safety and that of my family, other residents and visitors to the area. The present and future safety of the storage of gas in these caverns is a real concern, especially as my home and others lie in such close proximity to the development should it be allowed to proceed.

I strongly believe that a Public Enquiry should be ordered by the Department into this proposed development as can be done under Regulation 17 of the Water Abstraction and Impoundment Licensing Regulations (NI) 2006.

I trust that my concerns and those of many other objectors to this scheme will be fully taken into account as part of this consultation.

Yours faithfully,

A large black rectangular redaction box covering the signature area.A black rectangular redaction box covering contact information.



DAERA MARINE & FISHERIES DIVISION

06 FEB 2020

RECEIVED

Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Email: [Marinelicensingteam@daera-ni.gov.uk](mailto:Marinelicensingteam@daera-ni.gov.uk)

January 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

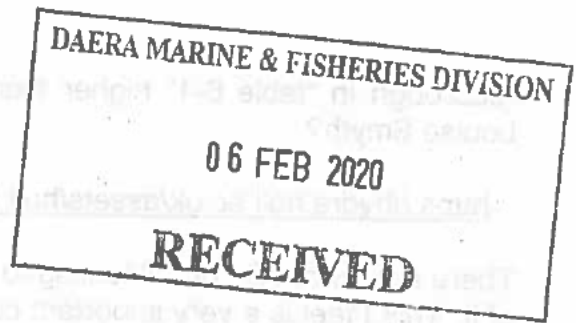
In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

Person

Please

I'm part of the Jordanstown Seals and go swimming in the sea around Port Muck and Jordanstown. The damage to the animals and countryside would be ~~terrible~~ <sup>terrible</sup> under normal operation. What would happen in the event of an <sup>industrial</sup> accident?

- I know companies always say they take best precautions but accidents can and do happen, eg BP oil well off coast of California and Japanese nuclear plant where earthquake/tsunami caused total failure, despite "best precautions".



3 February 2020

Marine Licensing Team  
Marine and Fisheries Division  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building  
Cromac Avenue  
Belfast  
BT7 2JA

To whom it may concern,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

I am writing to outline some of my concerns regarding the marine licence application by Islandmagee Energy Ltd.

After reading the reports published regarding the project I attended the public information meeting held in Islandmagee Gobbins Centre on Thursday 23 January 2020. I had a number of questions regarding some technical aspects of the reports; I was directed to speak to Martyn Garbutt (Costain) and Malcolm Brian (RPS) to have my questions answered. Although they were both very pleasant to speak with, neither of them were able to answer my questions regarding the hydrodynamic theory used for the brine dispersion modelling in the report. Moreover they both demonstrated a troubling lack of knowledge and understanding of the basic principles of physics and fluid dynamics, upon which the relevant theories would be based.

They were also unable to answer my questions regarding the construction of the caverns. Specifically they were unable to give a clear answer when asked about the pressure at different points in the leaching system, and I was in fact told that there would be "no pressure" in the caverns while they were being leached. This seems very unlikely to me. I feel that the pressure at different points in the system, particularly at the outlet, would be very important considerations in the modelling of the brine dispersion, and if this was not considered, the validity of the entire brine modelling report is thrown into question.

I was also told at the meeting that there would be no chemical elements present in the discharged brine, other than salt and water. This according to the brine dispersion report, section 6 "Table 6-1: Comparison of Non-Salt Components in Brine" is not the case. I am also concerned by the lack of elements found, when compared with the brine from Aldbrough, the full list of which can be seen in the thesis submitted by Katie Louise Smyth for her PhD at the University of Hull "Effects of hypersalinity on the behaviour, physiology and survival of commercially important North Sea crustaceans" (2011). I am therefore curious, were there no other elements found in the salt at Islandmagee? Why is the copper content quoted for

Aldrough in "table 6-1" higher than stated in the aforementioned thesis by Katie Louise Smyth?

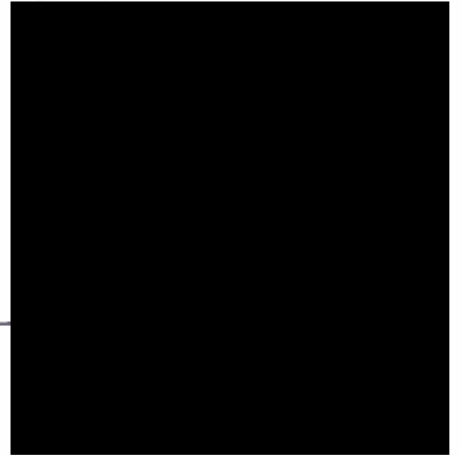
<https://hydra.null.ac.uk/assets/null:7015a/content>


There are no details of antifouling to be used in the project, and the possible impacts of it. This I feel is a very important consideration for a marine licence application and should include any antifouling on equipment used during the construction phase of the project.

I was concerned with the large discrepancies in section 1.1 "Brine Dispersion Modelling Approach" of the brine modelling report. The significant disparity between the modelled tidal current speeds and the recorded speed was accounted for by the claim that "storm events were recorded during the field measurement period". I feel that by not including wind speeds at the water surface for the time in question, a correlation is merely speculation, and the disparity might just as easily have been caused by inaccuracies in the modelling process since no evidence has been provided to the contrary.

I feel that the section of the reports regarding underwater noise is inadequate. Appendix C - Underwater Noise is a document full of unlabelled and unexplained graphs. What are these graphs relating to? Many of them show noise levels of over 160dB, which would be an extreme noise level. I think since underwater noise levels can have a significant impact on marine mammals and may carry onto land and affect residents in the area, it is important that any underwater noise emissions related to the project should be accurately modelled and presented in an ordered and clear way with maps showing the origin of the noises, to allow the impacts of these emissions to be assessed.

Yours sincerely





DAERA MARINE & FISHERIES DIVISION

06 FEB 2020

RECEIVED

3 February 2020

Marine Licensing Team  
Marine and Fisheries Division  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building  
Cromac Avenue  
Belfast  
BT7 2JA

Dear Sir/Madam

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

I am writing to voice my objection to the proposed marine licence for Islandmagee Energy Ltd.

I am not satisfied that there is enough detailed information in their report to safeguard against the risk of catastrophic marine damage. Along with the ethical considerations of killing marine life I am also concerned about the detrimental effects of any such pollution on the marine business of which I am an employee.

Two points of particular concern for me are the brine disposal forecasting and noise pollution. The modelling for the brine disposal does not seem to take into account the cumulative and spreading effect of the brine on changing/returning tides. There are graphs showing underwater noise levels over 160Db. However there is no indication of where this noise will originate and what area it will affect. Will it be heard ashore?

Yours faithfully





DAERA MARINE & FISHERIES DIVISION  
06 FEB 2020  
RECEIVED

Post: Marine Licensing Team  
Marine and Fisheries Division  
Department of Agriculture, Environment, and Rural Affairs  
1st Floor Klondyke Building  
Cromac Avenue  
Belfast BT7 2 JA

Email: [Marinelicensingteam@daera-ni.gov.uk](mailto:Marinelicensingteam@daera-ni.gov.uk)

January 2020

Dear Sir/Madam

Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a concerned member of the Islandmagee community, I believe there should be a public inquiry, as under Regulation 17 of the Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the *Public Consultation for the following reasons:*

There is no political support for this proposal. All of the Larne Lough Councillors on Mid and East Antrim Borough Council have voiced their opposition to the project and our local MLA, John Stewart, has too.

Furthermore, with no evidence of need for this project proven, it is not clear for what purpose the gas storage is to be used: The recent introduction of building regulation banning gas central heating boilers from newbuilds would indicate that there will be less of a demand for gas storage in future would indicate the uselessness of these caverns.

If it is to be used to fuel Ballylumford Power Station, this station has no long-term future in a zero carbon society. The new power station owners stated that gas power generation is only a "midterm role". With Infrastrata extending the construction period of the caverns to 7 years this eats heavily into this "midterm" period where the storage would not be available; if it is to be used as a strategic gas reserve for Northern Ireland/ROI, the distribution network is sorely lacking and hence makes this pointless; and if it is to be used as a strategic gas reserve for GB, surely situating the storage on that side of the sea would make much more sense, especially as there is existing permission for Cheshire Energy to construct storage caverns at Preesall and work has not commenced. Indeed, the both the Infrastrata Gas Caverns project and the project to reverse flow SNIP did not appear on the 4th PCI list as both "did not prove overall benefits outweigh costs."

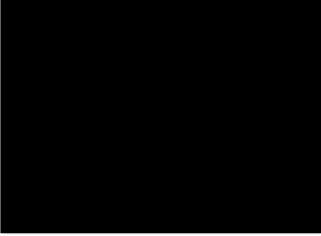
-It is already known that Islandmagee is a local beauty spot, frequented by people from all over Ireland. With the completion of The Gobbins, the strategy to develop local tourism has gone global. Further industrial development, with the ensuing heavy traffic, pollution, noise and disruption, runs counter to this strategy.

By the Company's own admission, the development of the caverns would have a significant effect on local wildlife, discharging up to 1000 cubic metres of hypersaline brine per hour, 24 hours a day and 7 days a week for 4 years into the sea only 450 metres from the shore near Castle Robin, creating a benthic dead zone in a designated Special Area of Conservation for Harbour Porpoises, as well as affecting a number of nearby designated Areas of Specific Scientific Interest and proposed SPAs. Further species affected include otters, kittiwakes, razorbills, many crustaceans, and sand eels, the main food source for puffins, whose only breeding colony on the Northern Ireland mainland is at the Gobbins. There is no tested information on the supposed marine survey, or verified information of the "dead zone" in regard of size or saline strength of the zone during slack water periods at high or low water.

In relation, again by the Company's own admission, the construction will create few jobs, and even fewer permanent jobs, most of these in specialized sectors for which local skills will be unsuitable, and necessitating bringing in staff from further afield. This is not something that will create local jobs and benefit the local economy. ent prospects. At the same time it will negatively affect local livelihoods already established, such as those at The Gobbins, those involved in local tourism, fishermen, and others.

I trust you will examine these issues and concerns and listen appropriately to the many voices opposed to this project. This project is neither "sensible" or "necessary".

Yours sincerely





DAERA MARINE & FISHERIES DIVISION

06 FEB 2020

RECEIVED

5/2/2020

Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

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In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

1. on speaking to the Finance officer of Infrastrata on Thursday 23rd January at the Cobbin Centre, he was able to tell me that the Company had not made a profit in the past 2 years, and in fact has not made a profit in the past 10 years! - so where is the finance coming from for this project?

2. should the project fail, once it has started, due to lack of finance, who will finish it and how be liable for all costs to make it safe?

3. what is the need for Gas storage to the people of Northern Ireland?

As it currently stands - not every household has access to the Natural Gas and I live approx 200 yards from the existing pipeline and cannot avail of it!

Just how many people in N.I can avail of Natural Gas?

4. This was the company who drilled for oil in Carrickfergus and left the site at Woodburn Dam a mess! No new planting done and a Security Bill of approx £200k, so what guarantees would we have that they would make good any promises to fix our land after the project is completed?

5. There have been recent tremors on the Antrim Coast, so have these been investigated and a new GSNI survey done?

If so - has this been published?

6. As some salt mines in Carrickfergus have already collapsed. how can we be sure this won't happen again?

7

Proposal of a "one way system" during production of the project?

How is this going to impact upon farmers and also residents who may have twice the distance to travel, making it more expensive in fuel and also wear and tear on vehicles. Will there be compensation for this?

The low Road was recently re-surfaced at an approx cost of 1/2 a million pounds - so given the heavy machinery that will be using the Road - who will foot the bill to have it repaired again?

A new primary school is due to be built on the low Road - opening approx September 2021.

A one way system will have a high impact on parents dropping off and collecting their children - never mind Builders and Contractors trying to get the School built!

8

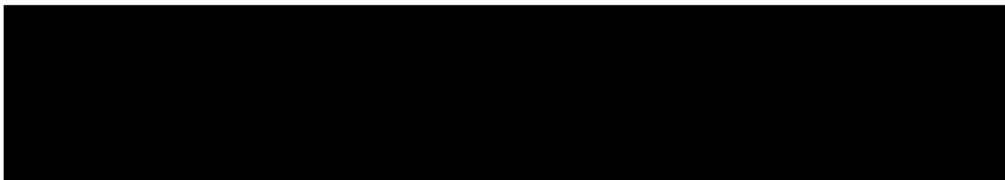
The Gabbins Centre was built at considerable cost and has been a very popular tourist attraction, so if the brine water that will be pumped back into the sea destroys the food chain - what happens to the nesting birds - seals, porpoises etc??

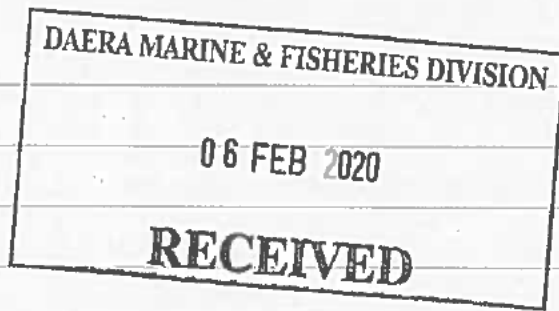
They are a large part of the Gabbins work, and if there is no wildlife to see - this would have a massive negative impact on the Gabbins Centre and tourism in general in Islandmagee.

9 In light of the recent purchase of Harland + Wolff by  
Infrastrata, how can ~~the~~<sup>we</sup> be assured that the best  
economic and environmental decisions will be made?  
i.e. there is no conflict of interest!  
After all, the last thing our new assembly would need  
would be another "RHI" scandal and Enquiry!

Islandmagee is an area of outstanding beauty - but we  
have already had to suffer the building of the new Power  
Station and the Interconnector - so enough is enough!  
Time to stop Raping and Pillaging our land.  
In short - leave Islandmagee alone.

yours sincerely





4 February 2020

Dear Ais

### ISLANDMAGEE ENERGY MARINE LICENCE CONSULTATION

I wish to object strongly to the above project & to the granting of a Marine Licence.

I have lived in Islandmagee all my life (59 years) & cannot believe that this project is even being considered for development.

I have grave concerns regarding the safety of drilling seven caverns in Larne Lough & what may be stored there in the future.

I live between the drilling pad/area & the beaching point. I am concerned about the traffic going by my property during construction. I am concerned about the effect the project may have on the value of my home.

Larne Lough is ~~also~~ a Special Protected Area. I have spent all my life using Larne Lough for fishing & boating. I do not feel safe at the thought of proposed drilling of caverns underneath where I fish & sail - how can this be safe? How can this not affect any marine life?

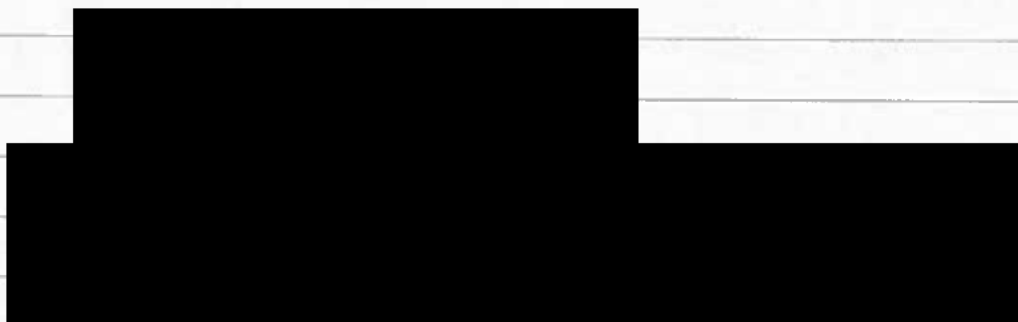
The Government have decided 3-2-2020 that a Climate Emergency Committee be formed - on indication that this proposed project should be severely scrutinised before proceeding further.

A number of MLAs are not in favour of this project - there is no evidence of need for gas storage. They are also concerned about the safety issue.

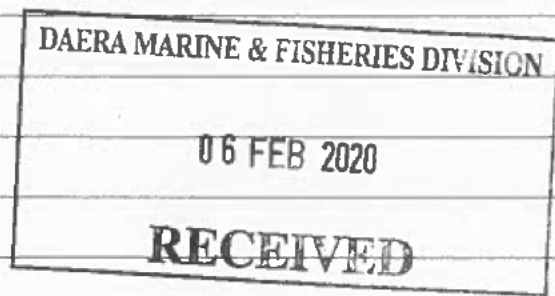
This project will not benefit myself, my family, my home, my surroundings or the environment in Lerne Lough / Browns Bay / Portmuck.

Please do not grant any further permissions in this project.

Yours faithfully

A large black rectangular redaction box covers the signature area, obscuring the name and any handwritten notes or dates.

Kef Marine Construction Licence Application  
2019 Consultation ML 28-12 by Infrastrata / Islandmoqee Energy.



3 Feb 2020

Dear sir/madam

My name is [REDACTED] and I am 12 years old. I live in Islandmoqee with my mum, dad and brother.

I hate the fact Infrastrata want to make 7 huge gas caverns close to where I live. I go to portmuck nearly every night in the summer to jump into the sea with my friends, we often see fish, jelly fish, seals and dolphins when we go out in canoes.

Every summer I make new friends with people who are on holiday here or do pier jumping with me. It makes me happy to live here. I do not understand why people want to destroy where we live and the creatures that live there too, just for money. It is our future which will be destroyed by the greed of a few people now. I would like to ask why these gas caverns are needed, is it just to make a few rich people even richer, then it must be stopped. please look at the picture and I hope it makes you decide not to give them a marine licence.

Thank you

[REDACTED]

06 FEB 2020

RECEIVED

4<sup>th</sup> February 2020

**Marine Licensing Team,  
Marine & Fisheries Division,  
Dept of Agriculture, Fisheries & Rural Affairs  
1<sup>st</sup> Floor Klondyke Building,  
Cromac Avenue,  
BT7 2JA**

Dear Sir/Madam

**Re Islandmagee Gas Storage Project  
Marine Construction Licence Application 2019 – Consultation ML28-12**

I have examined the public consultation documents and have attended meetings in relation to the above and wish to strongly object to the project and to the issuing of a Marine Construction Licence.

Islandmagee Energy / Infrastrata propose to create 7 underground caverns below Larne Lough in which to store natural gas.

I believe no evidence has been shown of the need for this project and that it is not only unnecessary but will cause huge negative environmental impact on land and sea, affecting both residents and wildlife.

One of my main concerns is around the discharge of hyper saline brine into the sea near Castle Robin. This will create a benthic dead zone. It will also affect an area which has recently been designated for Harbour Porpoises and have an impact on the food chain for these and other fish and mammals.

The area affected by the proposed project contains several Special Protected Areas, one of which is designed to offer protection to birds including the Roseate Tern which is an endangered species. The puffin colony will also be at risk.

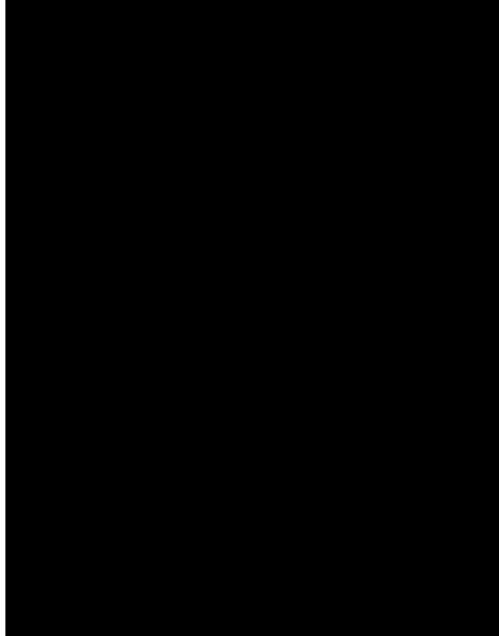
The Gobbins, Muck Isle and The Maidens are designated Areas of Special Scientific Interest which are likely to be negatively impacted by the proposed development. I am very concerned that the porpoises and dolphins which we see regularly in these waters may move or fail to thrive should this development be allowed to proceed.

On land I have serious worries about the impact of noise and traffic levels on my own wellbeing and safety and that of my family, other residents and visitors to the area. The present and future safety of the storage of gas in these caverns is a real concern, especially as my home and others lie in such close proximity to the development should it be allowed to proceed.



I strongly believe that a Public Enquiry should be ordered by the Department into this proposed development as can be done under Regulation 17 of the Water Abstraction and Impoundment Licensing Regulations (NI) 2006.

I trust that my concerns and those of many other objectors to this scheme will be fully taken into account as part of this consultation.



DAERA MARINE & FISHERIES DIVISION

06 FEB 2020

RECEIVED

04/02/2020

Dear Sir/Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML28\_12**

With reference to the Marine Construction Licence Application 2019 Consultation ML 28\_12 by Islandmagee Energy/Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine due to the above process, I have examined the public consultation documents and I have many objections about this project and the Marine Construction Licence.

No evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts; both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the company of the dead zone in a designated Special Area of concern, which has been designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impound (Licencing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise!

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

There are many reasons why I object to the marine licence being granted, firstly in general and secondly in particular to Infrastrata/Islandmagee Energy.

My objections are:

- The massive amounts of hypersaline brine being pumped into the sea. We are very lucky in Islandmagee to have such a fabulous abundance of sea life and birds. In fact, one of the reasons people come to see The Gobbins is in order to see these animals (porpoise, puffins etc.). If the brine kills the food supply then these creatures will either die too or else they will leave, which will have a negative effect to our tourism. There have also been Common Skate in these waters (which despite the name is not common).
- The area around Islandmagee has been marked as a Designated Special Area of Concern, as well as Areas of Specific Scientific Interests. It is important that we preserve these areas. Larne Lough is also an important site for breeding Roseate Terns, which are one of the rarest breeding birds in the UK and Ireland. Last year nearly £400,000 was spent on restoration and conservation at the reserve site and we were lucky to have a pair of chicks hatch there last summer.
- With climate change becoming more dominant in the news (today, Stormont Assembly has declared a climate emergency) our government has backed the creation of an independent body to protect our environment. Ofgem has also unveiled plans to ensure there are no gas heating systems in houses by 2050, this is coupled by gas central heating banned from new builds by 2025, which is only 5 years time! Islandmagee Energy have themselves stated in their documents

- that it will take much longer than this for construction to finish (I believe it has gone up from 7 years to 9 years). Islandmagee is a rural area and as such doesn't have the road capacity which may be required in order to facilitate this. This traffic will also have to travel past at least one of the two primary school sites which may pose safety risks for the children.
- Added onto this the fact that Claire Perry MP has stated that the UK and Northern Ireland have gas security, and once the gas is here there is nowhere for it to go without spending taxpayer's money to get the SNP reversed.
- There have been concerns over the safety of the caverns both at construction and in the long term. HSENI have deemed it to be a high risk project. If something does go wrong where does that leave homeowners? If home insurance prices rise and housing prices fall due to people living in close proximity to this site, where does that leave homeowners? There is also a geological fault line which runs through Larne Lough. In Carrickfergus not too long ago, part of the New Line had to be abandoned due to sink holes from salt extracted caverns.

My additional reasons are:

- Infrastructure have, whether on purpose or because they didn't understand the process, lied about so many things: government backing; the number of caverns they are having; they stated on numerous occasions that they were construction ready and had all necessary licences in place including FULL MARINE LICENCE.
- They have said that they engage with local public, when they have hardly any advertising, especially re consultation events, one even being advertised in local paper the day after the event. If not for the objectors sharing the information there possibly wouldn't have been anyone at these events. There has been an abundance of miscommunications and lack of information being shared.
- They have stated that there will be lots of new jobs created for local people, but then in consultation process have stated that there will actually only be a few jobs for locals as they will have to bring in teams of specialists to complete the project.
- During the consultation process they have simply not had the answers to the queries and legitimate questions and fears that the local community have put to them.

Due to these reasons, the local people of Islandmagee have no trust or faith in them.



DAERA MARINE & FISHERIES DIVISION

06 FEB 2020

RECEIVED

01-02-2020

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Having lived in Islandmagee all of my life I feel the possibility of this project will do absolutely nothing but disrupt the entire area. It would create severe environmental issues both on land and at sea. A.S.S.Is and S.P.A. would be corrupted. Feeding and breeding grounds for currently resident species of bird, porpoise, dolphin etc would be destroyed by the toxic saline being discharged **FOR FOUR YEARS!!!!**

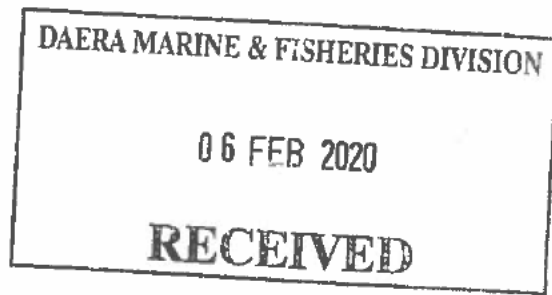
It would also have a potential detrimental effect on tourism, leisure pursuits and local fishing industry. The safety of the caverns is also one of my concerns, both in construction and long term.

As no evidence of need for storage has been provided in the public consultation documents, I believe there should be a public enquiry as Under Regulation 17 of the Water Abstraction and Impoundment(Licensing) regulations (N.I.) 2006. The Dept has the power to order an inquiry to evaluate representations

**WE ARE RUNNING OUT OF TIME TO SAVE OUR PLANET!!!**

Yours Sincerely,





Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

28 January 2020

Dear Sir / Madam,

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As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons –

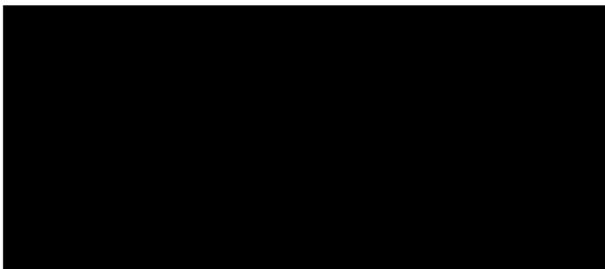
My wife has run the local riding school for approximately 18 years. We are situated between the Hollow road and the Browns Bay road. We are proud to employ local staff and have regular repeat clientele. Additionally we get a lot of summer and tourist trade.

I would be extremely concerned about the pollution and devastation that this concentrated brine would cause. My children swim at Browns Bay and Portmuck and I would worry about the state of the beaches, sea life and fauna after 4-6 years of constant brine output.

Noise and increased HGV movement are also concerns of mine. Our roads are busy enough and dangerous enough without this proposed extra traffic. It is getting more and more hazardous to use the roads for walking/cycling and riding, there are mostly no footpaths and only worn away verges. Our road infrastructure is under pressure as it is.

I also believe that we have no need for gas storage as we have an adequate supply that copes under the most extreme of conditions.

Please acknowledge receipt of this letter.



06 FEB 2020

RECEIVED

Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
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In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

Personal objection here

Please sign when complete

I'm extremely concerned about the environmental impact on wildlife and pollution.

This is a disastrous idea and we should pull out all the stops to prevent this.





DAERA MARINE & FISHERIES DIVISION

06 FEB 2020

RECEIVED

*Insert your name*  
*Insert your address*

Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
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Email: [Marinelicensingteam@daera-ni.gov.uk](mailto:Marinelicensingteam@daera-ni.gov.uk)

January 2020

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In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

*Personal objection here*  
*Please sign when complete*  
The disastrous effect that this work will have on the environment when it is completely unnecessary. Once the environment is damaged it cannot be retrieved.

The Antipum coast is a valuable asset encouraging tourism, a source of income for all. It is incomprehensible that this should be destroyed for little gain.

This project must not be passed

Sincerely

What was the point in spending millions to restore the Gobbins bath if it is to be destroyed at a stroke of a pen?

DAERA MARINE & FISHERIES DIVISION

06 FEB 2020

**RECEIVED**

Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building, Cromac Avenue,  
Belfast, BT7 2JA

Objection to Islandmagee Energy (infrastrata) Marine licence Application ML28\_12

Dear Sir/Madam

I have read through the supporting documents and wish to file an objection to the proposed Marine Licence submitted by Islandmagee Energy. The Government has now made a commitment to phasing out the use of Fossil Fuels which makes the need to store gas for profit an unnecessary damaging industry. Also the public consultation document does not indicate any need for gas storage in NI.


I also object to the proposed dead zone which will be created during the formation of the salt caverns. This area of coastline is rich in marine life including sea birds that rely on the area for their food supply. This area is also a designated SPA, recently designated for Harbour Porpoise and I believe the proposal will have an adverse effect on the harbour porpoise. The nearby Gobbins breeding seabird colony will also be adversely affected, this is the only land based puffin colony in NI.

Tourism is a growing economic benefit to the local economy and this gas storage facility and the potential damaging impact on the local wildlife will have a negative impact. The Local Council has spent millions of the local peoples rates on the Gobbins Coastal path, the main attraction being the seabird, this will be affected by the dead zone created.

The benefit of the storage to the local economy is very limited as the labour for the creation of the caverns will be done by outside contractors and the facility will be run by a skeleton staff.

I also have health and safety concerns of gas storage due to the local fault and recent tremors, also the Northern Ireland Health and Safety Executive deem the project a high risk. The project has limited resources and relies totally on grants and shareholders and should something go wrong will not be able to recompense or but right any damage.

I also would like to request that a public enquiry be held

R  


DAERA MARINE & FISHERIES DIVISION

06 FEB 2020

RECEIVED

3-2-2020

Dear Mrs

ISLANDMAGEE ENERGY MARINE LICENCE CONSULTATION

I wish to object strongly to the above projects & to the granting of a Marine Licence.

I have lived in Islandmagee for the past 30 years & cannot believe that this project is even being considered for development.

I have grave concerns regarding the safety of this project. I live between the wellpad site & the proposed boathouse. I am concerned about the traffic which will go past my house during construction. I am concerned about the value of my property being affected. I have spent a lot of time about the shore where the Wellpad is. Lorne Lough is a Special Protected Area - how can drilling be allowed to proceed in a SPA? I am concerned about safety in the area when drilling commences - I spend time at the shore, fishing & boating & am concerned about what will be happening underground.

This project is deemed "high risk" by NI Health & Safety Executive. The Government have now announced that a Climate Emergency Committee be set up. How can this licence

(our environment)  
be granted when this has now become a major priority?

A number of MLAs do not support this project - they are aware of the safety issues & the prospect of the environment around Larne Lough / Brans Bay / Portmuck being destroyed.

Surveys have been carried out - short term conclusions have been made - but we do not know for sure what exactly will happen if this project goes ahead.

I would urge the Dept of Agriculture, Environment & Rural Affairs to look very closely about what is being proposed - do not be afraid to challenge the company involved - delay if necessary until you are sure that there will 100% not be any safety or environmental impact.

Yours faithfully

[Redacted signature]

3rd February 2020

DAERA MARINE & FISHERIES DIVISION

06 FEB 2020

RECEIVED

DAERA Marine and Fisheries Division  
2<sup>nd</sup> Floor  
Klondyke Building  
Cromac Avenue  
Belfast  
BT7 2JA

REF ML28\_12

Dear Sir/Madam,

**RE: The application for Islandmagee Gas Storage Facility**

Having read through this application and some of the mass of accompanying literature, we have some questions that have not been properly answered at the information days.

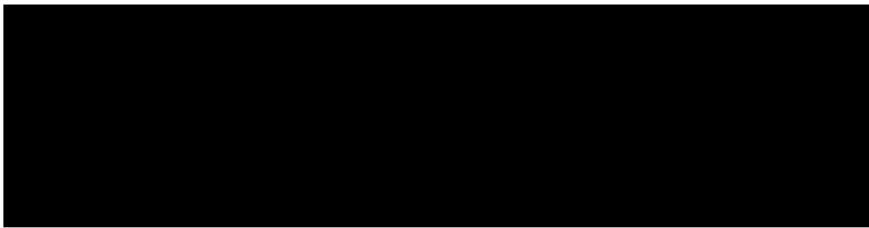
1. Are the caverns all under Larne Lough as stated in the project title?
2. Re 3.4.2 on page 16 (40 on full document). It states that "cavern locations are estimates and some may even be located under land". This point was firmly denied at the open days. Are the caverns drawings not misleading at best? This was not mentioned at planning stage!!
3. On attachment #7A (page8) or page 32 of full document it states an option (iii) of overground/visible twin 450mm pipes running over the foreshore, would this be permitted?
4. Re 3.5.7. Press and internet. It states in this section that "regular updates" on the project were "distributed to all the residents throughout Islandmagee" via the ICDA's newsletter. This statement is simply untrue and misleading.
5. Re 3.5.8 (page32) or page 58 on whole document. I must disagree with the statement that "The issues raised during public and stakeholder consultation have been addressed."
  - A. We have never been guaranteed that blasting will not take place at Castle Robin.

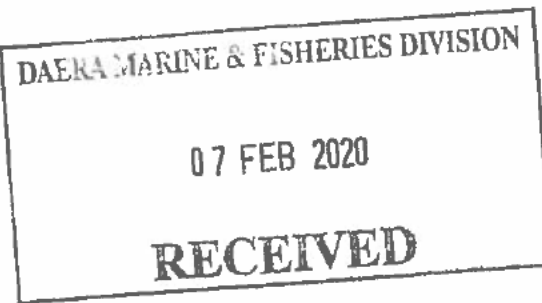
B. It seems that no notice has been taken of the request to place salinity monitors close to Portmuck to account for the tidal eddy.

Our house at Portmuck was damaged after blasting for the Gas Pipeline back in 1995, so we are very worried about this possibility.

Awaiting your reply.

Yours Sincerely





Dear Sir/Madam

Ref Islandmagee Energy Marine Licence Consultation ML 28\_12

I have read and studied the public consultation documents with reference to the Marine Construction Licence application 2019 Consultation ML 28-12 from Islandmagee Energy /Infrastrata, proposing to create 7 underground caverns by mining under Larne Lough for the storage of natural gas, creating an associated marine infrastructure to perform seawater extraction to dispose of brine removed from the caverns by solution mining and wish to object to the project and the Marine Construction Licence.

There has been no evidence of need for this proposal has been circulated for public consultation.

I think this project is unneeded and unwarranted given the very detrimental environmental impacts in size, dangers with underground caverns, the seriously damaging impact on land floral and fauna, sea life and sea fauna, considering the admittance by the company of a dead zone in dSAC, designated for the Harbour Porpoise.

I request without delay a public enquiry as Under Regulation 17 of the Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006, the Department has the power to do this to evaluate representations made as a result of a public consultation exercise. Please protect our shared environment.

Additionally I wish to object to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

1. Put simply this project will destroy the marine habitat by pumping 1000s of m3 of brine per hour per day for 4 years into sea 450 m from shore destroying the marine habitat for all users in the food chain from micro organisms up to humans. This is not a great prospect for anyone of us.
2. We are trying to reduce carbon emissions not create more environmentally damaging infrastructures to facilitate the burning of fossil fuels. Man already has succeeded in managing gas storage in considerably less destructive ways. This is an unnecessarily high risk project as per the Northern Ireland Health and Safety Executive position.
3. There is thus, no need at all for this project as evidenced in the public consultation documents. There is not even large employment being created.



4. No matter what employment was created, many jobs are going to be under threat /destroyed in the Tourist industry, fishing, hospitality, B and Bs, outdoor pursuits, the list is long, this should not be allowed. These people should protected not threatened.
5. There is a threat to the those pursuing leisure activities on the beaches , coastal areas and on the sea.
6. Those that live in the surrounding areas have not requested this and I know many who are extremely stressed, depressed, myself included at the proposed destruction of this beautiful environment in Islandmagge and beyond now seriously threatened by this proposal and the company behind it.



DAERA MARINE & FISHERIES DIVISION

07 FEB 2020

RECEIVED

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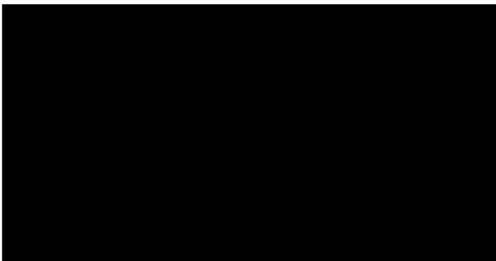
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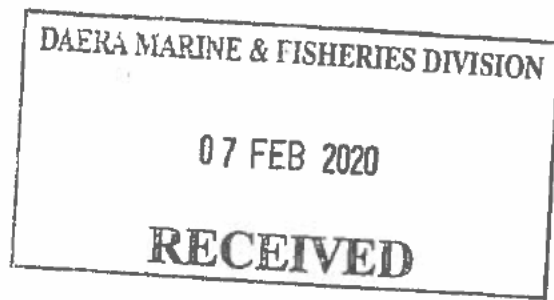
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Marine Licensing Team  
Marine and Fisheries Division  
Department of Agriculture, Environment and Rural Affairs  
1<sup>st</sup> Floor Klondyke Building  
Cromac Avenue  
Belfast  
BT7 2JA

5 February 2020

Dear Sir/Madam,

Ref : Islandmagee Energy Marine license Consultation ML28-12

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Firstly no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and the sea, with the admission by the Company of the dead zone in the DSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction License as per the Public Consultation for the following reasons:

Firstly I would like to advise that I have only very recently found out about this proposed project, I find the local consultation certainly was not very well publicized, I'm sure there are a lot more who are unaware and who would be objecting to this proposal like myself.

It is well known that we don't have a need for Gas as renewable energy is fast undercutting coal and gas and for the first time in UK over the third quarter of 2019 renewable energy sources provided more electricity to UK homes and businesses than fossil fuels – even within the last few days the Northern Ireland Assembly has declared a climate emergency and backed the creation of an independent body to protect the environment – what Infrastrata are proposing will destroy the environment – NO NEED FOR GAS STORAGE AT ISLANDMAGEE!!!

I am concerned for our local Marine ecology with the vast amounts of brine that will be pumped into the sea killing marine life in the immediate area and creating a knock on effect on the food chain. Do you think it is acceptable to disturb the marine life and the food chain to birds in the area which may never recover if driven away from the area due to lack of food and also consider the birds/marine life that may come to the area if this does not get the green light, surely our environment is worth preserving, do you not agree?

It is well known that we have frequent visitors in this area such as Harbour Porpoises, Bottlenose Dolphins, Seals, Humpback Whales and Sei Whale, what impact will that have on them continuing to visit?

Surely the disruption to the whole area when drilling commences will have a disturbing effect on the nearby Isle of Muck which is an Area Of Special Scientific interest, this is only 2KM away from the discharge site – do you realize these seabirds on the Isle are sensitive to human disturbance? Will it drive them away?

The Isle of Muck is home to the 3<sup>rd</sup> largest colony of Cliff nesting seabirds in Northern Ireland, how can such a project anywhere near this Isle even be considered?

Will this project not drive all marine life and birds away from the Islandmagee shoreline? And the Puffins nearby, what effect will this whole project have on these birds?

My concerns also would be regarding the caverns safety now and in the future, how long are the caverns expected to store gas for?

Can you please advise how you investigated if this area is populated by bats as I have seen quite a few in the evenings in the area and would be concerned again that disruption may drive them away?

Swan Island which is not far away from Magheramorne boat yard on Larne Lough near to the proposed site of the caverns hosts breeding Roseate Terns which are Britain's rarest breeding Tern, what impact will this have on them? I certainly cannot anything positive in effecting their food chain, the birds will just leave the area, would that not be the case?

We also have Kingfishers living on Larne Lough, they also will be affected, do you know that we had these birds on the Lough?

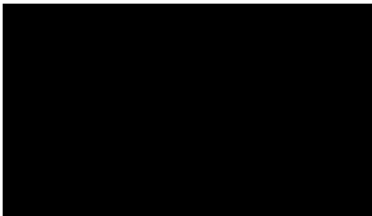
Are you aware also that there are Otters on Larne Lough? I am concerned also for their survival if this loughs food chain is disturbed to all the wildlife in this area!

I also would be interested in finding out what the responses from the Geological Survey of Northern Ireland were, can you advise where I can see these or please send me information regarding this.

Which parts of the environmental statements have been amended, is it possible can you please send me or tell me where I can view these amendments?

I cannot understand how from a survey which was conducted over only for 18 hours from July to September can constitute an accurate survey as to numbers of birds in the area feeding, flying overhead and foraging... also the early part of the breeding season was not surveyed so I cannot see that this report is a very accurate one, can you? This surely cannot be used as an accurate measurement of birdlife on our lough, would it not have been better to have had a more thorough report over a much longer period of time to get a more accurate measurement of birdlife in this area?

I really am objecting very strongly to this proposal to gain a marine license and will be very saddened if this for some bizarre reason gets the green light.



DAERA MARINE & FISHERIES DIVISION

07 FEB 2020

RECEIVED

Marine Licensing Team

Marine and Fisheries Division

Department of Agriculture, Environment and Rural Affairs

1<sup>st</sup> Floor Klondyke Building

Cromac Avenue

Belfast

BT7 2JA

5 February 2020

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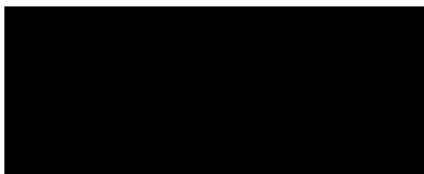
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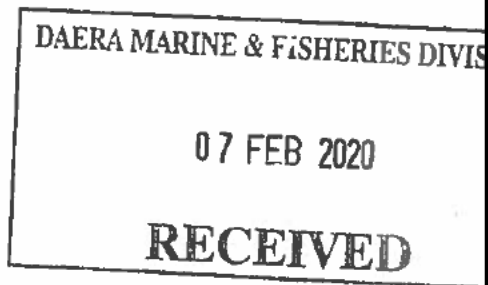
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I really am objecting very strongly to this proposal to gain a marine license and will be very saddened if this for some bizarre reason gets the green light – **NO GAS STORAGE IN ISLANDMAGEE PLEASE!!!**





05/02/2020

Dear Sir / Madam,

With reference to the Marine Construction Licence application 2019 Consultation ML28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable sea water abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining. I have examined the public consultation documents and I wish to strongly object to the project and the Marine Construction Licence.

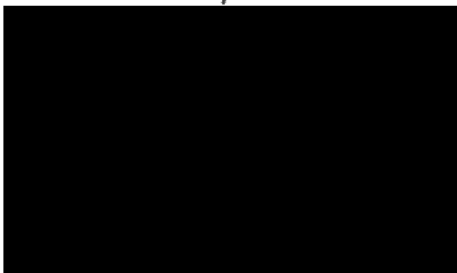
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In the meantime, I wish to strongly object to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons.

We as a family have loved and respected this area for decades and we are asking you to do the same. The brine being pumped into it would be a disaster for wildlife and I just don't believe it would happen anywhere else. Children love to jump in at the Pier at Portmuck, it's a past time that has went on for years. Does this now have to stop because of what you are doing?

Yours faithfully



FEB 2020

RECEIVED

Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Email: [Marinelicensingteam@daera-ni.gov.uk](mailto:Marinelicensingteam@daera-ni.gov.uk)

January 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

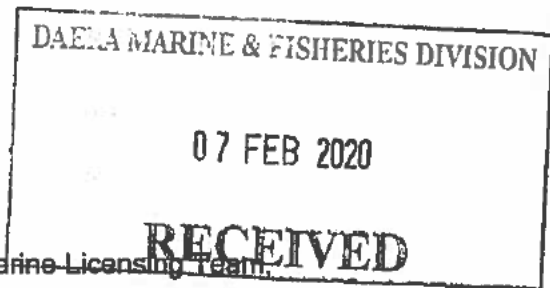
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In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

The Damage it will do to the marine life  
and threat to the Sea birds and their feeding  
grounds. There are many protected species eg  
Porpoises/otters/dolphins and they could be  
displaced. This will happen because of the  
1000m<sup>3</sup> of hypersaline Brine that will be  
pumped and discharged per hour per day. (24,000m<sup>3</sup>  
of toxic brine per day) creating a dead zone.  
The area was recently designated for harbour  
purposes as a Special Area of Conservation. It is  
also the only Northern Island based breeding  
puffin colony and it is near to the discharge  
area it is a threat to their feeding grounds  
My husband & I are directors of the Brown  
Bay Hope House Cancer Charity that purchase  
a House on Browns Bay Beach Front  
for our Patients to be able to Recover  
from their cancer treatments and it is  
because of the Tranquil surroundings of  
the beachfront Property and wild  
life that we chose this Property  
and the effects that this gas Storage  
will have on the beautiful Sea  
Front is very depremental. We  
object very strongly



Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building, Cromac Avenue,  
Belfast, BT7 2JA

**Objection to Islandmagee Energy (infrastrata) Marine licence Application ML28\_12**

Dear Sir/Madam

I have read through the supporting documents and wish to file an objection to the proposed Marine Licence submitted by Islandmagee Energy. The Government has now made a commitment to phasing out the use of Fossil Fuels which makes the need to store gas for profit an unnecessary damaging industry. Also the public consultation document does not indicate any need for gas storage in NI.

I also object to the proposed dead zone which will be created during the formation of the salt caverns. This area of coastline is rich in marine life including sea birds that rely on the area for their food supply. This area is also a designated SPA, recently designated for Harbour Porpoise and I believe the proposal will have an adverse effect on the harbour porpoise. The nearby Gobbins breeding seabird colony will also be adversely affected, this is the only land based puffin colony in NI.

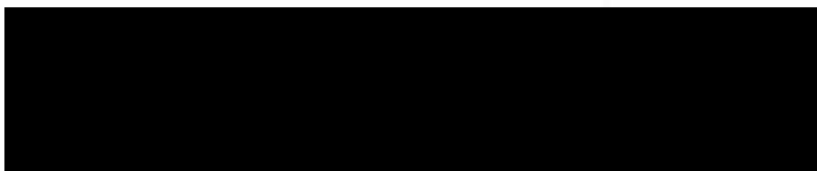
Tourism is a growing economic benefit to the local economy and this gas storage facility and the potential damaging impact on the local wildlife will have a negative impact. The Local Council has spent millions of the local peoples rates on the Gobbins Coastal path, the main attraction being the seabird, this will be affected by the dead zone created.

The benefit of the storage to the local economy is very limited as the labour for the creation of the caverns will be done by outside contractors and the facility will be run by a skeleton staff.

I also have health and safety concerns of gas storage due to the local fault and recent tremors, also the Northern Ireland Health and Safety Executive deem the project a high risk. The project has limited resources and relies totally on grants and shareholders and should something go wrong will not be able to recompense or but right any damage.

I also would like to request that a public enquiry be held

Regards



DAERA MARINE & FISHERIES DIVISION

07 FEB 2020

RECEIVED

Marine Licensing Team

Marine and Fisheries Division

Department of Agriculture Environment and Rural Affairs

1<sup>st</sup> Floor Klondyke Buildings

Cromac Avenue

Belfast BT17 2JA

23 January 2020

Dear Sir/Madam

**Ref Islandmagee Energy Marine Licence Consultation ML28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML28\_12 by Islandmagee Energy/Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas which includes the associated marine infrastructure to enable seawater extraction and subsequent discharge of brine from the creation of caverns by solution mining.

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Firstly no evidence of need for the proposal has been released for public consultation and I believe the project to be unnecessary with huge environmental impacts both in the scale and associated risks of the underground caverns the environmental impact on land and sea with the admission by the company of the dead zone in a dSAC designated for Harbour Porpoise.

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In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons.

There is a potential discharge of up to or in excess of 1000 cubic metres of hypersaline brine per hour per day which amounts to 24000 cubic metres of toxic brine being discharged per 24 hour day for four or more years into the sea.

This discharge would take place just some 450 metres from the land shore near to Castle Robin at Islandmagee and would result in the creation of a benthic dead zone.

The North Channel into which the hypersaline brine would be discharged is a Designated Special Area of Conservation and has recently been designated for Harbour Porpoise.

The proposed abstraction/discharge area also falls within the Proposed East Coast (NI) Marine Special Protected Area boundary.

The discharge area is also near to the only land based breeding Puffin colony in Northern Ireland

Larne Lough is a Special Protected area and is home to the endangered Roseate Tern which has been red flagged as an endangered species and is also a priority species.

There is a huge potential negative impact on the natural food chain resulting in the death of sea life and prey species in turn posing a threat to life to sea birds and potential destruction of feeding grounds. Concerns also arise that a number of protected species such as porpoise, otter and dolphin could be displaced

The aforementioned potential abstraction/discharge also sits in proximity to a number of designated Areas of Special Scientific Interest including The Gobbins, Muck Isle and The Maidens.

This project will also have a devastating effect on the people and local communities who have availed of the natural beauty and surroundings for centuries. I myself have walked in the area of Browns Bay and Skernaghan Point for almost 50 years. My Children and Grandchildren have been born in this area and have also enjoyed Browns Bay beach, coastline and sea swimming as my spouse and I have done before them.

A large number of people my family included enjoy a diverse range of leisure pursuits in the area including walking, fishing, diving, fishing and swimming. The livelihoods of commercial fishermen and lobster fishermen will also be seriously impacted upon negatively.

The downside to the local tourist industry cannot be underestimated, The Causeway Coastal Route ,The Gobbins Cliff Walk, Game Of Thrones locations, The White Harbour and the soon to be reopened Blackhead Path all stand threatened by this project.

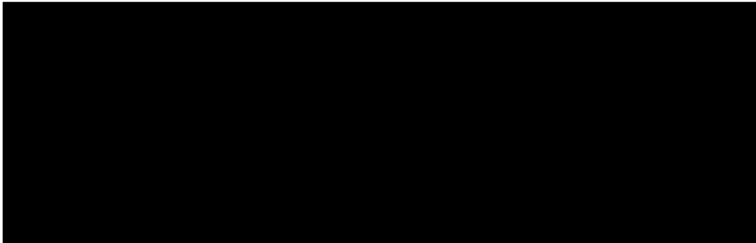
The project has also been adjudged by the Northern Ireland Health and Safety Executive to be a high risk project and thus this raises serious concerns over the gas caverns and their environs both now and in the longer term.

The granting of licences facilitating any form of gas storage facility on this or any other scale in my local area causes me to reflect on the negative effect on my peace of mind concerning the project and also on my physical well being both now and in the future.

I must add that there is little or no strategic positive outcome in this area with regard to employment with clear indicators from the public consultation documents that only a skeleton staff would be required to operate the facility after construction.

Finally the public consultation documents have provided no evidence for the need of the gas storage facility as described in this project.

Yours sincerely





DAERA MARINE & FISHERIES DIVISION

07 FEB 2020

RECEIVED

Marine Licensing Team

Marine and Fisheries Division

Department of Agriculture Environment and Rural Affairs

1<sup>st</sup> Floor Klondyke Buildings

Cromac Avenue

Belfast BT17 2JA

23 January 2020

Dear Sir/Madam

**Ref Islandmagee Energy Marine Licence Consultation ML28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML28\_12 by Islandmagee Energy/Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas which includes the associated marine infrastructure to enable seawater extraction and subsequent discharge of brine from the creation of caverns by solution mining.

I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly no evidence of need for the proposal has been released for public consultation and I believe the project to be unnecessary with huge environmental impacts both in the scale and associated risks of the underground caverns the environmental impact on land and sea with the admission by the company of the dead zone in a dSAC designated for Harbour Porpoise.

As a member of the public with serious concerns I believe that there should be a public inquiry as under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006* the department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons.

There is a potential discharge of up to or in excess of 1000 cubic metres of hypersaline brine per hour per day which amounts to 24000 cubic metres of toxic brine being discharged per 24 hour day for four or more years into the sea.

This discharge would take place just some 450 metres from the land shore near to Castle Robin at Islandmagee and would result in the creation of a benthic dead zone.

The North Channel into which the hypersaline brine would be discharged is a Designated Special Area of Conservation and has recently been designated for Harbour Porpoise.

The proposed abstraction/discharge area also falls within the Proposed East Coast (NI) Marine Special Protected Area boundary.

The discharge area is also near to the only land based breeding Puffin colony in Northern Ireland

Larne Lough is a Special Protected area and is home to the endangered Roseate Tern which has been red flagged as an endangered species and is also a priority species.

There is a huge potential negative impact on the natural food chain resulting in the death of sea life and prey species in turn posing a threat to life to sea birds and potential destruction of feeding grounds. Concerns also arise that a number of protected species such as porpoise, otter and dolphin could be displaced

The aforementioned potential abstraction/discharge also sits in proximity to a number of designated Areas of Special Scientific Interest including The Gobbins, Muck Isle and The Maidens.

This project will also have a devastating effect on the people and local communities who have availed of the natural beauty and surroundings for centuries. I myself have walked in the area of Browns Bay and Skernaghan Point for almost 50 years. My Children and Grandchildren have been born in this area and have also enjoyed Browns Bay beach, coastline and sea swimming as my spouse and I have done before them.

A large number of people my family included enjoy a diverse range of leisure pursuits in the area including walking, fishing, diving, fishing and swimming. The livelihoods of commercial fishermen and lobster fishermen will also be seriously impacted upon negatively.

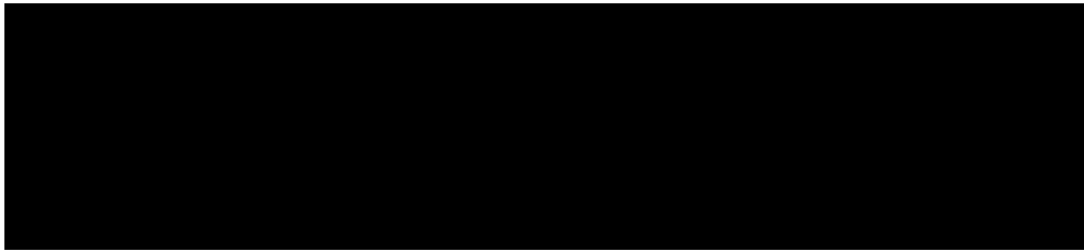
The downside to the local tourist industry cannot be underestimated, The Causeway Coastal Route ,The Gobbins Cliff Walk, Game Of Thrones locations, The White Harbour and the soon to be reopened Blackhead Path all stand threatened by this project.

The project has also been adjudged by the Northern Ireland Health and Safety Executive to be a high risk project and thus this raises serious concerns over the gas caverns and their environs both now and in the longer term.

The granting of licences facilitating any form of gas storage facility on this or any other scale in my local area causes me to reflect on the negative effect on my peace of mind concerning the project and also on my physical well being both now and in the future.

I must add that there is little or no strategic positive outcome in this area with regard to employment with clear indicators from the public consultation documents that only a skeleton staff would be required to operate the facility after construction.

Finally the public consultation documents have provided no evidence for the need of the gas storage facility as described in this project.



DAERA MARINE & FISHERIES DIVISION

07 FEB 2020

RECEIVED

06/02/20

Dear Sir / Madam,

With reference to the Marine Construction Licence application 2019 Consultation ML28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable sea water abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining. I have examined the public consultation documents and I wish to strongly object to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposed project has been made available for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone which will be created in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public enquiry, as under Regulation 17 of the Water Abstraction and Impoundment Licensing Regulations (NI) 2006, the Department has the power to order a public enquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

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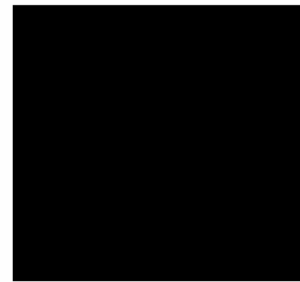
Damage and harm to the local wildlife, Coastal birds and sea life.

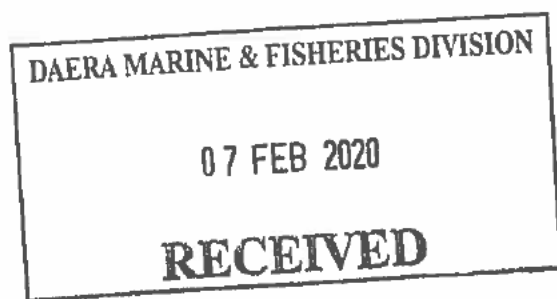
Damage and harm to a place of outstanding beauty which attracts thousands of tourists each year who visit Whitehead, Gobbins path etc..... at the beginning of Antrim coast line and the trail of Game of Thrones enthusiast begins.

Harm to the residents and visitors of Islandmagee who visit often with their children and family dogs whom enjoy to swim in the harbour of Portmuck or Brown's bay etc....

In this day and age where climate change is so highly featuring in our everyday lives surely this project goes against the protection of our local environment and future of this planet for the next generation to enjoy. We need to stop this before it is too late. Let's learn from our mistakes and avoid another one.

Yours faithfully





**Marine Licensing Team**

**Marine and Fisheries Division**

**Department of Agriculture, Environment and Rural Affairs**

**1<sup>st</sup> Floor Klondyke Building**

**Cromac Avenue**

**Belfast**

**BT7 2JA**

**5 February 2020**

**Dear Sir/Madam,**

**Ref : Islandmagee Energy Marine license Consultation ML28-12**

**With reference to the Marine Construction License application 2019 Consultation ML28-12 by Islandmagee Energy/Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction License.**

**Firstly no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and the sea, with the admission by the Company of the dead zone in the DSAC, designated for Harbour Porpoise.**

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction License as per the Public Consultation for the following reasons:

Firstly I would like to advise that I have only very recently found out about this proposed project, I find the local consultation certainly was not very well publicized, I'm sure there are a lot more who are unaware and who would be objecting to this proposal like myself.

It is well known that we don't have a need for Gas as renewable energy is fast undercutting coal and gas and for the first time in UK over the third quarter of 2019 renewable energy sources provided more electricity to UK homes and businesses than fossil fuels – even within the last few days the Northern Ireland Assembly has declared a climate emergency and backed the creation of an independent body to protect the environment – what Infrastrata are proposing will destroy the environment – NO NEED FOR GAS STORAGE AT ISLANDMAGEE!!!

I am concerned for our local Marine ecology with the vast amounts of brine that will be pumped into the sea killing marine life in the immediate area and creating a knock on effect on the food chain. Do you think it is acceptable to disturb the marine life and the food chain to birds in the area which may never recover if driven away from the area due to lack of food and also consider the birds/marine life that may come to the area if this does not get the green light, surely our environment is worth preserving, do you not agree?

It is well known that we have frequent visitors in this area such as Harbour Porpoises, Bottlenose Dolphins, Seals, Humpback Whales and Sei Whale, what impact will that have on them continuing to visit?

Surely the disruption to the whole area when drilling commences will have a disturbing effect on the nearby Isle of Muck which is an Area Of Special Scientific Interest, this is only 2KM away from the discharge site – do you realize these seabirds on the Isle are sensitive to human disturbance? Will it drive them away?

The Isle of Muck is home to the 3<sup>rd</sup> largest colony of Cliff nesting seabirds in Northern Ireland, how can such a project anywhere near this Isle even be considered?

Will this project not drive all marine life and birds away from the Islandmagee shoreline? And the Puffins nearby, what effect will this whole project have on these birds?

My concerns also would be regarding the caverns safety now and in the future, how long are the caverns expected to store gas for?

Can you please advise how you investigated if this area is populated by bats as I have seen quite a few in the evenings in the area and would be concerned again that disruption may drive them away?

Swan Island which is not far away from Magheramorne boat yard on Larne Lough near to the proposed site of the caverns hosts breeding Roseate Terns which are Britain's rarest breeding Tern, what impact will this have on them? I certainly cannot anything positive in effecting their food chain, the birds will just leave the area, would that not be the case?

We also have Kingfishers living on Larne Lough, they also will be affected, do you know that we had these birds on the Lough?

Are you aware also that there are Otters on Larne Lough? I am concerned also for their survival if this loughs food chain is disturbed to all the wildlife in this area!

I also would be interested in finding out what the responses from the Geological Survey of Northern Ireland were, can you advise where I can see these or please send me information regarding this.

Which parts of the environmental statements have been amended, is it possible can you please send me or tell me where I can view these amendments?

I cannot understand how from a survey which was conducted over only for 18 hours from July to September can constitute an accurate survey as to numbers of birds in the area feeding, flying overhead and foraging... also the early part of the breeding season was not surveyed so I cannot see that this report is a very accurate one, can you? This surely cannot be used as an accurate measurement of birdlife on our lough, would it not have been better to have had a more thorough report over a much longer period of time to get a more accurate measurement of birdlife in this area?

I really am objecting very strongly to this proposal to gain a marine license and will be very saddened if this for some bizarre reason gets the green light.

Kind Regards

A solid black rectangular box used to redact the sender's name and contact information.

DAERA MARINE & FISHERIES DIVISION

07 FEB 2020

RECEIVED

Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building, Cromac Avenue,  
Belfast, BT7 2JA

Objection to Islandmagee Energy (infrastrata) Marine licence Application ML28\_12

Dear Sir/Madam

I have read through the supporting documents and wish to file an objection to the proposed Marine Licence submitted by Islandmagee Energy. The Government has now made a commitment to phasing out the use of Fossil Fuels which makes the need to store gas for profit an unnecessary damaging industry. Also the public consultation document does not indicate any need for gas storage in NI.

I also object to the proposed dead zone which will be created during the formation of the salt caverns. This area of coastline is rich in marine life including sea birds that rely on the area for their food supply. This area is also a designated SPA, recently designated for Harbour Porpoise and I believe the proposal will have an adverse effect on the harbour porpoise. The nearby Gobbins breeding seabird colony will also be adversely affected, this is the only land based puffin colony in NI.

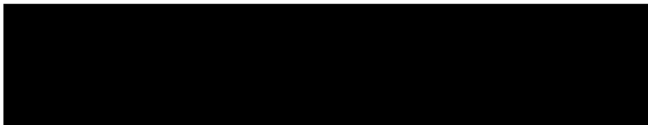
Tourism is a growing economic benefit to the local economy and this gas storage facility and the potential damaging impact on the local wildlife will have a negative impact. The Local Council has spent millions of the local peoples rates on the Gobbins Coastal path, the main attraction being the seabird, this will be affected by the dead zone created.

The benefit of the storage to the local economy is very limited as the labour for the creation of the caverns will be done by outside contractors and the facility will be run by a skeleton staff.

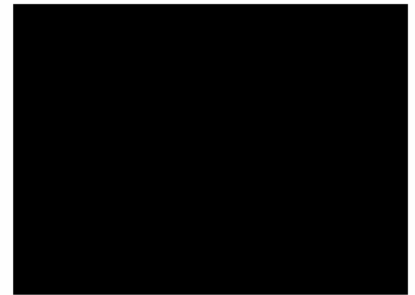
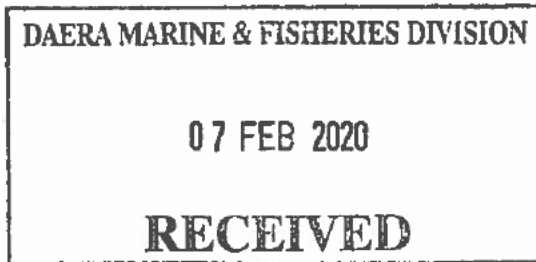
I also have health and safety concerns of gas storage due to the local fault and recent tremors, also the Northern Ireland Health and Safety Executive deem the project a high risk. The project has limited resources and relies totally on grants and shareholders and should something go wrong will not be able to recompense or but right any damage.

I also would like to request that a public enquiry be held

Regards







Marine Licensing Team

Marine and Fisheries Division

Department of Agriculture, Environment and Rural Affairs

1<sup>st</sup> Floor Klondyke Building

Cromac Avenue

Belfast

BT7 2JA

5 February 2020

Dear Sir/Madam,

Ref : Islandmagee Energy Marine license Consultation ML28-12

With reference to the Marine Construction License application 2019 Consultation ML28-12 by Islandmagee Energy/Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction License.

Firstly no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and the sea, with the admission by the Company of the dead zone in the DSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

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It is well known that we don't have a need for Gas as renewable energy is fast undercutting coal and gas and for the first time in UK over the third quarter of 2019 renewable energy sources provided more electricity to UK homes and businesses than fossil fuels – even within the last few days the Northern Ireland Assembly has declared a climate emergency and backed the creation of an independent body to protect the environment – what Infrastrata are proposing will destroy the environment – NO NEED FOR GAS STORAGE AT ISLANDMAGEE!!!

I am concerned for our local Marine ecology with the vast amounts of brine that will be pumped into the sea killing marine life in the immediate area and creating a knock on effect on the food chain. Do you think it is acceptable to disturb the marine life and the food chain to birds in the area which may never recover if driven away from the area due to lack of food and also consider the birds/marine life that may come to the area if this does not get the green light, surely our environment is worth preserving, do you not agree?

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The Isle of Muck is home to the 3<sup>rd</sup> largest colony of Cliff nesting seabirds in Northern Ireland, how can such a project anywhere near this Isle even be considered?

Will this project not drive all marine life and birds away from the Islandmagee shoreline? And the Puffins nearby, what effect will this whole project have on these birds?

My concerns also would be regarding the caverns safety now and in the future, how long are the caverns expected to store gas for?

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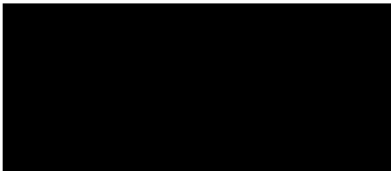
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I really am objecting very strongly to this proposal to gain a marine license and will be very saddened if this for some bizarre reason gets the green light – **NO GAS STORAGE IN ISLANDMAGEE PLEASE!!!**



Insert your name  
Insert your address

DAERA MARINE & FISHERIES DIVISION

07 FEB 2020

RECEIVED

Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Email: [Marinelicensingteam@daera-ni.gov.uk](mailto:Marinelicensingteam@daera-ni.gov.uk)

January 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

Will cause harm to the amenities of nearby residents due to major concern of fluctuating under ground pressure, swelling and subsidence of adjacent ground.

Due to major concern of gas leakage/escapement via ground fissures of adjacent ground.

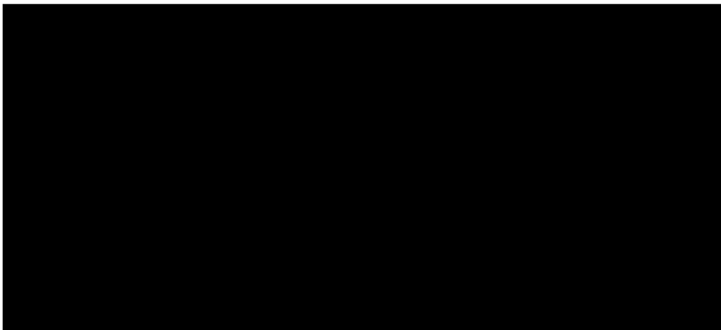
Cause major concern of potential purchasers of nearby residential properties.

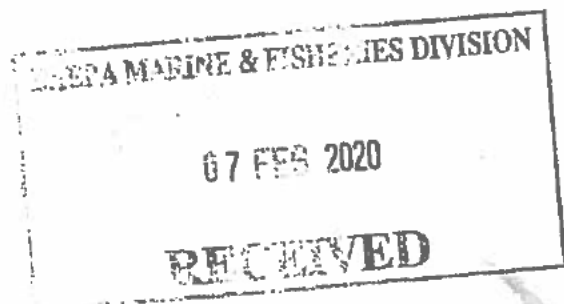
Is incompatible with surrounding land/sea use. This land is traditional agricultural, private residency and associated port/fishing ground. The concern of ground swelling and subsidence of adjacent ground will affect the safety of local farmers and livestock.

The hypersaline brine discharge will locally destroy the existing marine environment and affect local water usage/extraction.

No noise/dust impact assessments have been made available for air borne/ground transmission for both construction/normal operation phases. Therefore no assessment can be made of any noise/dust nuisance impact.

Yours faithfully





Dear Sir/Madam,

Ref: Islandmagee Marine Licence Consultation ML2812

I am writing to you to register my objections to this project and licence, because of:

Safety concerns in short, long terms

Deemed a high risk project

No evidence of need

Impact on lives - leisure, tourism & industry

Threat to marine life and Specially Protected areas, also designated area of Specific Scientific Interest

As a member of the public with serious concerns, I believe there should be a Public inquiry as under Regulation 17 of the Water Abstraction and Impoundment Licensing Regulations (N.I.) 2006. The department has the power to order a Public inquiry for the purpose of evaluating representations made

as a result of a public consultation  
exercise.



DAERA MARINE & FISHERIES DIVISION

10 FEB 2020

RECEIVED

Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building, Cromac Avenue,  
Belfast,  
BT7 2JA.

4<sup>th</sup> February 2020

Dear Sir / Madam,

Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

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In the meantime, I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

Firstly, there is unquestionably no reason to justify the need for 7 gas caverns in Larne Lough and pumping a repulsive amount of poisonous brine out in to our beautiful marine which we



are extremely lucky to enjoy. Instead of relishing in this beauty, you will be creating a benthic dead zone if this barbaric construction was to proceed, submitting to the greed of shareholders. The Gobbins, Muck Isle and The Maidens are Areas of Specific Scientific Interest of which this storage project will greatly disturb and threaten any scientific discoveries.

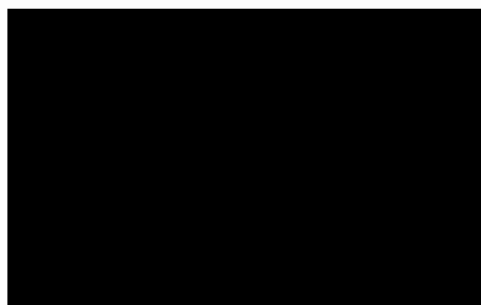
Secondly, the Gas Cavern storage project greatly threatens the wildlife surrounding Islandmagee, home to Harbour Porpoise, Seals, Sea Otters, Puffins, dolphins and more. The project will cause long term detriment and displacement of these protected species of which we are unbelievably lucky to have. The project will cause indefinite death to many sea-life and prey species therefore impacting on the natural food chain as well as the threat to many sea birds and their feeding grounds.

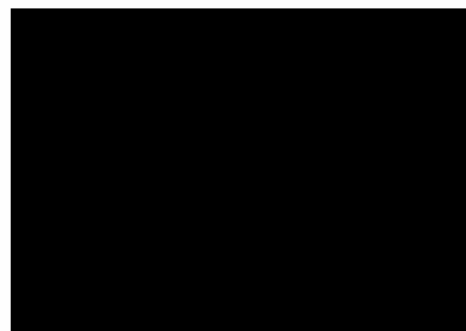
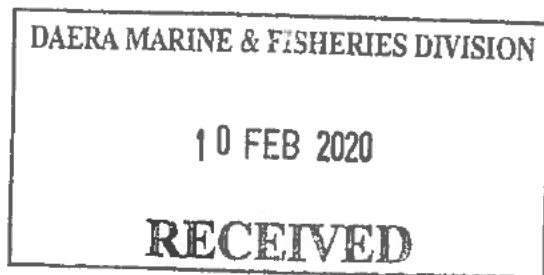
Thirdly, there will be a huge impact on people. Islandmagee is a booming natural tourist attraction and should therefore be protected and preserved. Thousands of international tourists come to the island to delight in the rich abundance of biodiversity found which is currently found here. This project will have a profound negative impact on tourism, the Gobbins Project, local industry, fishermen, lobster fishermen, all of which provides employment to many local residents. I greatly believe we need to save the area and wildlife for future generations of whom we are trying to teach the importance of looking after our environment.

Finally, Islandmagee is the reason why I moved to Northern Ireland. 2 years ago I came with my partner on a holiday and just fell in love with Browns Bay, Ferris Bay, Portmuck and the Gobbins. We stayed outside for hours just watching the wildlife and making friends with the local residents. A year later we relocated from London to Northern Ireland because of this and we are now waiting for our perfect home to purchase on or close by Islandmagee.

Please do not destroy this beautiful area for the unnecessary need of Gas Caverns. I left London to escape all the pollution which surrounds it to come and enjoy a place of natural beauty for me and hopefully my future children.

Kind regards,





Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

5<sup>th</sup> February 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

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As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons –

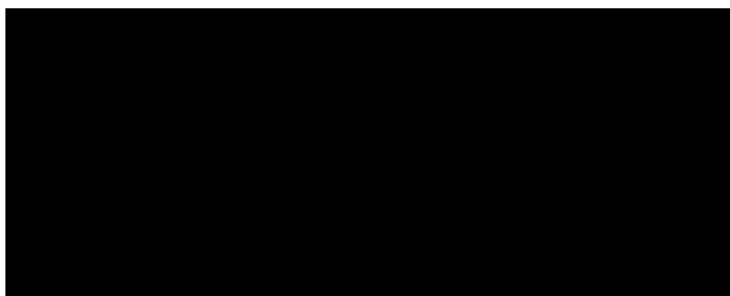
I live in very close proximity to this proposed project. What concerns me most is the location of these caverns. I would like to request where I can find a detailed drawing of the exact

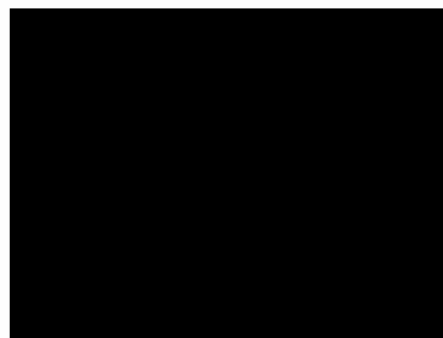
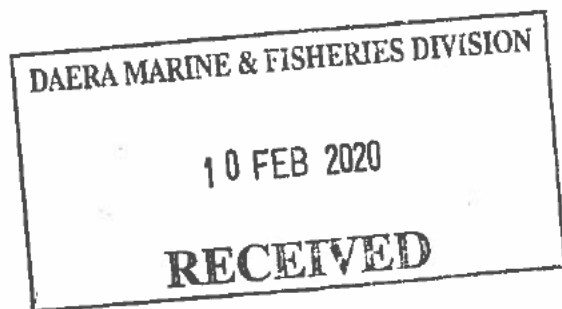
location of the caverns, Islandmagee Energy/Infrastrata states that they could be located under land.

I am also concerned about the safety of such a vast project. On the 18<sup>th</sup> December 19 and as recently as 26<sup>th</sup> January this year there were reported earthquakes off Rathlin and Ballycastle.

I would like to also request a copy of any HSENI responses to Islandmagee Energy/Infrastrata during the consultation stage.

I look forward to hearing from you..





Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

5<sup>th</sup> February 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons –

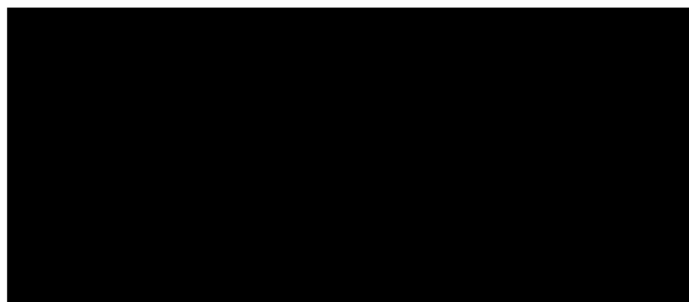
I live in very close proximity to this proposed project. I would like to know where exactly these vast caverns will be located. I would like to request an exact drawing of the proposed location as I believe some could be located under land.

As the Environmental Statement has been amended, where is it possible to view what aspects have changed? Is it possible to request the amended copy?

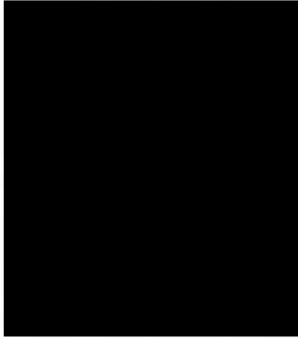
I am also very concerned about the underwater noise levels. On reading the documents I see the rock excavation could reach 179DB. As harbour porpoise are affected by levels above 173DB, this is unacceptable. When doing my own research I discovered that levels above 140DB produce a risk of lethal injury to mammals and fish.

I feel this is an unnecessary project, with the potential to cause destruction and harm to the environment.

I look forward to your response.



DAERA MARINE & FISHERIES DIVISION  
24 FEB 2020  
RECEIVED



Marine Licensing Team  
Marine and Fisheries Division  
Department of Agriculture, Environment and Rural Affairs  
1<sup>st</sup> Floor Klondyke Building  
Cromac Avenue  
Belfast  
BT7 2JA

20 February 2020

Dear Sir/Madam

**Ref: Islandmagee Energy Marine Licence Consultation ML 28 12 objection letter sent 15 January 2020, via Royal Mail "signed for" ref: KX 00988817 2GB**

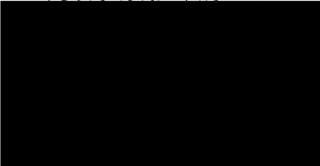
Following on from my letter dated the 14 January which I have attached, I have had no correspondence regarding this being received.


I am also very concerned that the public consultation has been extended until March, to appease the Islandmagee Energy Company.

As a member of the public with serious concerns I still believe there should be a public enquiry.

I look forward to hearing from you and also letting me know why this has been extended.

Yours faithfully





Marine Licensing Team  
Marine and Fisheries Division  
Department of Agriculture, Environment and Rural Affairs  
1st Floor Klondyke Building  
Cromac Avenue  
Belfast  
BT7 2JA

marinelicensingteam@daera-ni.gov.uk

14 January 2020

Dear Sir/Madam

**Ref: Islandmagee Energy Marine Licence Consultation ML 28 12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy/Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

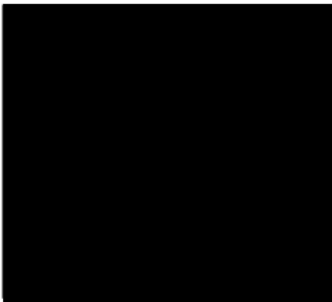
In the meantime, I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

I object to this scheme as it is not needed and would have a negative impact on the sea life in the surrounding area there are migrating birds return to this area every year to feed and if the sea water in the area is damaged these birds will be affected.


Also, the tourism in this area is excellent and the amount of work lorries and equipment will have a negative impact on the area.

There have been negative reports on other gas caverns in the UK surrounding the long-term safety they have on the surrounding area, and with the collapse of the salt mine a few years ago in Carrickfergus this is very worrying if the same thing were to happen again.

Yours faithfully







Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

20<sup>th</sup> February 2020

Dear Sir/Madam

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

This project will have a huge negative effect on tourism in Islandmagee. The Gobbins visitor attraction has brought thousands of tourists and the cliff path walk is greatly enhanced by the presence of birds such as puffins and marine mammals such as harbour porpoise which will be displaced due to the impact on the sea from the hyper saline brine discharged a short distance away.

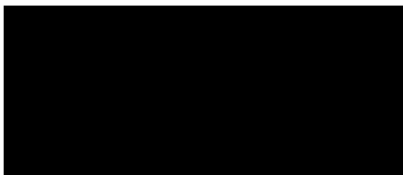
The UK is currently encouraging the move to less reliance on fossil fuels – therefore to grant a licence to a project which is in stark contrast to this stance is unjustifiable. I can find nothing in the Public Consultation documents which shows any effort has been made to address climate change issues.

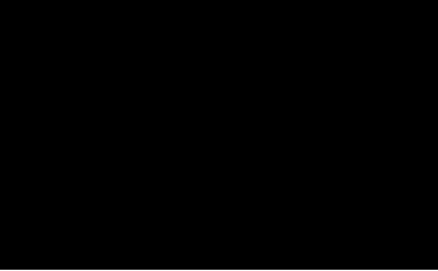
The updated environmental surveys carried out in 2019 are very limited. Original surveys which I would think should be updated eg: baseline salinity, haven't been done and are severely out of date. Can you explain this please?

I am also concerned that the seismic surveys may not have been accurately interpreted regarding the suitability of the salt strata. I am aware that data obtained for this company's previous project at Woodburn Forest in Carrickfergus proved to be completely inaccurate. Has DAERA had the raw data analysed in order to confirm the company's interpretation of the data is correct?

I look forward to receiving your reply.

Yours faithfully

A large black rectangular redaction box covering the signature area.



Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue, Belfast,  
BT7 2JA

Email: [Marinelicensingteam@daera-ni.gov.uk](mailto:Marinelicensingteam@daera-ni.gov.uk)

11th March, 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata PLC, for the proposal to create 7 underground caverns by solution mining below Larne Lough / Islandmagee, for the storage of natural gas, I have taken advantage of the extended consultation period to properly review all the reports which have been submitted for the Departments inspection.

Being a member of the public with no background in Marine Engineering, I am having difficulty understanding what exactly has been applied for, what will be the subject of further licensing? And where exactly will this all take place?

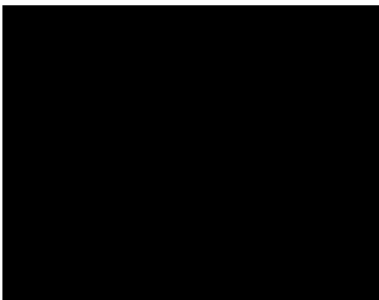
The submitted report for this application is in itself very vague as I see a reference in the application document stating the caverns being located under the land rather than below Larne Lough, I would like to know which caverns will be located under the land, and where is that land located, (Grid References) and which caverns will be located under Larne Lough, and where exactly under Larne Lough will these caverns be located, again Grid References. The application itself states "the exact location is as yet unknown". My question here is, does anybody know? If not, how can the Department even consider this application when so much vital criteria is unknown, including the exact cubic capacity of the caverns, and the exact depth the caverns will be underground, as this seems to range from 1350m to 1500m below sea level, but the application refers to 1700m, all very unclear.

The accompanying plan attached to the application is not very clear by way of it has no scale, no North indication, no identifiable landmarks from which to ascertain even a general location, also, again, no Grid Reference for the location of the caverns. The advertisement published in the Belfast Telegraph concerning this application simply refers to Larne Lough, Islandmagee and Castle Robin; it does not include the dSAC for Harbour Porpoise or the ASSI Portmuck or ASSI Gobbins all of which will be affected by this project.

There seems to be three different construction methods mentioned in this application, surely there should be one clearly defined construction method. Do the designers have a definitive plan? Who will take full overall responsibility for the lifetime maintenance of the caverns once Islandmagee Energy Ltd have finished with them and they are no longer of commercial benefit to them? I can see no clear programme for the decommissioning of these caverns, what is the precise plan for this?

This application should either be refused or the applicant should be asked to submit further information and a fresh application.

Thank you for your attention on this matter and I look forward to receiving your response at your earliest convenience.



DAERA MARINE & FISHERIES DIVISION

23 MAR 2020

RECEIVED

16<sup>th</sup> March 2020

Marine Licensing Team  
Marine and Fisheries Division  
Department of Agriculture, Environment and Rural Affairs  
1<sup>st</sup> Floor Klondyke Building  
Cromac Avenue  
Belfast BT7 2JA

Dear Sir/Madam

**RE: Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining.**

Due to the public consultation period having been extended and having had more time to study the documentation submitted by Infrastrata, I wish to make the following more detailed objections:

#### **Procedural Issues**

1. No updated non-technical environmental impact summary has been submitted for the public to read and easily understand. Given the huge impact that this proposed project will have on the roads and marine environment in Islandmagee this is not acceptable. The environmental information which accompanies the application is spread over six separate documents. The non-technical summary relates only to an Environmental Statement produced in 2010. This is outdated and contrary to the legal requirements for EIA.
2. Exact location of the gas caverns? There is no chart, plan or map showing exactly where the caverns will be located. It is mentioned in the application document that the caverns may be drilled under the land rather than under the Lough, where exactly will this be? Will they be under the water or under the land? This is a requirement of regulation 12(1) of the Marine Works (EIA) Regulations and is therefore a serious omission especially in terms of how it could affect homes and property.
3. The applicant is requesting a license for a 10 year period, yet the Departmental guidance states that licences will only be granted for a maximum of three years? This inconsistency regarding length of time period for licence must be clarified by the Department.

#### **Environmental Concerns**

4. Since fishing is such an important part of our local economy and a legitimate use of the sea, how can this project even be considered in these areas of special scientific interest where

there is such a huge variety of species of sealife and breeding seabirds. As we have seen from the responses from the NI Marine Task Force and RSPB, the environmental information presented by Infrastrata confirms that this project will greatly adversely impact Portmuck and the Gobbins habitats and this cannot be denied or minimised. It is quite simply not acceptable in my opinion.

5. The applicant has not included any consideration of Portmuck ASSI or The Gobbins ASSI in their assessment of impact to designated sites. This again shows how outdated the application is given how important Tourism is to our local economy and the importance of the Gobbins Cliff top path providing the opportunity to see rare birds and other sea life. Again this is a legitimate use of our sea and the Gas Caverns project is totally incompatible with this.
6. Previous earthquakes in Larne Lough have not been mentioned nor has the impact of underwater noise and vibration from the drilling of the proposed caverns. Given the history of Larne Lough and the fact that it was formed as a result of a geological fault line this is an issue which must be seriously considered in terms of safety of residents and property.

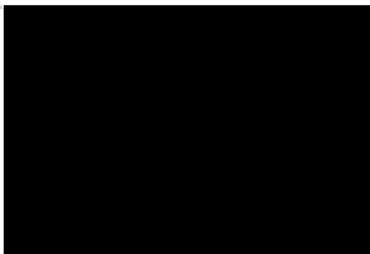
Infrastrata cannot guarantee that this drilling will not produce earth tremors or destabilise the structures of peoples homes in Islandmagee. No recognition of or willingness to address or reassure residents regarding these very legitimate concerns has been offered by the Company to my knowledge.

I have listed just some of the reasons why this project should not be allowed to proceed in Islandmagee. There are no doubt many other areas of concern. This project has nothing to offer our Community except destruction and displacement of wildlife. I honestly cannot see any benefits that it can bring to our unique peninsula and for that reason it should not be granted a marine license.

I hope you will take all these points into consideration. At the public consultation sessions I was not at all impressed with representatives of the applicant who displayed no willingness whatsoever to discuss residents' concerns and the information they provided appeared very basic and out of date.

I would be very grateful if you would acknowledge receipt of this letter.

Yours sincerely



DAERA MARINE & FISHERIES DIV

23 MAR 2020

RECEIVED

20<sup>th</sup> March, 2020

Marine Licensing Team  
Marine Fisheries Division  
Klondyke Building  
Cromac Avenue  
Malone Lower  
BELFAST  
BT7 2JA.

Dear Sir / Madam

Re: Proposed Gas Cavens at Islandmagee.

Further to my previous letter, I would like to add the following points, some of which I have addressed before.

1. There does not seem to be any plan or map showing where exactly the cavens would be located and possibility of being under land.
2. No actual description although references made to "detailed design phase".
3. Discrepancy in how long the licence is for. Application for 10 year period but application form states it would be granted for a maximum of 3 years. Need clarification if 3yrs or 10yrs.
4. No updated Environmental Statement since 2010. Lodgment is contrary to legal requirements for EIA.
5. Discrepancy in information eg Seaching of Caven.
6. Not enough information to make informed & reasoned comments.
7. Detailed design work has not appeared.
8. A detailed Construction Method Statement with application so Department & public can understand proposal and its construction and an Environmental Impact Assessment can be carried out.

9. The design for brine outfall and intake pipe as described in Construction Method Statement does not match assessment in Marine Environmental Conditions update and needs to be closely looked at and require the Applicant for further environmental information.
10. The impact of brine discharge on fish, plankton, shellfish and other habitat. The adverse impact does not seem to be considered specifically in species at Portmuck and Lobbins and will possibly be detrimental to the Tourist industry and local economy.
11. A threat to grey seals, harbour porpoise and fish.
12. That will, in turn, affect the bird population. The survey is inadequate and were not carried out at the appropriate time of year to obtain an accurate record of usings of the site by foraging seabirds. The link between ecosystem such as fish and foraging birds has not been addressed.
13. Previous surveys are out of date and should not be considered.
14. The impact of underwater noise and vibration from the formation of caverns in Lame Lough has not been assessed.
15. The brine dispersion model has not taken storm surges into account.

The application documents do not meet the requirements of the EIA Directive or Habitats Directive. The applicant should be required to submit further environmental information and a fresh application or it should preferably be refused as it is not a good thing for Islandmagee and surrounding areas.

Yours faithfully





23 March 2020

BY POST AND E-MAIL

MarineLicensingTeam@daera-ni.gov.uk

Marine Licensing Team  
Marine and Fisheries Division  
Department of Agriculture, Environment and Rural Affairs  
1st Floor Klondyke Building  
Cromac Avenue  
Belfast  
BT7 2JA

Dear Sirs

**Islandmagee Energy Limited – Marine Licence Public Consultation: ML 28\_12**

I refer to previous correspondence in relation to the Public Consultation and wish to raise the following further queries/observations:

I dispute the Applicant's determination that this project would have "minor" impact on the marine habitat. The Applicant has failed to conduct a full updated environmental assessment. As mentioned in my objection letter of 3<sup>rd</sup> February 2020, a total of only 18 hours, conducted between July and September 2019 cannot be deemed sufficient for the purposes of determining a Marine Licence. Furthermore, the Applicant's original Ornithological Survey was undertaken as per Joint Nature Conservation Committee methodology; the updated survey does not appear to have followed the same criteria. The original survey area for seabirds extended from Skernaghan Point to Portmuck and was conducted over a longer period of time. In addition, the Applicant's updated Environmental Assessment has failed to address the adverse impact the project would have on The Gobbins ASSI.

The Applicant has failed to fully assess the adverse impact caused by creation of the storage caverns in Larne Lough. I am unable to find updated assessments for this area. Both the above-ground construction works and formation of the caverns would adversely affect the marine environment yet vibration and underwater noise impacts have not been fully addressed.

The Applicant has failed to include the proposed East Coast (Northern Ireland) SPA in its updated environmental assessments. As acknowledged by DAERA: *"The proposed East Coast (Northern Ireland) Marine SPA recognises the contribution made by this wider coastal and marine area to meet the foraging requirements of breeding Terns in adjoining colonies, in the areas already designated as SPAs, for Manx Shearwater, which breed on the Copeland Islands, but use a much larger marine area around the islands for their 'rafting' requirements, and for a significant non-breeding population of Red-throated Diver on Belfast Lough together with non-breeding populations of Great Crested Grebe and Eider Duck."*

It is therefore vital to recognise that the Applicant's project would adversely affect a much larger area than just the immediate area surrounding the brine discharge site and should be addressed within their application.

Many aspects of the application require further assessment following detailed design work being carried out. I have raised this issue separately, but would reiterate that, until these unknown details are known, it is impossible for members of the public to fully assess the Applicant's proposal.

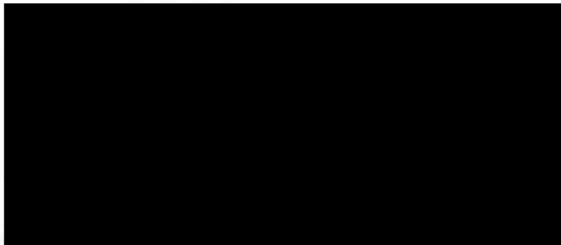
As previously mentioned, the application in its current form is disjointed, fails to clearly set out exactly what is being proposed and therefore does not comply with criteria set out by yourselves in respect of public consultations.

It is my understanding that the Applicant's submitted environmental documentation does not comply with The Habitats Directive nor The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017.

In light of the above points, and previously raised concerns, I would again submit that the Applicant's proposal should be refused. Alternatively, a completely new application should be submitted together with one full set of up-to-date environmental documentation which meets the required standards.

I await hearing from you in this matter.

Yours faithfully



Marine Licensing Team,  
Marine & Fisheries Division, DAERA,  
1st Floor Klondyke Building, Cromac Avenue, Belfast, BT7 2JA

Also by email to  
Marinelicensingteam@daera-ni.gov.uk

23rd March 2020

Islandmagee Energy / Infrastrata - Marine Licence ML28\_12

Dear Sir/Madam

This is my second extensive objection letter to this project. I wish to raise the following further points as well as those mentioned in my prior objection.

It has recently been noted that the largest habitat for the Common Lizard has now been recorded at Blackhead Point. This is not a common species regardless of it's name and the location is now under request for Protections for the habitat and the species.

This is not a huge distance away from Islandmagee, where a second smaller population has been observed on the cliffs near the Gobbins. I raise this in concern that vibration from any extraction, construction, pollution, or other works associated could adversely affect the habitat of this sensitive and delicate species and its habitat.

I also wish to remind the Department that this whole geological area is somewhat unstable. There have been minor earthquakes along the Antrim coastline in recent years. And there have been land based collapse of the roads, and the rerouting of another road because of extensive mining in the salt layer - the same salt layer this company wishes to place large gas caverns in. The land based mining is very extensive and comes at least as far as Ballycarry.

This brings me to a risk [as yet unquantified] of gas leaking into the existing land based excavations. This must be explored, and full maps of existing excavations compared with appropriate safe distances for the proposed gas caverns.

I also have concerns over the following omissions and/or vague statements and wish to bring them to your attention.

The consultation process appears to be flawed as there is insufficient and poorly stated information, so it makes it difficult to analyse and make informed and reasonable comment. However, I have done my best to find and describe my further concerns.

There are no less than SIX separate documents, containing the Environmental Information. Going through all this, I can find a non-technical summary which relates to an Environmental Statement made in 2010. Clearly this is outdated; I cannot find an updated environmental statement with an updated non-technical summary. My understanding is - this is contrary to the legal requirement for an Environmental Impact Assessment.

The phasing for the leaching of the caverns is different, therefore it does not assess or reflect what is proposed in the application documents of Environmental Information.

The explanatory note accompanying the application states that the licence will be granted for a maximum period of three years. However, the application is requesting a ten year licence period. One of these is incorrect - Perhaps the Department can clarify whether the licence is for three years or for ten years.

There are numerous references to information which will be available after a 'detailed design phase' but actual information on the detail of the design is unavailable, missing, or simply not included at all. So, it is difficult to understand what are the licensed elements of the project - there is no plan. It is impossible to regulate, inform or consider a project with such scant information.

I would like to see, visualise and know exactly where each individual cavern is to be situated. There is no map or chart.

What are the distances between them?

Are they under the sea?

Are they under land?

Are they under both?

What precautions are taken to ensure the safety of the sites, the residents business etc if some are under land?

I understand such information is a key issue and should be available under Regulation 12 [1] of the Marine Works [EIA] Regulations.

I can find no full description of the tidal impact for ongoing salt leaching. Will the salt layer lie on the ocean floor becoming evermore toxic? What are the full tidal patterns? Has all the weather condition modelling been completed for all kinds of weather events - from major storms right through to extended becalmed conditions? Without such information, the risks to the marine plants, animals and entire environment is incalculable.

I have also recently come across some information from the International Maritime Organisation. As we move towards Brexit - possibly with some delay because of the Covid-19 pandemic - fishing rights become an issue. Directly related to this is UN growing concern for toxins in the sea, particularly in heavily trafficked areas such as the English Channel, the Irish Sea. These toxins threaten all. Marine life. The increase results from tighter regulations on airborne pollution - ship owners and operators can reduce the sulphur content of ships fuel oil by [a] using quality more expensive fuel, or [b] by fitting [open-loop] scrubber systems which flush the sulphurous waste, nitrates, PAH contaminants etc into the sea. It is uncertain if the second option will be prohibited at this point in time.

It is therefore imperative this gas cavern project never proceeds, as this would add even more stress to the marine environment and to the protected species that spawn and live there.

Fishing is an important part of our local economy and is a legitimate use of the sea;

The Environmental Information presented confirms that there will be adverse impacts on a broad range of species;

Table 7-2126 of the Environmental Update Report shows "minor (adverse)" impacts from brine discharge on a broad range of species including fish, plankton, shellfish and benthic subtidal habitat with no mitigation proposed for any of these. While these impacts are considered to be minor, the fact remains that this application will have adverse impacts on a huge range of species within two designated sites.

The applicant has not included Portmuck ASSI or The Gobbins ASSI into their assessment on impacts to designated sites. Both of these sites list breeding seabirds within their qualifying features and include Razorbill, Guillemot and Kittiwake among others. Both sites are functionally linked to the proposed discharge area. The omission of any assessment of the potential impacts on the Gobbins ASSI is particularly striking given the importance of the Gobbins cliff top path. A key feature of the cliff top path is

the opportunity to see rare seabirds and other sea life. Tourism is an important and legitimate use of our sea and makes an important contribution to our local economy.

Construction of the seawater intake and brine outfall pipe has the potential to cause a temporary threshold shift and permanent threshold shift to harbour porpoise, to grey seals and to fish which can affect the swim bladder or other gas volumes in the species (this may cause behavioural effects at individual or population level);

The bird survey data presented is woefully inadequate. It is either very outdated or it fails the updated bird surveys of 2019 provided by the applicant. They are of extremely limited value in determining whether there are important bird foraging areas in the vicinity of the brine outfall. These surveys were not carried out at the appropriate time of year to obtain an accurate record of the usage of the site by foraging seabirds. They are carried out when most migrating birds had left for to Winter elsewhere.

Previous surveys carried out for this site are now out of date and cannot be considered as a basis for determining whether the proposed discharge site is of importance to foraging seabirds.

The link between vital ecosystem components such as fish and foraging birds has been omitted.

The impact of underwater noise and vibration from the formation of the caverns under Larne Lough has not been assessed. The effects of this on cetaceans, and diving birds, as well as threatened species such as the Common Skate have not been considered at all.

The brine dispersion model does not accounted for storm surges - we had a series of major storms in early 2020.

For the above reasons the application documents do not meet the requirements of the EIA Directive or the Habitats Directive.

I believe this application should be refused, or the applicant should be required to submit a fresh application.

Adding these objections to those in my prior objection, I believe this application is invalid.

I believe this application does not comply with the legal requirements of an Environmental Assessment.

Yours truly



18th March 2020

Marine Licensing Team  
Marine and Fisheries Division  
Department of Agriculture, Environment and Rural Affairs  
1<sup>st</sup> Floor Klondyke Building  
Cromac Avenue  
Belfast BT7 2JA

Dear Sir/Madam

**RE: Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining.**

Having had an opportunity to read in more detail the information accompanying the above application submitted by Infrastrata as a result of the extended public consultation period, I wish to make the following more detailed objections:

### **Environmental concerns**

1. Fishing is an important part of our local economy and is a legitimate use of the sea. As we have seen from the recent responses from the NI Marine Task Force and RSPB, the environmental information presented by Infrastrata confirms that this project will very much adversely impact a broad range of species of fish, sea creatures and birds and their breeding grounds in this designated area. This is not acceptable and the dumping of this poisonous brine does not constitute a legitimate use of the sea in my opinion.
2. The applicant has not included any consideration of Portmuck or The Gobbins as Areas of Special Scientific Interest in their assessment of impact to designated sites. This again shows how outdated the application is given how important Tourism is to our local economy and the importance of the Gobbins Cliff top path providing the opportunity to see rare birds and other sea life. Again this is a legitimate use of our sea and the Gas Caverns project is totally incompatible with this. We are so privileged here to enjoy seeing puffins and harbour porpoise in their natural habitats.
3. Seismic activity in Larne Lough has not been addressed nor has the impact of underwater noise and vibration from the drilling of the caverns. Given the history of Larne Lough and the fact that it was formed as a result of a geological fault line this is a serious omission in terms of safety of residents and property. There are no guarantees that this drilling will not produce earth tremors and destabilise the structures of our homes on the peninsula.



Infrastrata has offered no acknowledgement of or willingness to address or reassure residents regarding these very legitimate concerns.

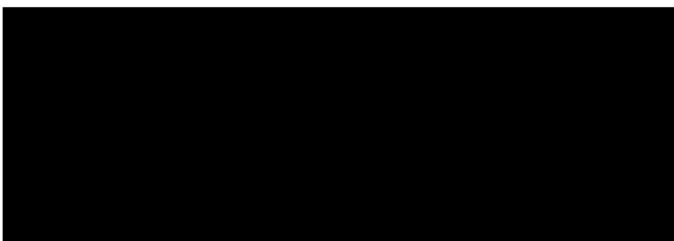
### **Procedural Issues**

1. There is no updated non-technical environmental impact summary for the public to read and easily understand. I find it hard to make sense of what they have submitted and fail to see how they can expect other residents to understand it. This is a major failing given the huge impact that this proposed project will have on the roads and marine environment in Islandmagee and on our homes.
2. Where exactly will the gas caverns be located? There are no grid references and no scale in the vague plan which is attached. It is mentioned in the application document that the caverns may be drilled under the land rather than under the Lough, where exactly will this be and how will it affect people's homes?
3. The application requests a license for a 10 year period, yet the Departmental guidance states that licences will only be granted for a maximum of three years? This inconsistency regarding length of time must be clarified by the Department.

These are just some of the reasons which stand out to me as to why this project should not be allowed to proceed in Islandmagee. There are many more technical and engineering issues. This project has nothing to offer in terms of promoting good health and wellbeing or protection of the environment; in fact totally the opposite, it can only be destructive to our beaches and marine life and for that reason should not be granted a marine license.

I trust you will take all these matters into consideration as at the public consultation sessions the representatives of the applicant showed no desire whatsoever to discuss residents' concerns. This project is outdated and unnecessary.

I would be grateful if you would acknowledge receipt of this letter.



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Marine License application 2019 Consultation ML 28\_12 Islandmagee Energy / Infrastrata  
**Date:** 07 January 2020 16:52:32

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Dear Marin Licensing Team,

I would like to raise an objection to the Marine License application 2019 Consultation ML 28\_12 Islandmagee Energy / Infrastrata.

There are many reasons to object to this but as the Larne lough has been designated a special protection areas (SPA) due to the different types of species, an area of special scientific interest and Ramsar site (wetlands of international importance designated under the Ramsar Convention) the environmental impacts of this proposed gas caverns is likely to have devastating impact on the environment and also the quality of life for those of use who live in this area.

Yours Faithfully

[REDACTED]  
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[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas Storage Project December 2019 Consultation ML 28\_12  
**Date:** 08 January 2020 15:45:23

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To whom it may concern

As a member of the public who spends much time in Islandmagee and has many family ties to the area, I am wholeheartedly against this proposed project in the area selected.

Islandmagee is a place of outstanding natural beauty that supports unique wildlife habitats. There are not enough guarantees to the safeguarding of this priceless asset to the wildlife in the area and the people who live there to allow this project to proceed any further. The risks to the local community from gas leaks need to be taken into account.

In addition to the above, the conduct of network of shell companies behind this project is equally nefarious. They are not financed well enough to guarantee project delivery as outlined in this proposal. I think we need only look at their forfeiting of payments for their recent acquisition of H&W to see how weak they are financially.

I hope that you see fit to reject any further licenses to this project and allow the tourism, wildlife and community at Islandmagee to continue to flourish as it has done for centuries.

Warm regards,

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas storage ML28\_12  
**Date:** 09 January 2020 13:01:05  
**Attachments:** [image001.png](#)

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Good afternoon,

**In confidence and without prejudice please.**

I am writing in reference to this current application and after reading the first 4 ES and EIS statements in detail along with the updated 2019 application it has become very apparent that the data supplied is well out of date. There is reference to statutory and relevant bodies engagement and consultations that took place as far back as 2007 but nothing after 2009 along with other various stakeholder and local interest groups. This is documented on pages 25 – 27 sections 3.5.1. It is not possible that the view of all these groups and bodies would have held and remained unchanged over a period of more than ten years, also we have to assume that there must have been additional groups and stakeholders that would now be relevant.

These documents very clearly state and make reference to these groups and the data collected, which is no longer relevant or up to date at all.

We cannot assume that data collated and meetings that took place over 10 years ago is still relevant and nor can we assume that the views of these groups could have changed for the positive or negative. Local MLA and MP's have changed, the current view on climate change, moving away from fossil fuels is now a huge factor in energy markets with large corporations taking a very robust commercial view that they will not be investing in fossil fuels, this was not the case 10 years ago. Where is the Cape and financial figures and commitments from the company to demonstrate that they have the backing to construct, maintain and at some stage close this site down as along with the safe operation of this facility, comes the closing and aftercare required to ensure it remains safe, there is an on-going cost associated to this, who is picking this up?, what does it look like and who is accountable the tax payer? / Govt?.....

There is a very high level view of construction traffic with little to no detail at all, they have spent no time on this.

The conclusions made on page 32 are flawed and out of date as they refer to public and stakeholder consultations that took place some 13 years ago. There is reference to meetings that took place and that these are available on their website, they are not. There is reference to “Every effort has been made using mitigation measures” which have been implemented, where are they, are they still relevant and legal, what are they?

They make reference to “Public consultation and engagement”. This has to be a mistake?... the community engagement and consultation over the past year has been nothing more than the hiring of a small hall and a few pop up panels and no agenda, nothing to talk about and very very poor. The events I attended (The notice and method to make the public aware of these was shocking) were poor, lacking any substance or detail. They were a pure box ticking exercise to say they had engaged, when in fact they disengaged. There is no minutes, there was no agenda and it was just a “Drop in and see someone” session. Amateur at best. The very locations,

notice given and timings in my view were a tactical move to ensure that attendance was not guaranteed. I know DEARA were in attendance to some of these.

Reference is made to the safety of these sites and similar sites yet they fail to mention that these types of construction are classed as “ Major Hazards” by the HSE and they also fail to mention the fatalities caused by either explosions or the leakage of Gas. Where is their robust safety documentation that is relevant and up to date?

There is a fault line that runs through Larne Loch, yet I see no reference made to that.

I still have a lot of reading to do however going by the first 4 documents that are available on the DAERA website, it is disappointing to be reading documentation and data that is over 10 years old. It is not relevant and it is not current. This construction was also removed from the PCI list as it was not deemed as “ Needed or Necessary ”. Commercially, Islandmagee Energy have not demonstrated that they can fund this, they cannot and have not demonstrated that they can sustain or make this a commercially /economically and environmentally viable. They have thrown some figures together based on 10 years of Gas prices to base their business case on, along with the assumption that the SNIP will be reversed at a cost to the Tax payer or “ Some other way of funding” . You are talking in excess of £60 Million.

There is no risk to the security of Gas supply for Northern Ireland and the UK . Currently our N-1 rating is 120% and this is from the UK National risk assessment on security of Gas supply and their view is that the UK is resilient to all but the most “ **Unlikely**” combination of circumstances and events. Their detailed analysis demonstrates that we as a nation have the ability to deliver even during the most extreme combination of failures and this report is available for all to read.

We should not be promoting fossil fuel industry and investment and we also must consider the impact on the Island if this is allowed to progress, socially and environmentally.

In summary at this stage.

- Relevant and needed Data for a view is > 10 years out of date.
- Security of supply for the UK has an N-1 rating of 120%
- Project is not needed and not necessary

Kindest Regards

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**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Objection  
**Date:** 12 January 2020 19:27:44

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I object to gas caverns on Islandmagee.

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Marine License application 2019 consultation MI 28\_12 by Islandmagee Energy/Infrastrata  
**Date:** 12 January 2020 19:44:44

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Marine License application [2019](#) consultation MI 28\_12 by Islandmagee Energy/Infrastrata.

"I object to gas caverns on Islandmagee"

[REDACTED]

[REDACTED]



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Marine License application 2019 consultation MI 28\_12 by Islandmagee Energy/Infrastrata.  
**Date:** 12 January 2020 19:46:01

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Marine License application [2019](#) consultation MI 28\_12 by Islandmagee Energy/Infrastrata.

"I object to gas caverns on Islandmagee"

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas storage ML28\_12  
**Date:** 13 January 2020 10:18:59  
**Attachments:** [image001.png](#)

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Good morning,

Further to my previous mails, please see below.

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime and alongside my previous communications I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

#### **MARINE/NATURAL WORLD**

- Discharge of up to 1000m<sup>3</sup> of hypersaline brine per hour per day (24,000m<sup>3</sup> of toxic brine per day) for 4 years into the sea, just 450m from the shore near Castle Robin at Islandmagee, creating a benthic dead zone.
- Designated Special Area of Conservation (North Channel dSAC, directly into which the hypersaline brine will be discharged, recently designated for Harbour Porpoise)
- Special Protected Areas: Proposed East Coast (NI) Marine SPA (abstract/discharge area is within the pSPA boundary)
- Larne Lough SPA (with red flagged endangered Roseate Tern a priority species)
- Areas of Specific Scientific Interest (ASSIs: The Gobbins, Muck Isle, The Maidens)
- Only Northern Ireland land based breeding puffin colony near to discharge area
- Death of sea-life and prey species (potential impact on the food chain)
- Threat to sea birds and feeding grounds
- Concerns that protected species porpoises/otters/dolphins could be displaced

#### **AFFECT ON PEOPLE**

- Potential impact on leisure pursuits fishing/diving/swimming/boating

- Potential negative impact on tourism / Gobbins Project
- Potential impact on local industry, fishermen, lobster fishermen
- Potential impact on the Mental Health and wellbeing to residents in close proximity to the site, myself and my family included.
- Potential noise impact
- Potential impact on property price and investment.

**LACK OF NEED**

- Only a "skeleton staff" required to operate facilities after construction according to the public consultation documents.
- No evidence of need for the gas storage provided in the public consultation documents
- Project removed from the PCI list as deemed " Not needed, not necessary"
- UK has an N1 Rating of 120% therefore security of supply is not at risk

**CAVERN CONCERNS**

- Serious concerns over cavern safety, now and the long term.
- Deemed a high risk project by Northern Ireland Health and Safety Executive.
- Various catastrophic disasters on projects of similar topology across the globe.

kindest Regards

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**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** RE: Concerns [UNSCANNED]  
**Date:** 14 January 2020 11:47:24  
**Attachments:** [image001.png](#)

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Thank you.

Kindest Regards

[REDACTED]

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**From:** DAERA Marine Licensing Team [mailto:[REDACTED]]  
**Sent:** 14 January 2020 10:45  
**To:** [REDACTED]  
**Cc:** DAERA Marine Licensing Team  
**Subject:** RE: Concerns

Dear [REDACTED],

Your concerns are noted and we will ensure personal details are not released in relation to the consultation.

Regards,

[REDACTED], Marine Licensing.

---

**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 14 January 2020 10:06  
**To:** DAERA Marine Licensing Team <[REDACTED]>  
**Subject:** Concerns

Good morning

In confidence and without prejudice

I must raise this as a concern. I am witnessing some abhorrent comments and harassment by Islandmagee Energy / Infrastrata shareholders towards anyone that opposes this project. They are going so far as to research and make these people's names and locations / address's public on their Share forums and social media. With this in mind, can my comments and identity please be withheld from any objections that I have made. I do not particularly want my personal details or information to be used to harass me and this does cause me some concern.

This is totally unacceptable.

kindest regards

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[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Cc:** [REDACTED]  
**Subject:** Islandmagee Energy Marine Licence Consultation ML 28 \_12  
**Date:** 14 January 2020 14:39:55

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I wish to object to the outdated and insufficiently justified proposal to create 7 underground caverns by solution mining below Larne Lough.

Am I right in understanding that the Department still has the power to order a public inquiry for the purpose of evaluating representation from the people living in NI?

I believe it is necessary to have one about Islandmagee Energy/Infrastrata application under Regulation 17 of the Water Abstraction and Impoundment(Licensing)Regulations(Northern Ireland) 2006 and in relation to the recent/current new "deal" for NI, which envisages a better protection of the environment.

Any decision made now will have strong impact on the future - hence we all, I and you, should seek ways how to be responsible ancestors wherever we live. Everything on this Earth is somehow connected.

I have been alerted to the need for greater scrutiny of Infrastrata's projects in relation to them being allowed to drill for fossil fuels within the catchment area for drinking water (that area was gradually established by Acts of Parliaments since mid 19th C - achievement by our ancestors). Infrastrata was invited/allowed to violate that catchment by the absence of understanding of the impacts.

The Marine Construction Licence, if granted, will violate environment even more, the discharge of brine in the seawater has no firm boundaries. Significant thinkers RECENTLY CALLED FOR COMPANIES TO STRONGLY JUSTIFY SUCH PROPOSALS. I - as a citizen have not seen new justification for a new gas storage anywhere in the UK.

Islandmagee Energy/Infrastrata has not made public its justification in full, beyond an assumption that getting the gas from somewhere, storing it, and piping it back to the mainland etc is a necessary and sound solution to the future energy needs of NI. I do not doubt that you are aware of the gaps in that justification. Apology for spelling it out. Hence my hope that you will address the need for a public inquiry and justification for the gas storage proposal to start with.

Moreover:

I am concerned that the company underestimates the current science and thinking in relation to the supply of energy.

I am concerned that the company simplifies/underestimates the negative impact of the seawater abstraction and salt removal, and brine discharged, on disturbing the sea life.

I do not doubt that you do not support creation of so called "benthic dead zone". of the hypersaline brine being discharged into North Cannel dSAC, of polluting ASSIs, of failure to protect Roseate Turn, breeding puffin colony, feeding ground for porpoises, otters, dolphins, birds, and of course people who eat fish. The company cannot stop pollution affecting negatively fishing, swimming, inter alia. If I am right, then you cannot grant the MC Licence.



Call me naïve - but I cannot understand why it is economically viable to do all that damage in order to pipe gas from east to the west, store it in the caverns, and then out back to the east (as well as somewhere on the island of Ireland...on this the company is not specific). As for taking out the salt - I hope that your awareness of collapsed mines above Carrickfergus will offer some serious examination of the proposal that plans to remove vast amount of salt to create caverns - so near the geological fault.

I came across a note that Northern Ireland Health and Safety Executive perceives Infrastrata's project as a "high risks". This is significant - the old philosophical adage if in doubt, do not do it, comes as support for their view. Maybe their points ought to be made public?

I would like to know also how this project is needed to secure the future of supply of energy when it is in conflict with the government's new priorities to engage renewables. This alone makes the project not viable, not justified, not needed.

I understand that the original plan so many years ago was not scrutinised from the knowledge that is available now. This must be, nevertheless, done now. To grant the Marine Construction Licence while having current understanding of the issues involved is not justified.

Please, be courageous and think of the future generations, of their need for clean Land, Air and Water.

Sincerely,

A large black rectangular redaction box covering the signature area.

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas storage ML28\_12  
**Date:** 16 January 2020 11:21:06  
**Attachments:** [image001.png](#)

---

Good morning.

**In confidence and without prejudice please.**

In relation to and in addition to my previous communications / objections.

In relation to the current ML application and to make reference to the out of date documentation on the application regarding stakeholder management / meetings. The current list of MLA'S that have signed up to and support the " MLA charter to protect and restore nature" has not been taken into account ( As the data is >10 years old ). To make reference to this charter and they pledge to work on the following

- Establish an independent environmental watchdog on a par with other parts of these islands. To uphold the law and give the citizens a voice.
- Enshrine in NI law, key environmental principals such as the precautionary principle, the polluter pays principle as the principle that environmental damage should be rectified at source.
- Put in place new legislation to halt and reverse biodiversity loss on land and sea and to tackle climate change.
- A sustainable land use policy that protects and restores the environment.
- Develop future fisheries policies which sustain both the marine environment and fisheries by keeping the health of the sea at the heart of decision making.
- Work closely with other governments to address shared environmental issues and challenges.

Currently, there is a list of 53 Signatories ( List below ) who have signed this pledge to "Ensure the recovery of nature in Northern Ireland, protecting the environment for future generations and creating a home where everyone can thrive" and I am sure this will grow over time. In the absence of any new laws / legislation / that we know and are aware will be forthcoming and that this has not been a consideration in the application of the ML application it would be premature and inappropriate to award a ML based on data and assumptions that are seriously out of date in the current applications, not just politically but also environmentally and legally.

Until our legislation and law is in a position to fully understand the impact that awarding this ML will have on the Environment and people / land and how it aligns to the charter / Law and also that current, live and relevant key stakeholders are engaged and informed, an informed and balanced decision cannot be made or even considered.

The list is as follows –

- Jemma Dolan – Sinn Fein Fermanagh and South Tyrone.
- Mike Nesbitt – UUP Strangford.

- Sinead Bradley – SDLP South Down
- John Blair – Alliance South Antrim
- Rachel Woods – Green Party North Down
- Kellie Armstrong – Alliance Strangford
- Gary Middleton – Dup Foyle
- Michelle O’Neill – Sinn Fein Mid Ulster
- Maolioisa McHugh – Sinn Fein West Tyrone
- Arlene Foster – DUP Fermanagh and South Tyrone
- Nicola Mallon – SDLP North Belfast
- Gerry Carroll – People Before Profit West Belfast
- Colum Eastwood – SDLP Foyle
- Karen Mullen – Sinn Fein Foyle
- Paul Frew – DUP North Antrim
- Megan Fearon – Sinn Fein Newry and Armagh
- Emma Sheerin – Sinn Fein Mid Ulster
- Gordon Dunne – DUP North Down
- Phillip McGuigan – Sinn Fein North Antrim
- Maire Hendron – Alliance East Belfast
- Clare Bailey – Green Party South Belfast
- Alex Easton – DUP North Down
- Robbie Butler – UUP Lagan Valley
- Declan McAleer – Sinn Fein West Tyrone
- Caoimhe Archibald – Sin Fein East Derry / Londonderry
- Steve Aiken - UUP South Antrim
- Colm Gildernew – Sinn Fein Fermanagh and South Tyrone
- Mervyn Storey – DUP North Antrim
- Chris Lyttle – Alliance East Belfast
- Catherine Kelly – Sin Fein West Tyrone
- Colin McGrath – SDLP South Down
- Stewart Dickson – Alliance East Antrim
- Mark H Durkan – SDLP Foyle
- Jonathan Buckley – DUP Upper Bann
- Sinead Ennis - Sinn Fein South Down
- Pat Catney – SDLP Lagan Valley
- Clarie Sugden – Independent East Derry / LondonDerry
- Pat Sheehan – Sinn Fein West Belfast
- Stephan Farry – Alliance North Down
- Carai Ni Chullin – Sinn Fein North Belfast
- Conor Murphy – Sinn Fein Newry and Armagh
- Trevor Lunn – Alliance Lagan Valley
- Linda Dillon – Sinn Fein Mid Ulster
- Justin McNulty – SDLP Newry and Armagh
- John O’Dowd – Sinn Fein Upper Bann
- Paula Bradshaw – Alliance South Belfast
- David Hilditch – DUP East Antrim
- Sean Lynch – Sinn Fein Fermanagh and South Tyrone

- Jim Wells – DUP South Down
- Cathal Boylan – Sinn Fein Newry and Armagh
- Michelle McLlveen – DUP Strangford
- Paula Bradley – DUP North Belfast
- Declan Kearney – Sinn Fein South Antrim

Again , thank you for your time and please ensure that my personal details are not shared.

kindest regards

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**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas storage ML28\_12  
**Date:** 23 January 2020 15:10:32  
**Attachments:** [image001.png](#)

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Good afternoon,

In confidence and without prejudice.

Further to and in addition to my previous objections. I can find no published data in respect of the permitted levels of brine discharge specific to an SAC designated for Harbour Porpoise along with sound pollution data and what impact this would have over the life of the brine pollution discharge which is a number of years. I did read in the documentation that there is an "Assumption" that wildlife would just "Avoid" the area however I see no evidence or data, nor through research can I locate any data to suggest that this would indeed be the case, not just for the porpoise but also for any dependencies which they would rely on for prey etc which tells me either that this study has not been performed or I cannot find it.

One has to assume that for Infrastrata to claim that they are within the limits in respect to its consent to discharge application that they have based their data against data that is available and current therefore these guidelines must exist somewhere?

Would you be so kind as to support me at all in pointing me to the location of this data or where I am best placed to enquire / research?

With regards to noise, in reference to citation from Michal Stoker ( 2016 ) published by The Acoustic society is that we are introducing noise to the sea and oceans that is new to Marine Habitats and I quote " Longer term and more detailed studies are required to understand the impact to the entire Marine environment " I am finding it a challenge to locate any data of significant value or relevance, not even in the ML application and I can certainly find no specifics with regards to the Porpoise or an SAC with regards to Brine or noise and this is even with reaching out to associates of mine that are Marine Biologists, both here and abroad.

Thank you in advance for your time.

kindest Regards

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**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee gas storage  
**Date:** 23 January 2020 20:37:21

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Marine Licensing

**RE: InfraStrata Gas Storage Project**

As I had some reservations about this project on environmental grounds I attended the public information evening hosted by yourselves in Islandmagee (23/1/20).

The event was very useful helping me to come to a decision on the planned work. My reservations addressed I now consider this project will be beneficial to not only the local Antrim area but to the wider Northern Ireland economy and indeed the island of Ireland.

I'd like to extend my thanks to the DEARA representatives present at the event, the amount of research and work they have invested in this assessment was evident. I look forward to the outcome of the consultation.

Regards

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Energy Limited Application for Marine Licence - Objection  
**Date:** 24 January 2020 15:09:46  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Dear Sir

We refer to the consultation exercise on your website <https://www.daera-ni.gov.uk/consultations/islandmagee-gas-storage-project-december-2019-consultation-ml-2812> in respect of a proposed marine licence for a gas storage project at Islandmagee advertised in the Belfast Telegraph on 20th December 2019. We are instructed to make this representation on behalf of our client, a resident of Islandmagee.

Your website contains links to a number of pieces of environmental information and seeks the public's views on the application and the environmental information. It is not clear, however, whether the consultation is being carried out solely under part 4 of the Marine and Coastal Access Act 2009 or whether this consultation exercise is also a consultation under The Marine Works (Environmental Impact Assessment) Regulations 2007 as amended ("The Marine EIA Regulations") or under the Habitats Regulations or some combination of these statutory processes. The advertisement of 20 December 2019 simply refers to the Marine and Coastal Access Act 2009.

It is our client's position that there are a number of serious procedural errors with the current consultation process which render it unlawful, ultra vires and irrational. Any decision made by the Department on foot of this consultation exercise will be susceptible to Judicial Review.

### **Invalid Application**

The Department has acted unlawfully and irrationally in accepting updates to a Marine Licence Application rather than requiring that a fresh Marine Licence Application be submitted.

A Marine Licence Application was submitted on or around October 2012. Between 2014 and 2018 the application lay dormant. Since the date of the 2012 application there have been a number of significant changes including inter alia:

- legislative changes to the Marine EIA regime;
- substantial changes to the EIA Directive;
- a significant number of new environmental designations within the vicinity of the project;
- additional consented developments;
- changes in habitats;
- changes in the location and number of important ecological species;
- changes in technology; and
- changes in standards by which environmental effects are assessed.

The Marine Works (Environmental Impact Assessment) Regulations 2007 as amended, grants the power under Regulations 16(4) and 17(4) to treat an application as being withdrawn if an applicant has failed to comply with a direction to provide information. The Department has acted unlawfully and irrationally in failing to treat the 2012 application as withdrawn.

Our client had a legitimate expectation that in light of the lapse of time and the significant legislative and environmental changes which have taken place since 2012 that a new marine licence application would be required.

No reasons have been given or made public as to why the Department believes that the revised application is valid and no reasons have been given as to why the Department has failed to exercise its powers under Regulation 16(4) and 17(4) referred to above.

We have obtained, under Environmental Information Regulations a series of emails and other correspondence between the Department and the Applicant dated between March 2019 and May 2019, in which the Department requests that the Applicant submit a fresh application, and in particular refers to the powers set out under Regulations 16(4) and 17(4). These documents are not referred to by the Applicant in its application documentation. It is not clear why the Department appears to have reversed its position.

For the above reasons the present application is invalid. The Department must treat the application as having been withdrawn and request that a fresh application be submitted. The failure to require a fresh application infects the decision making process and assessment of environmental effects.

### **EIA Regime**

We have obtained a number of documents under the Environmental Information Regulations which show that the Department has erred in law in determining which EIA Regime is applicable in this instance.



The Marine Licence Application was submitted in 2012, notwithstanding our concerns regarding the validity of that application, the application has not yet been determined and therefore any environmental assessment must be carried out in accordance with the Environmental Impact Assessment regime (and associated case law) applicable up until the date of determination.

The Marine Environment Conditions Update Report, at page 24 sets out a summary of the consultation with statutory bodies. Correspondence although referred to, and summarised, has not been provided. A letter of 20 August 2018 from DAERA to IMEL is referred to. The summary states that “DAERA requested an update of the dispersion modelling and confirmed that the 2011 EIA Regulations are applicable to this project”.

We have obtained, through an Environmental Information Regulations Request, a copy of the letter of 20 August 2018. That letter states:

“During the meeting of 30 July 2018, we highlighted that Environment Impact Assessment (EIA) Regulations have been amended since submission of your original EIA documents. The Department agreed that it would investigate as to whether the previous EIA Regulations of 2011 would still apply, or if the amended EIA Regulations of 2017 would be applicable. We have investigated this issue and are content that EIA Regulations 2011 should be applied.”

It is assumed that “the EIA Regulations 2011” is a reference to The Marine Works (Environmental Impact Assessment) (Amendment) Regulations 2011 which introduced amendments to the Marine Works (Environmental Impact Assessment) Regulations 2007. No reasons or rationale has been provided for this decision and this decision is not in the public domain. This decision is however, unlawful, irrational and ultra vires. The application must be determined in accordance with the Marine Works (Environmental Impact Assessment) Regulations 2007 as amended in 2011 and 2017.

The Department can only lawfully determine the application in accordance with The Marine Works (Environmental Impact Assessment) (Amendment) Regulations 2017. These regulations came into force on 16th May 2017. There is no statutory provision or mechanism to apply any other previous iteration of the Regulations to any outstanding application yet to be determined.

The Applicant has not referred to an email of 27 March 2019 where the Department appears to have changed its mind and stated that the application should be determined under the 2017 Regulations, that email states:

*“Although I am recommending a new application, this does not mean a restart of the process. The early stages of the Environmental Impact Assessment process (screening and scoping) were carried out under the 2011 Regulations, and these are still valid because you have now given information to confirm that the application has not substantially changed. However, given the time delay between the scoping and the production of the final Environmental Statement, that will include “further information” under the terms of the Regulations, it is appropriate at this stage is considered under the 2017 amended regulations. Although this is a change in view from our letter of August 2018, I think there advantages to the company....”*

It is notable that this latest correspondence is not referred to by the Applicant and therefore, members of the public could be misled into believing that the application is to be determined in accordance with the 2011 Regulations and not the 2017 Regulations which impose additional obligations on the Department when carrying out an Environmental Impact Assessment.

It is not clear from the application documentation; the Department’s website, statutory advertisement or any other public document whether the Department intends to determine the application in accordance with The Marine Works (Environmental Impact Assessment) (Amendment) Regulations 2017 or some other version of the Marine Works (Environmental Impact Assessment) Regulations.

The Department must publicly confirm that it intends to determine the application in accordance with the 2017 Regulations.

### **Failure to require a fresh, composite Environmental Statement**

The Department has acted unlawfully, irrationally and ultra vires in failing to comply with the requirements of The Marine Works (Environmental Impact Assessment) Regulations as amended.

The Applicant has made an application for Marine Licence under the Marine and Coastal Access Act 2009. This is a regulated activity as defined by the Marine EIA Regulations. The proposed project is likely to have a significant impact on the environment by virtue of its size and scale and the proximity of a number of European designated sites. The proposed development is a schedule 1 development that requires an EIA.

It is not clear why the Department has not required the Applicant to submit a fresh, composite Environmental Impact Statement.

It is accepted that the Department has the power under Regulation 10(1)b of the Marine EIA Regulations, to not require an environmental impact assessment where such an assessment has already been carried out by another consenting authority and such assessment will be sufficient to meet the requirements of the EIA Directive in relation to

that project. The discretion is strictly limited.

#### **Failure to comply with Regulation 10(4B)**

Regulation 10(4B) requires that the “Regulator must be satisfied that the information incorporated in the other consenting authority’s assessment and consent (if any) is up to date at the time that the regulatory decision is taken”.

The Department, as Regulator, is not satisfied that the information incorporated in the other consenting authority’s assessment and consent is up to date. The Department has expressly requested that further environmental information be produced.

The Marine Environmental Conditions Update document submitted by the Applicant lists at Section 4.2 entitled “Scoping”, that:

“DAERA identified that some of the marine data used to inform the Environmental Statement in 2012 may now be considered out-dated and therefore should be supplemented with more recent information and the environmental assessments undertaken updated if necessary based on this updated baseline information before the marine licence can be finalised”

The document goes on to list an extensive list of important environmental matters which must be updated.

It is clear that DAERA do not consider the environmental assessment of 2012 to be up to date and therefore cannot rely on Regulation 10(1b) to dispense with the need for a fresh Environmental Impact Assessment.

#### **Failure to meet the requirements of Regulation 10(4C)**

Regulation 10(4C) states that:

“The regulatory decision must be taken within a period of time which –

- a) is reasonable taking into account the nature and complexity of the regulated activity; and
- b) begins with the date on which the other consenting authority’s decision is published”

Planning consent was granted in October 2012 and this is the relevant date for considering whether or not the marine licence can be granted or considered in reliance of the planning assessment of environmental effects. Some seven and a half years have elapsed since the planning authority granted planning permission and concluded its assessment of environmental effects. This cannot be considered a reasonable period of time and therefore, the Applicant must be asked to submit a fresh comprehensive environmental statement.

The decision to ask the Applicant to simply submit a very limited Marine Environmental Conditions Update and to rely upon an assessment of environmental effects which is 7 years old is unlawful, irrational and ultra vires in that it contravenes the Marine Works (Environmental Impact Assessment) (Amendment) Regulations 2017.

#### **Failure to meet the requirements of the EIA Directive**

Regulation 10(1b) of the Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) can only be relied upon where the environmental impact assessment relied upon meets the requirements of Directive 2011/92/EU as amended by directive 2014/52/EU (the EIA Directive). The environmental impact assessment carried out to date does not meet the requirements of the EIA Directive.

#### **Failure to meet the requirements of the EIA Directive: Project Description**

The EIA Directive requires that full description of the operational phase of a development be set out and assessed.

In particular Annex III of the 2014/52/EU requires that the following information be included :

“Characteristics of projects

The characteristics of projects must be considered, with particular regard to:

- (a) the size and design of the whole project;
- (b) the cumulation with other existing and/or approved projects;
- (c) the use of natural resources, in particular land, soil, water and biodiversity;
- (d) the production of waste;
- (e) pollution and nuisances;
- (f) the risk of major accidents having regard in particular to substances or technologies used and/ or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge;
- (g) the risks to human health (for example due to water contamination or air pollution).”

The EU has published guidance: Impact Assessment of Projects Guidance on the preparation of the Environmental Impact Assessment Report (Directive 2011/92/EU as amended by 2014/52/EU) (hereafter referred to as EU EIA

Guidance). That document states:

*“A description of the Project: this is an introduction to the Project, and includes a description of the location of the Project, the characteristics of the construction, and the operational phases of the Project, as well as estimates of the expected residues, emissions, and waste produced during the construction and operation phases (Article 5(1)(a) and Annex IV point 1)”*

Part C of the EU EIA Guidance provides a checklist for various sections of an Environmental Statement, including a checklist for the description of the project. A brief review of this checklist highlights the following matters:

1. The expected start and finish dates for operation have not been described;
2. The expected start and finish dates for decommissioning have not been described;
3. The Environmental Statement, addendum and Marine Environmental Conditions Update do not provide or incorporate copies of the consented planning permission drawings and therefore there is not a description of the layout of the site and of the project's main characteristics;
4. The activities associated with the decommissioning of the project have not been described or assessed. The Environmental Statement of 2010 states: “The pipelines will be decommissioned when they reach the end of their useful life, in accordance with legislation at the time of de-commissioning. At that time detailed decommissioning procedures will be produced.” The requirements for decommissioning and their potential environmental effects are relevant material considerations which must be considered by the Department. Therefore the environmental impact assessment must include a description and assessment of the decommissioning of the entire scheme or project.
5. The location and final disposal of all solid wastes have not been discussed and assessed, in particular the air quality impacts of transporting waste to England for disposal;
6. Wastes associated with decommissioning have not been identified and assessed and consideration has not been given to the toxicity of such wastes;
7. The transportation of resources has not been described or considered during operation and during decommissioning;
8. Efficiency and sustainability in the use of resources has not been adequately described or considered;
9. The types and quantities of energy needed for construction and operation have not been described.

This is not an exhaustive list of the deficiencies in the project description but highlights that a single composite environmental statement meeting the requirements of the revised EU EIA Directive is required.

#### **Failure to meet the requirements of the EIA Directive: Climate Change**

Annex IV to the EIA Directive includes direct reference to climate and climate change in two provisions. The emphasis is placed on two distinct aspects of the climate change issue:

- Climate change mitigation: this considers the impact the Project will have on climate change, through greenhouse gas emissions primarily;
- Climate change adaptation: this considers the vulnerability of the Project to future changes in the climate, and its capacity to adapt to the impacts of climate change, which may be uncertain.

Climate change has not been addressed at all in the environmental information.

#### **Failure to meet the requirements of the EIA Directive: Accidents and Disaster Risks**

Annex IV contains direct reference to accidents and disaster risks in two provisions. The Directive uses the terms ‘major’ accidents and ‘disasters’, which are tied to the notion of significant effects the focus of these provisions is on significant risk and/or a risk that could cause significant environmental effects.

Two key considerations emerge therefrom, namely:

- The Project's potential to cause accidents and/or disasters In this case, the Directive explicitly refers to considerations for human health, cultural heritage, and the environment.
- The vulnerability of the Project to potential disaster/accident

In this case, the requirement covers both natural (e.g. landslide) and man-made disasters (e.g. technological hazards) that could significantly impede the Project's activities and objectives and which might have adverse effects.

The EU EIA Guidance recommends that EIA should address issues such as:

- What can go wrong with a Project?
- What adverse consequences might occur to human health and to the environment?
- What is the range of magnitude of adverse consequences?
- How likely are these consequences?
- What is the Project's state of preparedness in case of an accident/disaster?
- Is there a plan for an emergency situation?

The environmental statement from 2010 simply states that a gas explosion is “highly improbable” – without presenting any evidence for this statement. The present environmental information does not meet the detailed requirements of Annex IV in so far as it relates the assessment of potential accidents and disasters.

### **Failure to meet the requirements of the EIA Directive: Paper Chase**

Berkeley v SSETR [2000] 3 WLR 420 , the House of Lords commented that an Environmental Statement must not be a "paper chase". Lord Hoffman said, "the point about the environmental statement contemplated by the Directive is that it constitutes a single and accessible compilation, produced by the applicant at the very start of the application process, of the relevant environmental information and the summary in non-technical language."

The environmental information provided is spread over a number of documents, not all of which are publicly available. The reader is required to read across an environmental statement, which is ten years old, an addendum to that document and the planning documentation which is accessible from the "EPIC" website, and compare those complex documents to the Marine Environmental Conditions Update document and Habitats Regulations Assessment. This is a paper chase. As such the Environmental Impact Assessment documents do not comply with the EIA Directive.

### **Failure to meet the requirements of the EIA Directive: Screening and Scoping**

The screening and scoping opinions carried out in 2012 are not available on the DAERA consultation page website.

Regulation 16(2A) of the Marine EIA Regulations as amended and Schedule 4 requires that scoping opinions must be made public, be electronically available and publicised. There are numerous references to the Scoping opinion issued by the Department in the Environmental Conditions Update document, yet this Scoping opinion has not been made available on the consultation website.

In failing to make this information publicly available on the consultation website, the Department has acted unlawfully and failed to comply with the requirements of the EIA Directive.

### **Advertisement**

The advertisement placed in the Belfast Telegraph dated 20 December 2019 does not meet the statutory requirements of the Habitats Directive or the EIA Directive. Furthermore, it is not possible to ascertain from the advertisement the precise location of the proposed works.

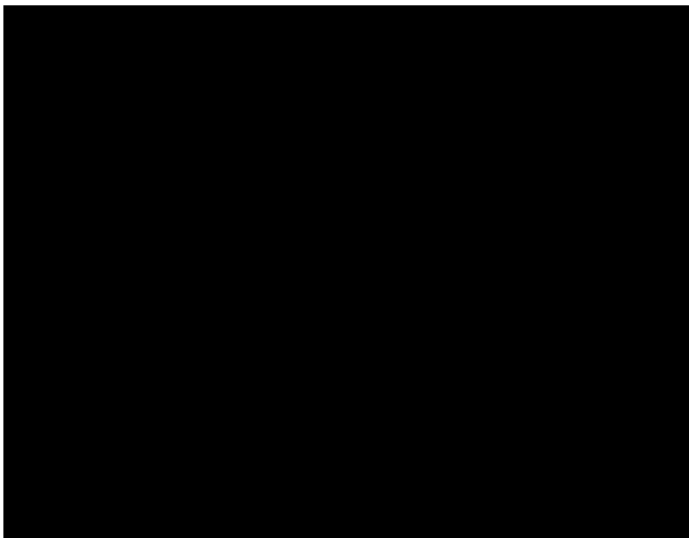
### **Third Party Audit of Brine Modelling**

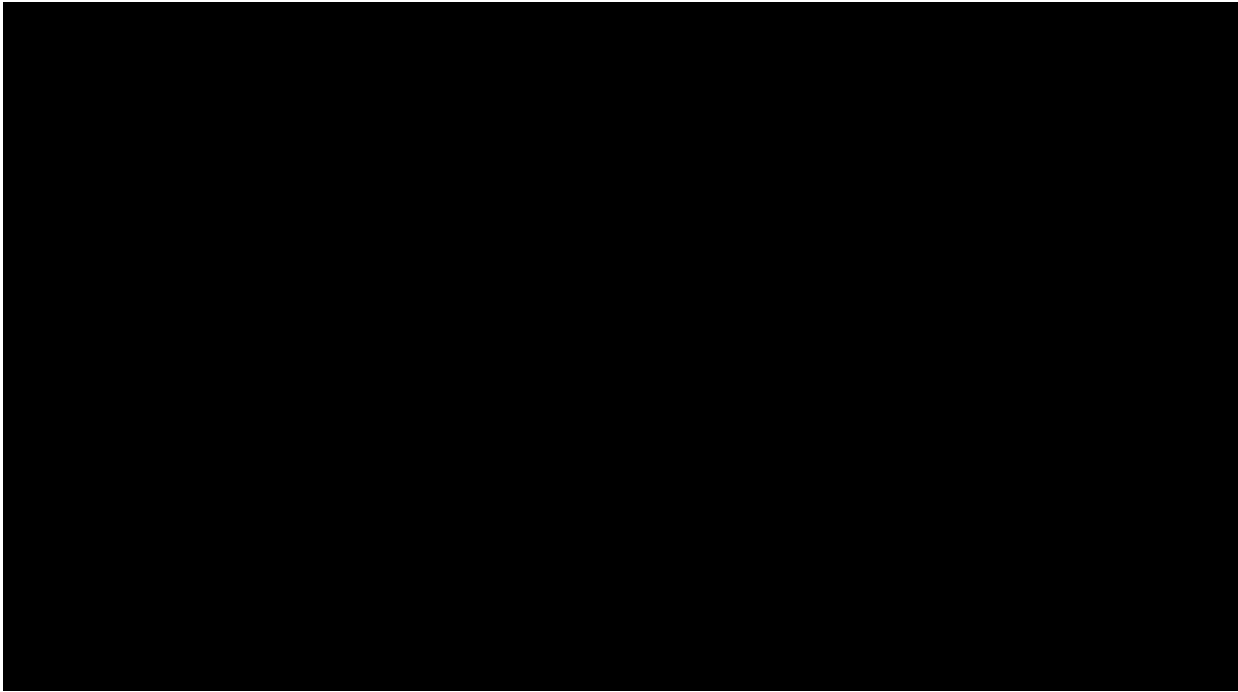
We have obtained copies of minutes of a meeting of 14 March 2019 between the Department, NIEA, Infrastrata, Islandmagee Energy, Costain and RPS to discuss the application. It is noted that a request for a 3rd Party audit of the Brine Dispersal Modelling be carried out. We cannot see any reference to such a review in the Marine Environmental Conditions Update. This is environmental information which would be relevant to the Department's decision and should be made publicly available for review and comment.

### **Conclusion**

The consultation process is fundamentally flawed and the Department will be acting unlawfully, irrationally and ultra vires for the reasons set out above. We are instructed to issue proceedings if the Department does not withdraw the consultation process, require the applicant to submit a fresh application accompanied by a composite environmental statement which complies with the EIA Directive.

Yours faithfully





**From:** [REDACTED]  
**To:** [DAFRA Marine Licensing Team](#)  
**Subject:** Gas caverns  
**Date:** 27 January 2020 18:19:23

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## **Re: Islandmagee Gas Storage Project Consultation ML 28\_12**

Please accept this letter as my objection to the above proposal.

I am concerned about so many aspects of this unnecessary project but here are a few:

1. What would happen if there were to be an explosion, above or underground, in Larne lough? It is not beyond possibility.
2. What is the risk assessment in relation to leaks that could pollute the environment further?
3. I do not believe that marine displacement in this area of many protected species should be considered acceptable, and have read the report issued by Infrastrata's business partner (monies are owed to RPS from many years back now including the costs on the recent survey, so it is in their interest to provide the best view of the damage as they can). Can a marine life survey not be provided by an independent company?

I am very worried about this, please do not let it happen.,

Regards [REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee  
**Date:** 28 January 2020 08:55:57

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Good morning, i would just like to state that I, as an Islandmagee resident all my life would like to put forward my support for the infrastrata project. While I would not wish any harm to come to the environment because of this project, I believe it would not be of a long lasting nature and would benefit the area in the long run. Thank you for your time and consideration.



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** RE: HPRM: Islandmagee Gas storage ML28\_12  
**Date:** 28 January 2020 10:40:18  
**Attachments:** [image001.png](#)

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Apologies, In case it is required, I do object to ML being awarded as the current application does not capture the below, nor has it been a consideration in the application or factored in to the submission.

Kindest Regards

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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**From:** DAERA Marine Licensing Team [mailto:[REDACTED]]  
**Sent:** 22 January 2020 17:46  
**To:** [REDACTED]  
**Cc:** DAERA Marine Licensing Team  
**Subject:** RE: HPRM: Islandmagee Gas storage ML28\_12  
Thank you for your response to the consultation.  
Marine Licensing Team

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**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 16 January 2020 11:21  
**To:** DAERA Marine Licensing Team  
**Subject:** HPRM: Islandmagee Gas storage ML28\_12

Good morning.

**In confidence and without prejudice please.**

In relation to and in addition to my previous communications / objections.

In relation to the current ML application and to make reference to the out of date documentation on the application regarding stakeholder management / meetings. The current list of MLA'S that have signed up to and support the " MLA charter to protect and restore nature" has not been taken into account ( As the data is >10 years old ). To make reference to this charter and they pledge to work on the following

- Establish and independent environmental watchdog on a par with other parts of these islands. To uphold the law and give the citizens a voice.
- Enshrine in NI law, key environmental principals such as the precautionary principle, the polluter pays principle as the principle that environmental damage should be rectified at source.
- Put in place new legislation to halt and reverse biodiversity loss on land and sea and to tackle climate change.
- A sustainable land use policy that protects and restores the environment.
- Develop future fisheries policies which sustain both the marine environment and fisheries by keeping the health of the sea at the heart of decision making.
- Work closely with other governments to address shared environmental issues and



challenges.

Currently, there is a list of 53 Signatories ( List below ) who have signed this pledge to “ Ensure the recovery of nature in Northern Ireland, protecting the environment for future generations and creating a home where everyone can thrive” and I am sure this will grow over time. In the absence of any new laws / legislation / that we know and are aware will be forthcoming and that this has not been a consideration in the application of the ML application it would be premature and inappropriate to award a ML based on data and assumptions that are seriously out of date in the current applications, not just politically but also environmentally and legally.

Until our legislation and law is in a position to fully understand the impact that awarding this ML will have on the Environment and people / land and how it aligns to the charter / Law and also that current, live and relevant key stakeholders are engaged and informed, an informed and balanced decision cannot be made or even considered.

The list is as follows –

- Jemma Dolan – Sinn Fein Fermanagh and South Tyrone.
- Mike Nesbitt – UUP Strangford.
- Sinead Bradley – SDLP South Down
- John Blair – Alliance South Antrim
- Rachel Woods – Green Party North Down
- Kellie Armstrong – Alliance Strangford
- Gary Middleton – Dup Foyle
- Michelle O’Neill – Sinn Fein Mid Ulster
- Maolioisa McHugh – Sinn Fein West Tyrone
- Arlene Foster – DUP Fermanagh and South Tyrone
- Nicola Mallon – SDLP North Belfast
- Gerry Carroll – People Before Profit West Belfast
- Colum Eastwood – SDLP Foyle
- Karen Mullen – Sinn Fein Foyle
- Paul Frew – DUP North Antrim
- Megan Fearon – Sinn Fein Newry and Armagh
- Emma Sheerin – Sinn Fein Mid Ulster
- Gordon Dunne – DUP North Down
- Phillip McGuigan – Sinn Fein North Antrim
- Maire Hendron – Alliance East Belfast
- Clare Bailey – Green Party South Belfast
- Alex Easton – DUP North Down
- Robbie Butler – UUP Lagan Valley
- Declan McAleer – Sinn Fein West Tyrone
- Caoimhe Archibald – Sin Fein East Derry / Londonderry
- Steve Aiken - UUP South Antrim
- Colm Gildernew – Sinn Fein Fermanagh and South Tyrone
- Mervyn Storey – DUP North Antrim
- Chris Lyttle – Alliance East Belfast
- Catherine Kelly – Sin Fein West Tyrone
- Colin McGrath – SDLP South Down
- Stewart Dickson – Alliance East Antrim
- Mark H Durkan – SDLP Foyle
- Jonathan Buckley – DUP Upper Bann

- Sinead Ennis - Sinn Fein South Down
- Pat Catney – SDLP Lagan Valley
- Clarie Sugden – Independent East Derry / LondonDerry
- Pat Sheehan – Sinn Fein West Belfast
- Stephan Farry – Alliance North Down
- Carai Ni Chullin – Sinn Fein North Belfast
- Conor Murphy – Sinn Fein Newry and Armagh
- Trevor Lunn – Alliance Lagan Valley
- Linda Dillon – Sinn Fein Mid Ulster
- Justin McNulty – SDLP Newry and Armagh
- John O’Dowd – Sinn Fein Upper Bann
- Paula Bradshaw – Alliance South Belfast
- David Hilditch – DUP East Antrim
- Sean Lynch – Sinn Fein Fermanagh and South Tyrone
- Jim Wells – DUP South Down
- Cathal Boylan – Sinn Fein Newry and Armagh
- Michelle McLlveen – DUP Strangford
- Paula Bradley – DUP North Belfast
- Declan Kearney – Sinn Fein South Antrim

Again , thank you for your time and please ensure that my personal details are not shared.

kindest Regards

[Redacted signature block]

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[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** RE: HPRM: Islandmagee Gas storage ML28\_12  
**Date:** 28 January 2020 11:01:10  
**Attachments:** [image001.png](#)

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Thank you,  
Apologies. I was unsure if I had to make it clear these are objections and not queries.  
Thank you.  
Kindest Regards

[REDACTED]  
[REDACTED]  
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[REDACTED]  
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**From:** DAERA Marine Licensing Team [mailto:[REDACTED]]  
**Sent:** 28 January 2020 10:59  
**To:** [REDACTED]  
**Subject:** RE: HPRM: Islandmagee Gas storage ML28\_12

[REDACTED],  
Thank you for latest response to the consultation. Please only respond further if you have addition information to add to your existing submissions.  
Marine Licensing Team

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**From:** [REDACTED]  
**Sent:** 28 January 2020 10:37  
**To:** DAERA Marine Licensing Team  
**Subject:** RE: HPRM: Islandmagee Gas storage ML28\_12

Apologies, I neglected to add.  
In the absence of any credible proven scientific and long term data data to form a comparison to the below ( Long term new noise / Impact on SAC / porpoise and Marine Environment ), I object to the ML being awarded on that basis also as the ML application does not capture that, it captures assumptions therefore the precautionary measure / rule must apply.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** 27 January 2020 15:14  
**To:** 'DAERA Marine Licensing Team'  
**Subject:** RE: HPRM: Islandmagee Gas storage ML28\_12

Thank you.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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**From:** DAERA Marine Licensing Team [[mailto:\[REDACTED\]](mailto:[REDACTED])]

**Sent:** 27 January 2020 15:07

**To:** [REDACTED]

**Subject:** RE: HPRM: Islandmagee Gas storage ML28\_12

Thank you for your email, I will redirect your query and you should receive an answer in due course.

Marine Licencing Team

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**From:** [REDACTED] [[mailto:\[REDACTED\]](mailto:[REDACTED])]

**Sent:** 23 January 2020 15:10

**To:** DAERA Marine Licensing Team <[REDACTED]>

**Subject:** HPRM: Islandmagee Gas storage ML28\_12

Good afternoon,

In confidence and without prejudice.

Further to and in addition to my previous objections. I can find no published data in respect of the permitted levels of brine discharge specific to an SAC designated for Harbour Porpoise along with sound pollution data and what impact this would have over the life of the brine pollution discharge which is a number of years. I did read in the documentation that there is an "Assumption" that wildlife would just "Avoid" the area however I see no evidence or data, nor through research can I locate any data to suggest that this would indeed be the case, not just for the porpoise but also for any dependencies which they would rely on for prey etc which tells me either that this study has not been performed or I cannot find it.

One has to assume that for Infrastrata to claim that they are within the limits in respect to its consent to discharge application that they have based their data against data that is available and current therefore these guidelines must exist somewhere?

Would you be so kind as to support me at all in pointing me to the location of this data or where I am best placed to enquire / research?

With regards to noise, in reference to citation from Michal Stoker ( 2016 ) published by The Acoustic society is that we are introducing noise to the sea and oceans that is new to Marine Habitats and I quote " Longer term and more detailed studies are required to understand the impact to the entire Marine environment " I am finding it a challenge to locate any data of significant value or relevance, not even in the ML application and I can certainly find no specifics with regards to the Porpoise or an SAC with regards to Brine or noise and this is even with reaching out to associates of mine that are Marine Biologists, both here and abroad.

Thank you in advance for your time.

kindest Regards

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[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** HPRM: Islandmagee Gas storage ML28\_12  
**Date:** 31 January 2020 16:29:27  
**Attachments:** [image001.png](#)

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Good afternoon.

In confidence and without prejudice.

After tirelessly reading the various documents on the portal and going over them more than once, I had to ask myself why I had to constantly go through them and it became very clear that it is utterly confusing for various reasons. Out of date documentation was a huge factor as I had to perform mountains of research only to discover huge sections are not current and if this is part of the application it certainly needs a review, nothing really aligns and flows. We have old information mixed with new information. I am used to reading reports and documents along with understanding the language. There is nothing that informs the public exactly what it is they are expected to do with this, what is indeed relevant / current and what indeed is not. A monumental amount of time and effort will be spent on this only for people ( myself included ) to discover that information is way out of date, this is not acceptable.

There are no benchmarks, there are no data sources to inform them on what they are meant to be comparing this to and there is no guidance. I can only assume that this not part of the legislation however it is not best practice.

How any member of the public is meant to navigate through and understand what exactly it is they are looking at is a very real concern. I do not see any supporting documentation to help the public at least understand this process or what it is they are looking at. There is a help section however this is more geared around the actual format of the documents themselves.

Most members of the public would need real support in even getting access to these reports, let alone understanding them and more to the point, do they even know it is there as it most certainly has not been communicated by IE.

Alongside my previous objections I must finally add after reading this more than once in my view this submission in not fit for public consultation and in my view would need a complete review by Infrastrata to ensure that -

- The data is current, up to date and relevant. I am reading a mix of reports that are intertwined which are between 1 & 13 years old. Most is >10 years old. Is this data acceptable, if so why is it?
- Of an acceptable format that can be reviewed and understood by all members of the public and stakeholders as currently not and we are discriminating against a large sector of the public here, in my view. Do you agree?
- Access to some level of support to ensure that the message and understanding is consistent to promote a more balanced view and credible feedback. Do you think that no support from IE is appropriate, if so please explain?
- Some greater level of awareness made to the public that this consultation is indeed live. Is this something “ Someone or some dept” is responsible for, if not what is the depts.



view of awareness to the public on this?

- Better support to those that cannot access these reports digitally. How do we mitigate that to ensure we are not discriminating against those that cannot or do we?

In a closing summary of my objection and after sending numerous mails this Marine Licence application has to be a collection of the most confusing and out of date documents I have read. If the consultation was 10/12 years ago then I could align the documentation to current legislation / local / commercial & strategic / political climate however as this data is so old, so much has changed both politically, environmentally and locally, most if not all of this submission is now irrelevant and cannot be used as part of the submission. I would need more up to date and relevant information to ensure that I was appropriately informed as currently with this suite of documents, I am not. This is not fit for purpose and I would appreciate if you could give me your view and some answers on my bullet points above, if you would be so kind.

I must finally apologise for the plethora of mails over the last few weeks to object to this application however this is down to the sheer fact that I have really struggled with the quality of the documents only to discover that what I am reading is now not applicable.

Have a great weekend, and thank you in advance.

kindest regards

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Energy Limited - ML 28\_12  
**Date:** 04 February 2020 22:46:57

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I refer to my letter of objection dated 3<sup>rd</sup> February 2019 regarding the above application and would be grateful if you could clarify the following points which, whilst integral to my objection and should be treated as such, require a more urgent response in order that I may further assess the application:-

As I have stated in my objection letter and mentioned to Joe Breen at one of the Information Sessions attended by DAERA, it is extremely difficult to ascertain what environmental information is still relevant and which documents have been partly, or wholly, updated. Please therefore clarify which parts of the Environmental Statements have been superceded and/or amended. Please provide "marked-up" versions of the documents so I may fully understand what updates have been completed. Alternatively, a list or table specifying what deletions or amendments have been done would suffice.

As I understand the project to be deemed "high risk" requiring the input of Health & Safety Executive NI and Geological Survey of NI, please provide copies of their consultation responses.

Please advise where I can locate a full set of detailed, to-scale drawings of what is proposed by the applicant, including detailed to-scale drawing showing precise location of where the caverns are proposed to be sited (ref: Page 16 of RPS' Report in 2019 Updated Application).

I look forward to hearing from you as soon as possible.

Regards,

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Marine Licence Consultation  
**Date:** 05 February 2020 10:11:45

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Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

I was a Chartered Civil Engineer for about forty years until retirement and in my early career I specialised in marine works. Subsequently, for some thirty five years, I was senior partner in a firm of Loss Adjusters dealing with major catastrophic incidents. I have grave reservations about the proposed scheme which is the subject of this Application.

Are there any precise plans of the location of the proposed caverns? I can recall being consulted many years ago in connection with subsidence cases arising from the salt mines at Eden, Carrickfergus. These were quite remote from the workings and in the present case I would like to be able to ascertain the precise locus of the proposed caverns.

Could I possibly have copies of the Consultation responses from GSNI and HSENI.

Have the Environmental Statements been amended following their initial submission. Are these amendments significant?

I should be grateful for a response.

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Energy  
**Date:** 05 February 2020 13:41:57

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Good afternoon

As a local member of the community at Islandmagee I am emailing to voice my own approval in favour of the Islandmagee energy project

After attending one of the consultation meetings at the gobbins centre myself and a few others spoke to employees of the company and a panel of members of the DAERA and I'm pleased to say that I am in favour of the project as it will benefit the country in many ways , not only having a secure supply of gas from the mainland if an issue was to occur but also a rise of employment it will bring to the local community , DAERA have been very informative and assuring minimal risk to the surrounding sea area around the project.

Many thanks.

[REDACTED]

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**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Marine licence  
**Date:** 05 February 2020 13:47:17

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Hi, iam a life long resident of islandmagee and want to register my support for infrastrata and their project. I have already seen benefits with the local school, brownie and football club all receiving funds and thats before the promised 1 million. In my opinion it is a no brainer, funding and jobs with minimal damage to the environment. ( this is found out by attending every public consultation meeting ) Many thanks

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Energy MarineLicence Consultation ML28\_12  
**Date:** 05 February 2020 16:24:18

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Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast

Regarding: Islandmagee Energy Marine Licence Consultation ML 28\_12

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

My family has lived in Islandmagee for generations. As a child growing up here I could not have imagined that such a proposal would ever been raised let alone considered. What level of damage to the area is acceptable when a project such as this is proposed? My home is an area of outstanding beauty, not just above ground but also in the sea. When I snorkel and dive I love to see the incredible variety of sea life. I have traveled the world and home is as, if not more beautiful than any other area of protected nature as we have have on our doorstep.

Also, I heard that the company proposing all of this have become involved with Harland & Wolfe. Is there any likelihood that could be taken in to account when deciding on licence applications? Will there be political pressure to allow it? Who will be making the final decision and therefore will be answerable if things go wrong?

I look forward to hearing from you.

Yours faithfully

[REDACTED]

[REDACTED]



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Energy Marine License Consultation ML28\_12  
**Date:** 05 February 2020 17:47:15

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Email:

[REDACTED]

5th Feb, 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise. As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

I have serious concerns over the safety of these underground gas caverns both during construction *and in the long term*. *Gas caverns are deemed a high risk project by the Health and Safety Executive*, details of the HSE findings can be found at; <https://www.hse.gov.uk/research/rrpdf/rr671.pdf>

I would also like to express my concerns as to whether or not full consent has been obtained from the Hazardous Substance Authority for the storage of such a high quantity of Natural gas in underground caverns, and, in the event of any leakage or escape of the gas, has the HSENI considered the hazards and risks which this hazardous substance may present to property and the inhabitants, both people and livestock in the area.

Worldwide, gas cavern failure has claimed lives and destroyed property as far away as 3 miles from the underground caverns, fault lines below Larne Lough could allow the escape of gas into the surrounding areas of Larne, Glynn, Magheramourne, Islandmagee, Ballycarry and even as far away as the Salt Mines near Kilroot. I have concerns about Islandmagee Energy / Infrastratas overall Risk Assessment involving the Control Of Major Accident Hazards Regulations 2015 (COMAH) and what their emergency plan is in the event of a major or catastrophic escape of gas, and will they be held accountable for all damages and destruction.

I live with my family in Larne, 2,300m from this proposed gas storage site and I believe the issuance of any license facilitating a gas storage project will have an adverse effect on our wellbeing and personal peace of mind should anything go wrong with the construction of, filling and storage of 450 – 500 million cubic metres of gas stored at a pressure of approx. 300bar (4351psi) 1500mtrs below Larne Lough. I would also like to draw attention to the fact that Islandmagee Energy / Infrastrata according to their website say they, and I quote them as having published on their website;

*“The company has been consulting and liaising with the local communities in Islandmagee and Glynn since 2007. In 2013 a Community Liaison Group (CLG) was established to further enable Islandmagee Energy and the community to work together to help minimise any impacts of the facility on its neighbours. The group not only provided a forum for the company to share information about upcoming project activities but also a mechanism for reporting on actions taken in response to concerns raised by the local community and other stakeholders.”*

I would say this was an inaccurate claim as very few people living in the town of Larne (with a population of approximately 32,000 inhabitants) who may be affected by this undersea storage know nothing of this proposed project on their doorstep, Islandmagee residents were all presented with information by way of booklets posted to individual addresses, Larne residents have yet to be informed.

I also have serious concerns over the long term safety and as to what will happen when these caverns reach their end of life term, and to whom will accountability fall should things go wrong? I have asked this question to representatives of Islandmagee Energy and Infrastrata to be told “we just fill them with water and plug them” I personally don’t think it’s just as easy as that and I think this is a valid question to have answered.

There has been quite a bit of speculation over the change of use of these caverns as the need for Natural gas is declining and we are becoming less dependent on it, word has it the caverns may be used as storage for Hydrogen gas, which is more volatile than Natural gas,

and also for the storage of Nuclear waste and Carbon capture storage. I would like this scenario to be put to Islandmagee Energy / Infrastrata for clarification as this is of even more concern to me.

During the construction phase of these gas caverns there will be approximately 24,000m<sup>3</sup> of warm hypersaline toxic brine pumped into the sea 450m from the shore at Castle Robin, Islandmagee. This will cause a total and complete benthic dead zone which will affect all other sea life in the area. This area is a Designated Special Area of Conservation for Harbour Porpoise and I believe this toxic brine will drive all the sea life away and kill everything including Shellfish and Seaweeds. Nesting Sea birds on nearby ASSI. Muck Island just off Portmuck which is also home for Northern Ireland's only land based breeding Puffin colony, and Larne Lough SPA which has a colony of endangered Roseate Terns will be affected as the sea life food chain is destroyed, My concern is the size of area which will be affected, with the incoming tide running North – South and the outgoing tide South – North the plume of hypersaline toxic brine will increase daily and may reach as far North as Garron Point and as far South as Copeland Islands. This is going to leave a huge area of dSAC destroyed.

Another concern I have is the direct affect this project may have on the local community who use this area around Islandmagee for leisure pursuits such as fishing, swimming, diving and boating, it will possibly and most likely leave the coastline so polluted and discoloured from the discharge of so much mud and hypersaline brine as to also have an adverse effect on local tourism which may destroy all the hard work done to reinstate our Gobbins Cliff Walk. Local industry such as Fishermen and Lobster Fishermen and Shellfish Fishermen could have their livelihoods destroyed by the brine plume suffocating the area and killing sea life and nutrients.

Furthermore I have concerns that Islandmagee Energy / Infrastrata have stated 400 jobs for the local area, I believe this to be a total fabrication. During the construction phase there may be a few jobs for local labourers, most of the works will be specialist and will be undertaken by out of area contractors, on completion of the project it will be run by minimal staff including security. I believe this project will not contribute in any great way to employment in the area.

I also have concerns about the future need for gas in Ireland, gas is being phased out and being replaced with green energy which is developing quickly. Islandmagee Energy / Infrastrata have not included in their public consultation documents any evidence of a need for gas storage in Ireland. Gas supply in Ireland is secure for at least 30 years, we have 3 pipelines supplying gas from UK mainland and the Corib Gas Field off the West coast, so this is evidence we do not need any type of gas storage.

Gas is already an expensive fuel and I believe the cost of creating these gas caverns is going to be passed onto the consumer making it even more expensive, I would like to know how Islandmagee Energy / Infrastrata can excavate 7 caverns store 500 million cubic metres of Natural gas and sell it on for profit without pricing themselves out of the market, or is there going to be no competition for gas supply?

Another of my concerns is the Scottish Northern Ireland Pipeline (SNIP) Twynholm to Ballylumford which supplies a large percentage of gas to Northern Ireland, will need to be either converted to a reversible line or twinned at great cost. Who will be paying for this? Is the cost going to be passed on to the Northern Ireland consumer? According to the Mutual Energy report on Northern Ireland Gas Capacity Statement 2018/19 – 2027/28

Twynholm Entry Point, which has a contractual capacity limitation of 8.08 million standard cubic metres per day (mscm/day), with a contractual minimum inlet pressure of

56barg, and; Gormanston Entry Point, which has a capacity limitation of 6.0mscm/day

The modelling concluded that the Northern Ireland transmission network has sufficient capacity to meet the forecast demand scenarios over the next ten years, without breach of contractual pressure requirement of 12barg.

As a resident and member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006, the Department of Agriculture, Environment and Rural Affairs has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

Yours Faithfully

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

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas Caverns  
**Date:** 05 February 2020 18:25:41

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To whom it may concern

I recently attended the local public consultation in Islandmagee regarding the Gas caverns projects.

As a local resident all my life it is a project I have kept a close eye on over the years. It was good to get the opportunity to speak to Daera and get a better and fuller understanding of the processes involved. Obviously the main concern was the environmental impact it would have but it was good to hear that the rumoured 3 mile dead zone was only 100 sq metres.

As a member of [REDACTED] that has been recently told we would be losing our jobs soon it was refreshing to hear that many jobs during and after construction would be created in these uncertain times.

And finally as a member of the local football club and with family members at local schools it is also good to see the support that Islandmagee Energy have shown in recent times by providing funding for both and will continue to do so in the future.

I am very much in favour of this project as I feel it will provide a much needed boost for the local area and indeed Northern Ireland as a whole.

Many thanks

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Energy Marine Licence Consultation ML 28\_12  
**Date:** 05 February 2020 20:45:08

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[REDACTED]

Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
Dear Sir / Madam,  
Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12

I am writing concerning the Marine Licence Application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposed development of underground caverns below Larne Lough for the storage of natural gas. I have thoroughly looked through the public consultation documents and I would like to strongly voice my support to the project and the Marine Construction Licence application.

I understand the need for this project and the role it may play in enhancing the efficiency and sustainability of energy supplies in Northern Ireland, and the unique and innovative way it will store energy. This would ensure security of supply of gas going forward, safeguarding supply if Northern Ireland was to become isolated from the mainland UK. The project also represents a significant and much needed investment in Northern Ireland's energy infrastructure and will bring jobs to the area during its construction and especially the long term during its operation. Local employment is extremely important to the community around the Islandmagee area. This project will help keep young people in the area and bring new people to Islandmagee, therefore positively bringing trade to local shops and businesses.

As an Islandmagee resident for all of my life I also understand the benefit this project could bring to local groups and organisations through the 1 million pound community fund. This would bring huge benefits to our local organisations, clubs and groups who struggle for funding and financial survival yet are such a crucial and valuable asset to the local community. The importance of this fund and what it would bring to the local area cannot be overlooked.

Whilst I understand some local residents have environmental concerns, I have total faith in the experts in this field and environmental agencies to ensure everything is done correctly and that any issues to marine life are limited. Having attended the consultation days I have absolutely no concerns about this project causing any long term damage to the environment.

I confirm my full support for the project and the contribution it will make to the Islandmagee area. I support a positive decision from DAERA to approve the marine license for the project.

Yours Sincerely,  
[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee gas storage  
**Date:** 05 February 2020 20:53:05

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To whom it may concern

I wish to object to the license been granted or considered for this project I have read all the documents associated with this project and have attended local meetings about this with the company concerned My objections are as follows 1 Islandmagee is home to one of the largest population of puffins on the Island of Ireland and we also have porpoises and seals and if this project is allowed to go ahead no one knows the harm this will to the wildlife as the company concerned told me the wildlife will all move away for a number of years and then return when it's finished so in other words we will kill off all the sea life do a runner and leave whoever to clean up the mess

Our islands has the Gobbins centre wish attracts over 30,000 visitors per annum to see the sea and cliffs wildlife what will we do with tourism when we have nothing to show them 2nd our small roads can't handle the local traffic at present and the company told me the department of infrastructure with renew the roads to take their heavy vehicles again once they leave the island we will be left for the next 20-30 years with badly damaged roads and it's our tax that's paying for them

Lastly due to climate change our local government is looking to do away with gas usage within 15 years so no new buildings will have it fitted

Please help us save our precious island and it's wonderful wildlife for years to come and reject this short term gain for shareholders of a company who do not care about Northern Ireland

Regards

[REDACTED]

Sent from my iPhone

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12  
**Date:** 05 February 2020 21:46:37

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5 February 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

**MARINE/NATURAL WORLD**

- Discharge of up to 1000m<sup>3</sup> of hypersaline brine per hour per day (24,000m<sup>3</sup> of toxic brine per day) for 4 years into the sea, just 450m from the shore near Castle Robin at Islandmagee, creating a benthic dead zone.
- Designated Special Area of Conservation (North Channel dSAC, directly into which the hypersaline brine will be discharged, recently designated for Harbour Porpoise)
- Special Protected Areas: Proposed East Coast (NI) Marine SPA (abstract/discharge area is within the pSPA boundary)
- Larne Lough SPA (with red flagged endangered Roseate Tern a priority species)
- Areas of Specific Scientific Interest (ASSIs: The Gobbins, Muck Isle, The Maidens)
- Only Northern Ireland land based breeding puffin colony near to discharge area
- Death of sea-life and prey species (potential impact on the food chain)
- Threat to sea birds and feeding grounds
- Concerns that protected species porpoises/otters/dolphins could be displaced

**EFFECT ON PEOPLE**

- Potential impact on leisure pursuits fishing/diving/swimming/boating
- Potential negative impact on tourism / Gobbins Project
- Potential impact on local industry, fishermen, lobster fishermen



**LACK OF NEED**

- Only a “skeleton staff” required to operate facilities after construction according to the public consultation documents.
- No evidence of need for the gas storage provided in the public consultation documents

**CAVERN CONCERNS**

- Serious concerns over cavern safety, now and the long term.
- Deemed a high risk project by Northern Ireland Health and Safety Executive.
- How any licences facilitating the gas storage project will affect your peace of mind and well being.

Kind regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Cc:** [Nells](#)  
**Subject:** Re: Marine Construction Licence Application ML 28\_12 OBJECTION  
**Date:** 05 February 2020 21:54:19

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Sent from my iPhone

On 5 Feb 2020, at 17:57, Fi <[REDACTED]> wrote:

[REDACTED]

Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

5<sup>th</sup> February 2020

To whom it may concern

**Islandmagee Energy (Infrastrata) Marine Construction Licence  
Application ML 28\_12. OBJECTION**

Having read the public consultation documents, I write to formally lodge, in the strongest of terms, an objection to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining.

There are several aspects of this project that give myself, and wider family, serious concerns. The absence of any 'meaningful' engagement has made it difficult to differentiate between the accuracy of limited information provided by Infrastrata and the hyperbole that they have generated. Infrastrata may argue that they have offered community information days. However, communications around these events

were often confused, incorrect and very last minute.

I recognise the challenging issues around energy security. However, I'm disappointed that Northern Ireland is not at the forefront of pioneering a much more innovative and environmentally sustainable solution to these issues. Why are we developing new and apparently advanced technologies that are intent on destroying our marine habitat?

While I am not a scientist nor a technical expert on these matters, I am deeply uncomfortable that collectively, we do not yet understand the unintended consequences of a project of this scale. As an active citizen I have a strong sense of stewardship and firmly believe that the legacy we leave for future generations should be one that makes us proud.

I find it deeply uncomfortable that we are selfishly solving a problem for a single generation that will have devastating consequences for many generations into the future. My understanding is that a discharge of up to 1000m<sup>3</sup> of hypersaline brine per hour per day (24,000m<sup>3</sup> of toxic brine per day) for 4 years into the sea, just 450m from the shore near Castle Robin at Islandmagee, will create a benthic dead zone.

My household are regularly involved in local water-based activities. We greatly enjoy the diverse marine and bird activity. It is heart-breaking to think that the regular sightings of Seals, Dolphins, Otters, Puffins and Roseate Tern's may be consigned to the past if these species are displaced as a result of this project. Their departure will negatively impact on the whole food chain and other wildlife for the area. It was my understanding that Larne Lough, The Gobbins, Muck Island and the Maidens are designated Special Areas of Conservation. How does that status sit with this project?

Similarly, I cannot understand how this project aligns with a tourism strategy or economic development for the region which, after significant investment, is starting to build momentum and focuses heavily on the natural landscape and wildlife. I have concerns around the detrimental economic impact due to potential property price reduction, lost tourism and the subsequent impact on local businesses reliant on tourism.

Issues around mental health and wellbeing are increasingly prevalent within our society. Islandmagee provides a wonderful backdrop to encourage healthier lifestyles. This can only have a positive impact on the ever-stretched health purse. Charities like Hope House choose Brown's Bay as their location to enable people to recuperate during their treatment for cancer. Swimming, rowing, and boating in general are increasingly popular pursuits amongst residents of the surrounding area and these activities would be very limited if this project were to proceed.

Finally, I have concerns over the probity of the company behind this project. They have glossed over several issues including:

- the longer-term safety of the caverns
- the evidence around the need of gas storage
- the licencing around the project.

Statements around employment opportunities and environmental impact appear overstated and have no evidential substance.

With so many unknowns and potentially serious consequences, I strongly believe that a decision to progress this licence cannot be made.

Yours faithfully

A solid black rectangular redaction box covering the signature area.

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Caverns  
**Date:** 05 February 2020 22:32:46

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Dear Sir/Madam,

What the hell are you thinking???? I have only just recently heard about your forthcoming plans and am truly horrified. What part of blasting 7 mighty holes with supercharged brine sounds good to you?? I'm asking and expect an answer!!

You quite obviously don't live in the neighbourhood or surrounding vicinity, because if you did, your love for the area would cause you to defend it with a vengeance.

Fishing is a joy and wonder that has declined because of greedy fishing just off the coast. The wildlife in the area is fabulous, but would be nonexistent if your plans go ahead. Does that not bother you??? You will kill all hopes and dreams of blackhead becoming more of an attraction than it already is. Monies have been spent on restoring this area, why kill it?? I expect an answer!!

Whose pocket are you lining, yourself obviously, but whose else??

I will be observing closely, don't you dare just go ahead without listening to the voices around you. I don't know who you are and have no desire to, but know, I am prepared to die to preserve today for tomorrow. You have no right to take that away from our future

Yours most sincerely

[REDACTED]

Sent from my iPhone

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Ref:Islandmagee Energy Marine Licence Consultation ML28\_12  
**Date:** 06 February 2020 01:15:47

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Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

From [REDACTED] [REDACTED]

Email: [REDACTED]

Feb 05- 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

**I believe in the current Climate and Biodiversity emergency it is immoral to allow what is effectively ecocide. The discharge of hypersaline brine for 4 years into the sea, just 450m from the shore near Castle Robin at Islandmagee, will create a benthic dead zone, this has been stated as a fact, the only issue will be the scale and impact of the loss to biodiversity.**

If this were not being justified as an industrial process but was merely a polluter dumping into the sea it would be judged morally unacceptable.

The area is known to those who live and visit as an area that enjoys a high level of biodiversity in both the marine and land environments. There are a number of highlights which deserve consideration such as the Areas of Specific Scientific Interest (ASSIs: The Gobbins, Muck Isle, The Maidens) containing an abundance of wildlife e.g. puffins, harbour porpoise,

The land and sea together form this ecosystem. The marine environment adjacent to all of this must be considered for urgent protection. The UK has signed up to the Convention for the Protection of the Marine Environment (22/08/1992) OSPAR and Northern

Ireland has already established Marine Protected Zones “to ensure that the future development of Northern Ireland's seas follow the environmentally sensitive 'Ecosystem Based Approach' and promotes a stable, sustainable and biologically diverse future for our local seas.”

This planning application is adjacent to a site that was overlooked in the recent round of Marine Protection Zones. The Puffin Colony (Fratricular Arctica) on Islandmagee is the only onshore breeding colony in Northern Ireland and is an endangered bird. The Puffins live in the area which is protected as an ASSI [https://www.doeni.gov.uk/publications/gobbins-  
assi](https://www.doeni.gov.uk/publications/gobbins-assi) However, crucially ASSI status does not extend to the marine environment. In addition to the puffins there are Kittiwake, Fulmar, Razorbill, Cormorant and Shags living in this area. Scientific studies of seabird decline around the world make sobering reading with estimates as high as 70% decline as a group overall in the last 60 years. I believe the area around Islandmagee should be considered as an MPZ and until a through analysis for this has been carried out this planning application should not be granted. <https://www.doeni.gov.uk/consultations/marine-conservation-zones-consultation>

Finally, one of the most concerning species, for me, that may be negatively impacted in this brine dead zone is the Common Skate. See Pg 47 for evidence of catches in the area. <http://irish-trophy-fish.com/wp-content/uploads/2018/01/Irish-Specimen-Fish-Committee-Report-2017.pdf> The Common Skate is a Critically Endangered animal, I am sure you are aware of the severity of this designation, the Common Skate that was fished competitively in Strangford Lough as recently as the 1970's is now at serious risk of extinction. Other critically endangered animals include the Bengal Tiger, the Sumatran Orangutan and the Black Rhinoceros all of which there are considerable efforts to protect.

Rather than allow the creation of a dead zone in an area containing these beautiful and rare creatures, who are not known for migrating, I would ask again that consideration be given to the creation of a Marine Protection Zone. <https://www.iucnredlist.org/species/39397/10198950>

Other issues include the tidal slack water that is experienced locally, making modelling of the proposed dead zone difficult and the lack of robustness of the company involved in this project, Infrastrata, whose share prices have tumbled from £4.13-0.31p [https://www.google.com/search?  
q=infrastrata+share+price&oq=infrastrat&aqs=chrome.3.015j69i57j0l2.9524j0j7&sourceid=chrome&ie=UTF-  
8](https://www.google.com/search?q=infrastrata+share+price&oq=infrastrat&aqs=chrome.3.015j69i57j0l2.9524j0j7&sourceid=chrome&ie=UTF-8) calling into question their ability to deliver such a large scale project when much bigger, well financed companies have already pulled out.

Tourism investment in this area has been substantial and successful. The local economy has seen recent diversification and growth including oyster farming, the film industry, Gobbins Coastal Path etc. There is real optimism that a sustainable future is possible here and it is all in line with the vision of future proofing a rural economy. This enhancement of Islandmagee now has the potential to be seriously and negatively impacted by this project.

On a personal note, as a child I grew up snorkelling in Browns Bay and Portmuck, this experience lead me to an awareness and appreciation of the natural world which has shaped my life. This area is a special area for many people. At the end of the BBC series 'The Blue Planet 2' Sir David Attenburgh states that 'The future of all life depends on us' Government

Departments in NI cannot save life on earth but they can take a precautionary approach to the area with which they are entrusted. I trust you will consider how the sea around Islandmagee fits into the bigger picture when considering this Marine Licence.

Thank you for considering my submission

[REDACTED]



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas Storage Project December 2019 Consultation ML 28\_12  
**Date:** 06 February 2020 10:04:10

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Marine Licensing Team

I refer to the consultation on the above subject and object to the granting of a marine licence.

As a resident of the area I share major concerns expressed by people lobbying to prevent the potential harmful effects that this project would have on the local environment and wildlife. I fully appreciate that as a society we face significant demands relating to the future of the energy industry, however this issue should never endanger our natural environment.

I do not claim to be an expert on energy sources or on the environmental wildlife, however the processes involved in the project must pose a considerable risk to the sustainability of both coastal and sea life for many years into the future. This is surely too great a price to pay.

I hope that you take into account the environmental concerns raised by people from the area and refuse the issue of a marine licence for the project.

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Marine Licence ML28-12  
**Date:** 06 February 2020 11:14:32

---

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

I am concerned about the following:

- Discharge of up to 1000m<sup>3</sup> of hypersaline brine per hour per day (24,000m<sup>3</sup> of toxic brine per day) for 4 years into the sea, just 450m from the shore near Castle Robin at Islandmagee, creating a benthic dead zone.
- Designated Special Area of Conservation (North Channel dSAC, directly into which the hypersaline brine will be discharged, recently designated for Harbour Porpoise)
- Special Protected Areas: Proposed East Coast (NI) Marine SPA (abstract/discharge area is within the pSPA boundary)
- Larne Lough SPA (with red flagged endangered Roseate Tern a priority species)
- Areas of Specific Scientific Interest (ASSIs: The Gobbins, Muck Isle, The Maidens)
- Only Northern Ireland land based breeding puffin colony near to discharge area
- Death of sea-life and prey species (potential impact on the food chain)
- Threat to sea birds and feeding grounds
- Concerns that protected species porpoises/otters/dolphins could be displaced

Yours faithfully

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Energy Marine Licence ML 28-12  
**Date:** 06 February 2020 12:43:17

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Email: [REDACTED]

January 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

- Discharge of up to 1000m<sup>3</sup> of hypersaline brine per hour per day (24,000m<sup>3</sup> of toxic brine per day) for 4 years into the sea, just 450m from the shore near Castle Robin at Islandmagee, creating a benthic dead zone.
- Designated Special Area of Conservation (North Channel dSAC, directly into which the hypersaline brine will be discharged, recently designated for Harbour Porpoise)
- Special Protected Areas: Proposed East Coast (NI) Marine SPA (abstract/discharge

area is within the pSPA boundary)

- Larne Lough SPA (with red flagged endangered Roseate Tern a priority species)
- Areas of Specific Scientific Interest (ASSIs: The Gobbins, Muck Isle, The Maidens)
- Only Northern Ireland land based breeding puffin colony near to discharge area
- Death of sea-life and prey species (potential impact on the food chain)
- Threat to sea birds and feeding grounds, especially the critically endangered roseate tern bird which is one of the rarest breeding sea birds in Europe which has successfully bred on the nearby Blue Circle Island.
- Concerns that protected species porpoises/otters/dolphins could be displaced.

Yours faithfully

[Redacted signature]

[Redacted signature]  
[Redacted signature]  
[Redacted signature]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Date:** 06 February 2020 13:33:45

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Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Email: [REDACTED]

January 2020

Dear Sir / Madam,

Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

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Sent from Outlook Email App for Android

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Energy Marine Licence Consultation ML 28\_12  
**Date:** 06 February 2020 13:49:18

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Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast,  
BT7 2JA

6th February 2020

Dear Sir / Madam,

Re: Islandmagee Energy Marine Licence Consultation ML 28\_12

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, apart from a private company making money, why is there a need for this project? I can see no acceptable reason for taking any risks with the environment. With the NI Assembly voting in favour of declaring a Climate Emergency, the assembly has recognised that we are facing a climate breakdown and a biodiversity crisis! The executive has been called upon to fulfil climate action and our environmental commitments.

MLA's have called for an Independent Environmental Protection Agency to be established within the next 12 months, given the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise. As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

Bringing your attention to the consultation documents submitted; Ecological Survey for Birds document whereby it stated that 18 hours of surveying had taken place to comprehend this report and suggests in 3.3.1.1 that *'Only one record of a single Common Tern was recorded during survey. The bird was observed flying through the survey area on 30th July. Previous surveys and tracking data showed that tern species tended to avoid the area identified as potential zone of influence of a brine outfall for feeding'*.

As a resident of Mullaghboy, I walk around Portmuck, Browns Bay & Skernoghans Point, daily, year-round, observing the wildlife throughout the seasons and I strongly object to the validation of this report as a comprehensive account. Please take on board it is noted in this report that Early Breeding season was not surveyed for the purpose of this report. Throughout April/May each year, I concurrently bear witness to hundreds of Common Tern and Gannets plunge diving to feed on the abundance of herring shoals to this area, which in turn is used to feed their young during the early breeding nesting season.

The common skate is listed as **Critically Endangered** on the IUCN Red List and a protected species in Northern Ireland. It is a Priority Species under the UK Post-2010 Biodiversity Framework. What consideration has been given to the Common Skate in the area that will be directly affected by the discharged brine?

As a resident, I view this proposal as detrimental to the environment in this special and beloved area. What provisions are being put in place for the residents of Islandmagee should this environmental vandalism be allowed to go ahead? Infrastructure? Noise Pollution? There has been very recent seismic activity in the area adding to the risk of a rupture or damage to the proposed underground caverns (see reference 1. below)? Insurance brokers have stated that home insurance in this area will rise due if this project goes ahead. The health and wellbeing of the residents are being put at risk so that shareholders of this project can make money. I heavily invested to live in this area that housed these sensitive and protected environmental habitats.

1. <https://www.insn.ie/2019-12-18-m1-6-offshore-antrim/>

Yours sincerely,



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Objection to Gas Cavern Project in Islandmagee  
**Date:** 06 February 2020 14:04:14

---

I wish to object to the Gas Cavern Project in Islandmagee, Co Antrim.

As a local resident in Whitehead Co Antrim, and a frequent visitor to the beautiful coastline around Islandmagee, I have been horrified to hear of the plans for Gas Caverns. The subsequent environmental consequences of such a planned project could be catastrophic for the local environment.

We are the guardians of our environment and we should be putting the protection of our environment above profits for big companies. There has been no support for such a project and the only ones to benefit are faceless shareholders from large companies.

Please take into consideration my expression of disapproval and strongest possible opposition to this project.

Regards

[REDACTED]

Sent from my iPhone

Sent from my iPhone



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Marine Construction Licence Application 2019 ML 28-12  
**Date:** 06 February 2020 15:50:36

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Dear Sir/Madam

I would like to put on record my opposition to the above marine licence being granted. I am a life long resident of Islandmagee and oppose the licence being granted for the following reasons :

- Larne Lough is an incredibly valuable wildlife habitat with a wide variety of over wintering birds such as Brent geese (which are amber listed by RSPB), Canada geese, little egrets and whooper swans. These will be seriously disturbed by the work going on around the Lough.

- there are huge tern colonies during the summer months - again which will be distributed by the work. The Gobbins cliffs are home to a large variety of sea birds including puffins which will starve if their main food sources are killed by the brine discharge.

- otters have been sighted recently in Larne Lough near the proposed well pad - again work in the area will disturb them.

- harbour porpoises and dolphins are a very common sight in the waters around Islandmagee and it would be such a shame if we were to lose them from our shores.

The loss of this valuable marine habitat would be unbearable to local residents and visitors to Islandmagee, Larne, Whitehead and the wider East Antrim area. This would have such a detrimental effect on tourist businesses which have sprung up in the local area.

For these reasons I ask that you do not grant a Marine Licence to this project.

[REDACTED]

Sent from my iPad

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12  
**Date:** 06 February 2020 15:59:37

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6th February 2020

Dear Sir / Madam,

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise. In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

### **MARINE/NATURAL WORLD**

- Discharge of up to 1000m<sup>3</sup> of hypersaline brine per hour per day (24,000m<sup>3</sup> of toxic brine per day) for 4 years into the sea, just 450m from the shore near Castle Robin at Islandmagee, creating a benthic dead zone.
- Designated Special Area of Conservation (North Channel dSAC, directly into which the hypersaline brine will be discharged, recently designated for Harbour Porpoise)
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- Larne Lough SPA (with red flagged endangered Roseate Tern a priority species)
- Areas of Specific Scientific Interest (ASSIs: The Gobbins, Muck Isle, The Maidens)
- Only Northern Ireland land based breeding puffin colony near to discharge area
- Death of sea-life and prey species (potential impact on the food chain)

- Threat to sea birds and feeding grounds
- Concerns that protected species porpoises/otters/dolphins could be displaced

### **AFFECT ON PEOPLE**

- Potential impact on leisure pursuits fishing/diving/swimming/boating
- Potential negative impact on tourism / Gobbins Project
- Potential impact on local industry, fishermen, lobster fishermen

### **LACK OF NEED**

- Only a "skeleton staff" required to operate facilities after construction according to the public consultation documents.
- No evidence of need for the gas storage provided in the public consultation documents

### **CAVERN CONCERNS**

- Serious concerns over cavern safety, now and the long term.
- Deemed a high risk project by Northern Ireland Health and Safety Executive.
- How any licences facilitating the gas storage project will affect your peace of mind and well being.

As a resident in the immediate vicinity of the proposed project, I can not stress enough how strongly I am opposed to this.

Regards

A large black rectangular redaction box covering the signature area.

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Energy Marine Licence ML 28\_12  
**Date:** 06 February 2020 16:17:08

---

Dear Sir / Madam,

Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

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As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

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- Death of sea-life and prey species (potential impact on the food chain)
- Threat to sea birds and feeding grounds
- Concerns that protected species porpoises/otters/dolphins could be displaced

Yours faithfully

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Marine license  
**Date:** 06 February 2020 16:51:19

---

To whom it may concern.

I recently attended the public consultation regarding the gas caverns in islandmagee, for many reasons I am very much in favour of this project going ahead. Mainly the creation of jobs over a period of time and the boost it will give the local area in general. I currently work local to islandmagee for a company called sensata technologies and have recently found out I will be made redundant this year so it is good to see new jobs coming to the local area.

Many thanks.

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee gas storage marine license  
**Date:** 06 February 2020 17:14:13

---

To whom it may concern

I am a local resident of islandmagee and I give my full support to the gas storage project. It is great to see a company invest in Northern Ireland and hopefully they will create many jobs.

I have every faith in Infastrata that everything will be done to minimize any effects the manufacturing of the caverns will cause and the long term rewards for Northern Ireland will be great

Regards

[REDACTED]

[Sent from Yahoo Mail on Android](#)

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee energy marine licence  
**Date:** 06 February 2020 17:42:25

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06.02.2020

Dear Sir / Madam,

Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

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In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

Discharge of up to 1000m<sup>3</sup> of hypersaline brine per hour per day (24,000m<sup>3</sup> of toxic brine per day) for 4 years into the sea, just 450m from the shore near Castle Robin at Islandmagee, creating a benthic dead zone.

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- Only Northern Ireland land based breeding puffin colony near to discharge area
- Death of sea-life and prey species (potential impact on the food chain)
- Threat to sea birds and feeding grounds
- Concerns that protected species porpoises/otters/dolphins could be displaced

Yours faithfully

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Marine Licence Objection letter  
**Date:** 06 February 2020 19:41:43

---

February 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

*As a local resident I am very angry that planning permission has already been granted to Islandmagee Energy/Infrastrata when there have been very little facts or risk assessments presented to the public.*

*To date the public have not seen any GSNI survey information to dissuade fears about geological faults and the very real threat of a massive gas explosion occurring.*

*It is also very disappointing that an area which has been designated as a special conservation area is under threat, my question is why give an area*





*those projects which encourage renewable energy production and which have minimal impact in the local habitats within our country.*

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** F  
**Date:** 06 February 2020 19:43:24

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**Subject: Objection - Marine Construction Licence application 2019  
Consultation ML 28\_12 by Islandmagee Energy/Infrastrata**



06/02/2020

Dear Sir / Madam

With reference to the Marine Construction Licence application 2019 Consultation ML28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable sea water abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining. I have examined the public consultation documents and I wish to **strongly object** to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposed project has been made available for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone which will be created in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public enquiry, as under Regulation 17 of the Water Abstraction and Impoundment Licensing Regulations (NI) 2006, the Department has the power to order a public enquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

Over the last 55 years I have regularly swam & fished at Port Muck & Browns Bay, I have also taken my children & their friends there to do the same and wish to maintain the crystal clear waters for my grandchildren and future generations to do the same.

I remember my father and grandfather campaigning against the discharge of rubble into Larne Lough from the quarry at Magheramourne as they were keen on the wildlife in that area. No one listened then, the dumping continued until most of the wildlife was wiped out in the Lough. I hope someone is listening this time before it's too late.

Beautiful Islandmagee has for far too long been used as a convenient industrial site for greedy power companies and the like and this proposal is quite simply a step too far.

A discharge of up to 1000m<sup>3</sup> of hypersaline brine per hour per day (24,000m<sup>3</sup> of toxic brine per day) for 4 years into the sea, just 450m from the shore near Castle Robin at Islandmagee, would create a benthic dead zone. Dead zones are hypoxic areas in the world's oceans and large lakes, caused by 'excessive nutrient pollution from human activities coupled with other factors that deplete the oxygen required to support most marine life in bottom and near bottom water'. Fish & other marine life would die but despite most other life forms being killed by the lack of oxygen in dead zones, **jellyfish** can thrive in vast numbers .... I certainly wouldn't want children to swim among jelly fish.

The knock-on effect of a dead zone would be the threat to sea birds & feeding grounds. Protected species eg Porpoises, Otters, Dolphins etc could be displaced.

The only NI land-based breeding puffin colony is near to the discharge area.

There is so much emphasis on climate change being caused by mankind and our pollution of the sea. Halting climate change requires a global effort. We as a local community in Islandmagee want to help slow down climate change. We should be preventing creation of dead zones not helping create them!

For the above reasons and many more, I wish to strongly object to the issuing of a Marine Construction Licence as per the Public Consultation.

Yours faithfully



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**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Energy Gas Caverns  
**Date:** 06 February 2020 19:50:03

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To whom it may concern,

After attending the public consultations and speaking to your representatives I have a much more clearer understanding of this project. My main concern before attending the public consultation was the damage to the environment but I now believe and know that this will be very limited and the experts will ensure everything is done correctly.

The job opportunities for now and in the future that this project will create would be fantastic for the area and will be a boost for the whole community in general and this can only be a positive step in this day with so many companies closing so it is fantastic to see a company wanting to invest and providing jobs for now and in future.

As a local resident of Islandmagee my entire life it is fantastic to see the match funding Islandmagee Energy is putting into and will continue to put into our community which will benefit so many different groups and this is well needed and supported by many residents.

I am fully in support of this project and look forward to seeing this project progress further in the upcoming times.

Many thanks  
[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Energy Marine Licence Consultation ML 28\_12  
**Date:** 06 February 2020 19:55:27

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[REDACTED]  
[REDACTED]

January 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by IslandmageeEnergy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

*Environmental and concern for health.*

[REDACTED]

Sent from my iPhone

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Proposed Gas Storage Caverns in Larne Lough  
**Date:** 06 February 2020 19:55:45

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[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
Date 06/02/20

Dear Sir / Madam,

With reference to the Marine Construction Licence application 2019 Consultation ML28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable sea water abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining. I have examined the public consultation documents and I wish to strongly object to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposed project has been made available for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone which will be created in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public enquiry, as under Regulation 17 of the Water Abstraction and Impoundment Licensing Regulations (NI) 2006, the Department has the power to order a public enquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime, I wish to strongly object to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons.

**1. Marine and Bird Life.** Discharging super saturated brine extracted from the caverns into an Area of Special Scientific Interest and Designated Special Area of Conservation will undoubtedly have a negative impact upon the animals, bird life and sea life within the area of discharge. There are significant examples of these such as Harbour Porpoise, Roseate Terns, White Egrets and Puffins which are peculiar to the proposed areas of extraction and discharge.

**2. Safety.** With examples of subsidence locally in the Carrickfergus area

(Trailcock Lane and New Line Road) due to extensive salt extraction what is the likelihood if a similar occurrence in the Larne Lough area after the creation of seven significant underground chambers. This will have a negative impact on not only wildlife but also has the potential to have human cost. There will undoubtedly be an adverse effect upon property values and insurance costs.

**3. Tourism.** The peninsula of Islandmagee forms a significant part of the Causeway Coastal Route. With the recent creation of the very successful Gobbins Visitor Centre which has attracted a significant number of tourists to the area, the creation of these proposed caverns will undoubtedly have a negative impact upon the attractiveness of Islandmagee as a tourist destination. Islandmagee already has Ballylumford Power Station and the spoil from Magheramourne Quarry in Larne Lough which are a blight on the landscape. Consideration must also be given to the proposed Oil Terminal at nearby Cloughan Point which will also have the potential to negatively impact upon the environment in terms of noise, heavy vehicular traffic, and will detract from the attractiveness of the area. All these things combined will reduce an area of significant beauty to something similar to what one would see in a heavy industrialized region. Consequently there is a likelihood that investment in the Gobbins visitor centre will have been a folly and there will be a negative impact on financial input created by increased tourist footfall.

**4. Necessity.** With the aspiration to move away from fossil fuels and into other forms of sustainable energy why is the creation of Gas Storage Caverns actually necessary. No evidence of need was provided in any of the public consultation exercises. If someone can demonstrate any such evidence I would like to see it. Please consider this as a formal request for such evidence.

Regards





**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Regarding the Gas Caverns  
**Date:** 06 February 2020 20:08:40

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To whom this may concern

I attended public consultations and have spoken to your representatives which has given me a clearer understanding of this project.

I did have my concerns as to what this would do to our environment but my mind has been put to ease in knowing that experts will do everything to ensure it is all done correctly.

The prospect of new jobs being made locally can surely only mean a good thing for our local community.

I am a local resident of Islandmagee with children in the local primary school and it is great to see the funding that has been given and continues to be given to our community.

I fully support this project and look forward to seeing it progress further.

Kind regards

[REDACTED]

Sent from my iPhone

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Date:** 06 February 2020 20:16:34

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With regards to the proposal of the gas caverns in islandmagee I would like you to note that I support this as a resident. [REDACTED]  
thank you

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Gas caverns  
**Date:** 06 February 2020 20:34:02

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To whom it may concern

I recently attended the public consultation regarding the gas caverns project in Islandmagee. Firstly I would like to thank Daera who took the time to explain the processes involved.

I have lived in Ballysrudder in Islandmagee all my life and I firmly believe this project would be beneficial to not only Islandmagee but also the country in general due to the jobs creation in these uncertain times

Many thanks

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee energy.  
**Date:** 06 February 2020 20:48:09

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Dear DAERA.

As a local resident of Islandmagee I would like to tell you of my SUPPORT for the proposed project. I have seen and studied the information available and I understand there will be a small area affected which will repair itself after the brine pumping has finished. Islandmagee is in need of investment and the £1 million pounds that the company is giving would go a long way to improving the area for all its residents. I also feel that the caverns will help the UK meet its 2050 carbon reduction targets as they can store hydrogen. The creation of local jobs is definitely needed and apprenticeships for local young people a huge plus!!

I firmly believe that industry and tourism can very much live together on the island.

I understand that people have their objections but as there are NO PERMANENT negative effects for the marine life, I feel that the positives for the area and the country cannot be ignored.

Trusting that the correct decision for the future will be made by yourselves.

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** IMEL  
**Date:** 06 February 2020 21:00:35

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To whom it May Concern

I write to you with my views on the IMEL project in Islandmagee, I have worked on this project for 12 years now, I have sat in many meetings with many people, and have gained a great knowledge of the project.

I am totally sure of a number of reasons as to why this project is needed. My understanding of the need for the UK to have storage of Gas, an understanding that the salt we have here in Islandmagee is the best around to build the caverns, and with the Interconnector and Ballylumford within extreme proximity this gives an even better reason to have the storage of Gas in Islandmagee.

There are of course concerns and I appreciate that some will have concerns, but I am confident that we can trust all the experts who have worked and looked at this project over the years, and of course with the guidance and expertise of DAERA, I trust the project can be built with minimum impact to the residents of Islandmagee, I believe that the economic benefit is huge not just to Islandmagee but for many miles around. I am excited for the drawdown of the 1million pounds for our area, and the greatness that it can do for this whole area.

With the purchase of H&W, NI should be grateful to InfraStrata for their input into the NI economy, the safe guarding of jobs and the creation of many new ones. When change is not always easy but necessary, I feel it is important to think of our young people, who I call 'our tomorrow's' to protect the NI with economic growth and prosperity, and safe guard apprenticeships and full time jobs, I strongly support InfraStrata and IMEL, and ask you to consider this project with an open mind.

On closing I have lived in Islandmagee for 28.5 years, in the North end of the island for 16 years, I have brought my three children up in Islandmagee and love it here, it's my home and my place of work, I am a lucky person.

I would love to see Islandmagee prosper and I feel the IMEL project has the potential to help.

I am a strong supporter of the project.

With thanks  
[REDACTED]

**From:** [Outlook](#)  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Gas cavern project  
**Date:** 06 February 2020 21:11:21

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I strongly object to the proposed gas cavern project in Islandmagee. I think this is a horrendous idea especially with the current and ongoing issues around the World with pollution etc and not to mention the effect on wildlife. We should be trying to prevent these types of things not encouraging them. I hope this does not go ahead.

Kind regards



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas Storage Project  
**Date:** 06 February 2020 21:19:43

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To Whom it may concern,

This email outlines my support for the proposed Islandmagee gas storage project.

Having lived in Islandmagee all my life, I have strong concerns for the development, maintenance and progression of the area.

I understand, through my own research as well as the information presented at the public consultation meetings, of the necessity for continuation and guaranteed gas supply for the island of Ireland.

Economically, I understand the financial and industrial benefit to the economy, both locally and beyond, would benefit hugely from the project. Not only through the construction and maintenance, but also through the community fund which infra strata have pledged and have already put into action.

Home is where the heart is as they say, and my home holds a special place in my heart. I love Islandmagee. I want to protect Islandmagee and I want to see Islandmagee, and the people who call Islandmagee home, thrive and grow. I truly believe that this project will help to do that.

Regards,

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Gas Caverns  
**Date:** 06 February 2020 21:25:04

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I wish to express my support for the Gas Caverns Project in Islandmagee.

I am happy to see this bring so many employment opportunities to the local area which is greatly needed. It is very positive to see a company wanting to invest and give those within the local area a great opportunity.

Receiving the 1 million pound fund will greatly help the local groups and communities making a huge difference to Islandmagee and the surrounding areas.

Kind Regards

[REDACTED]



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas Storage  
**Date:** 06 February 2020 21:26:07

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To whom it may concern,

I write with regards to the Islandmagee Gas Storage project.

Having studied civil engineering, I am fully aware of the many positive aspects this project will bring, not only to the local community of Islandmagee, but also Northern Ireland.

If Northern Ireland is to thrive, there must be the infrastructure in place to support its development. Northern Ireland and the rest of the UK will be relying on fossil fuels for the next 10-20 years, so I feel that being able to protect Northern Ireland's domestic and industrial energy supply is of utmost importance.

Having studied civil engineering I am fully aware of the concerns and appreciate the need for caution. However, having read all the information presented by Infrastrata and the opinions of the many experts I believe the project can be completed in a way that protects the local ecosystems, wildlife and environment, which are fundamental to Islandmagee's beauty and charm.

In conclusion, I am a supporter of the project and hope it brings many positives to the people of Islandmagee and Northern Ireland.

Kind regards,

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee salt cavern gas storage  
**Date:** 06 February 2020 22:05:09

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To Marine Licensing Team

I am writing on behalf of Not Here Not Anywhere, concerning the consultation for the proposed gas storage facility at Islandmagee.

We have considerable concerns over this project, which are as follows.

#### A Objections in Principle

1. This project is not consistent with national plans to reduce carbon emissions in accordance with the Paris Agreement or other commitments by the UK Government. In particular it is evident that such a facility will make the use of liquefied natural gas more likely in Ireland. This gas is often obtained by fracking which has been shown to have a higher impact on greenhouse gases than many other forms of fossil fuels. This should be taken into account in the environmental impact assessment. We find no mention of it in the proposals.
2. Investment in infrastructure that supports fossil fuels is counter to national and international interest.

#### B Specific Objections

1. The majority of the submission is simply the old submission. In environmental science a period of ten or more years is a long time. The application should be supported by completely up to date research and analysis.
2. We have grave concerns about the technique to be used. Use of brine extraction in the salt fields of Cheshire has led to substantial subsidence. It is not possible to exactly direct where the salt will be dissolved or that the caverns so formed will be geologically stable. Even if the caverns are stable when pressurized they may not remain so when the structures are decommissioned. we see no provisions for insurance or compensation funds for any damage caused by possible collapse of these caverns.
3. The report by RPS is full of contingent wordings. Some examples are "The detailed design of this facility has not yet been undertaken so it is not possible to describe exactly what this will entail" (page 3), "possible design" (page 13), "preliminary basic design" (page 14), "Indicative Drilling and Casing Programme" (page 16). To list all such would take many paragraphs. No application should be considered until all vagueness has been removed. If actions are to be contingent they must be of the form "if x then y", not we haven't yet decided exactly what we are going to do..
4. Page 23 mentions several reasons why the storage facility is not going to be long lasting e.g. salt creep and gas permeation into the salt. Potential impact to the environment from these effects has not been discussed.
5. Nothing has been presented on what will happen when these caverns are abandoned.
6. RPS who prepared the report do not seem to hold themselves out as experts on

mining. It is not mentioned as an area of expertise on their web site. The person responsible for the report. [REDACTED] describes himself as "Associate Water Environment and Flood Risk Management", those do not appear to be relevant areas of expertise. The disclaimer at the start of the report contains this:-  
*RPS accepts no responsibility for any documents or information supplied to RPS by others and no legal liability arising from the use by others of opinions or data contained in this report. It is expressly stated that no independent verification of any documents or information supplied by others has been made. RPS has used reasonable skill, care and diligence in compiling this report and no warranty is provided as to the report's accuracy* (my highlighting)

We submit that this application should be rejected on both general and specific grounds and that no re-application should be permitted without thorough analysis from independent experts which is completely up to date.

regards

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Energy Marine Licence ML28\_12  
**Date:** 06 February 2020 22:13:47

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Dear Sir / Madam,

Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence. Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

Discharge of up to 1000m<sup>3</sup> of hypersaline brine per hour per day (24,000m<sup>3</sup> of toxic brine per day) for 4 years into the sea, just 450m from the shore near Castle Robin at Islandmagee, creating a benthic dead zone.

- Designated Special Area of Conservation (North Channel dSAC, directly into which the hypersaline brine will be discharged, recently designated for Harbour Porpoise)
- Special Protected Areas: Proposed East Coast (NI) Marine SPA (abstract/discharge area is within the pSPA boundary)
- Larne Lough SPA (with red flagged endangered Roseate Tern a priority species)
- Areas of Specific Scientific Interest (ASSIs: The Gobbins, Muck Isle, The Maidens)
- Only Northern Ireland land based breeding puffin colony near to discharge area
- Death of sea-life and prey species (potential impact on the food chain)
- Threat to sea birds and feeding grounds
- Concerns that protected species porpoises/otters/dolphins could be displaced

Yours faithfully,

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: Gas caverns project- Islandmagee  
**Date:** 06 February 2020 22:35:39

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[Sent from Yahoo Mail on Android](#)

I am contacting you to show I am in favour of the above project.

The project for gas storage is going to provide greatly needed employment to the area, just what is needed after the closure of large companies, causing the loss of hundreds of jobs across the province.

I think we all have concerns over the environment and the wildlife. However, having listened to the experts involved, it is clear that everything has been taken into consideration to make sure all works will be carried out correctly with minimal impact on the surrounding environment.

And finally, there is the one million pound fund being made available- this will/can be such a huge help to local schools, clubs etc within surrounding areas.

Regards

[REDACTED]

[Sent from Yahoo Mail on Android](#)

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Objection  
**Date:** 06 February 2020 22:39:26

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I would like to state my horror that infrastrata would be permitted by any northern Irish body to spoil our natural landscape of out homeland islandmagee the water table for the unique biodiversity sea creatures land and common man which surely should be prioritized over such a development.

Islandmagee is a natural resource of supreme ecological and environmental beauty and I object to everything your plans detail that will pollute damage and spoil our beautiful homeland please stop this company from damaging one of n.irelands most beautiful natural habitats

"Not until every tree has died and every fish has been poisoned will man realise that we cannot eat money"

[REDACTED]

[Sent from Yahoo Mail on Android](#)

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** No Gas Caverns  
**Date:** 06 February 2020 23:16:27

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[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Date 02/02/20

Dear Sir / Madam,

With reference to the Marine Construction Licence application 2019 Consultation ML28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable sea water abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining. I have examined the public consultation documents and I wish to strongly object to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposed project has been made available for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone which will be created in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public enquiry, as under Regulation 17 of the Water Abstraction and Impoundment Licensing Regulations (NI) 2006, the Department has the power to order a public enquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime, I wish to strongly object to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons.

I am 17 years old and I have lived on the edge of the lough all my life. I have spent all of summer holidays as baby, kid and a teenager in the waters that will be affected by the gas caverns. If the gas caverns do happen it will make me feel like I was very special to enjoy this wonderful, but I think this is completely wrong as I think that everyone should be able to enjoy this wonderful island's waters for many more years. I spent all of my childhood with my family kayaking, fishing, swimming, walking, cycling and camping on the island and I have always dreamt of doing this with my own kids someday, and to think that the gas caverns will cut nearly all of these activities out that are right on my doorstep is really sad. I have always been a massive wildlife enthusiast as well and I think this idea is completely stupid because of the effect it will have on the wildlife. In the past five years global warming has been everywhere we look and to think that something like this has been thought of in 2019/2020 is scary. So I think in this situation it is not even a thought to go ahead with the idea of having these wildlife and life destroying monsters in the ground beneath our feet. NO GAS CAVERNS. I hope this letter is read and thought about. Thanks [REDACTED]

Yours Sincerely

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Gas Caverns project at Islandmagee  
**Date:** 06 February 2020 23:30:50

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I wish to register my objections to the proposed gas caverns project at Islandmagee.

Having read the documentation. I object on several grounds

- 1) Seven years of construction is going to have severe impacts on wildlife before the facility is even operational. Most concerning will be the detrimental impacts on the harbour porpoise (a UK priority species) and on the local bird colonies, including some of the last remaining breeding roseate terns in the region! Terns are sensitive to noise. There is no way that years of construction will not have an impact on these breeding colonies.
- 2) This site/s is within and surrounded by protected areas. Including the North Channel SAC, Maidens SAC and 3 ASSIs. If we can't protect our 'designated protected areas' what can we actually protect?!
- 3) The benthic impact. A kill zone of brine entering the channel is not acceptable. Just because it enters the water at 27m does not mean it will stay there. The impacts of this on benthic marine life are vastly underestimated.

There are just a few of the MANY reasons that this project is completely unacceptable. Please do the right thing and put the wildlife and marine life of Northern Ireland first.

Kind Regards,

[REDACTED]

Sent from my Samsung Galaxy smartphone.



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Date:** 07 February 2020 07:18:21

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Dear Sir / Madam,

Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

The fear of the ground collapsing or worse, we work extremely hard as a family and have a home where we enjoy the wildlife that surrounds us to have that threat of danger is not acceptable for us or our wildlife. The danger and destruction to our seas is also just not acceptable we swim, kayak, walk in our beautiful area to have our sea life under threat again is something that should never happen. As a community we will never accept this destruction.

Thank you  
Kind regards

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas storage ML28\_12  
**Date:** 07 February 2020 09:11:07  
**Attachments:** [image001.png](#)

---

Good morning,

Why has there been no communication from the Dept that this consultation period has been extended to 23<sup>rd</sup> March?...

If this is a request from [REDACTED] simply based on the feedback he has had from various organisations that have made their objections public then I would take a very dim view if that was the case. There is no mention of the change on your website and when was this agreed and shared?

People have worked tirelessly to ensure they hit the deadline.

Kindest Regards

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Gas Caverns  
**Date:** 07 February 2020 09:24:48

---

I'm emailing as a resident of Islandmagee to show my support of the gas Caverns project and the jobs it will bring for the community

Get [Outlook for Android](#)

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** No Gas Caverns Larne Lough  
**Date:** 07 February 2020 09:37:43

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Date 02/02/20

Dear Sir / Madam,

With reference to the Marine Construction Licence application 2019 Consultation ML28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable sea water abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining. I have examined the public consultation documents and I wish to strongly object to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposed project has been made available for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone which will be created in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public enquiry, as under Regulation 17 of the Water Abstraction and Impoundment Licensing Regulations (NI) 2006, the Department has the power to order a public enquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime, I wish to strongly object to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons.

In summary some of the main issues are

**MARINE & BIRD LIFE** Discharging huge volumes of super saturated brine into an ASSI (Area of Special Scientific Interest) dSAC (designated Special Area of Conservation) to protect the Harbour Porpoise and pSPA (Special Protection Area) close to Musk Island Nature Reserve. The Gobbins has the only NI mainland breeding colony of Puffins.

**SAFETY** The safety of the caverns themselves now and in the long term, these caverns once created will be there forever. Initially they will be used to store natural gas but could be used in future to store hydrogen or potentially even nuclear waste.

**TOURISM** The negative affect on tourism, especially since so much has been invested in the Gobbins Cliff Walk, the most visited tourist attraction in NI last year. With such a wonderful coastline and wildlife it is ridiculous to jeopardise the growing local tourist industry (which also creates many local jobs) to facilitate a completely unnecessary gas storage project which will not create any local jobs or benefit at all (specialised external contractors will be involved in most of the construction). The only people to get rich from this are the Directors of Infrastrata and Islandmagee Energy (Tweed Fuels) and the shareholders who do not have to live with the consequences.

**LACK OF NEED** No evidence of need for the gas storage project was provided in the public consultation documents. Please request a statement of need. This gas storage project is a decade too late, the project was kicked of the EU PCI (Projects of Common Interest) list last year as the benefits were not deemed to out weight the costs involved. We already have a secure supply of gas in NI, the gas storage is for the rest of the UK and will require the reversal of the SNIP to send the gas back from where it came from. The NI consumer may be forced to pay for the SNIP reversal, which would require a public enquiry. We should be investing in renewable energy projects, no fossil fuel projects should even be considered for development in 2020.

Yours Sincerely

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Objection  
**Date:** 07 February 2020 10:17:55

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07 February 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by IslandmageeEnergy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

The impact on the environment would be disastrous, this is a protected area for a reason, big companies wanting to make money have no care for the environment or local people or wildlife.

The people of Northern Ireland have not been properly consulted and do not want this.

I believe it will destroy a beautiful area, in this day and age when environmental issues are of great importance, and in the fore front of the news I am in disbelief that such a company would even consider this.

I would greatly appreciate that my views are considered and taken into account.

Regards



A Northern Irish resident.

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Fwd: Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12  
**Date:** 07 February 2020 11:31:13

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7th February 2020

Dear Sir / Madam,

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

### **MARINE/NATURAL WORLD**

- Discharge of up to 1000m<sup>3</sup> of hypersaline brine per hour per day (24,000m<sup>3</sup> of toxic brine per day) for 4 years into the sea, just 450m from the shore near Castle Robin at Islandmagee, creating a benthic dead zone.
- Designated Special Area of Conservation (North Channel dSAC, directly into which the hypersaline brine will be discharged, recently designated for Harbour Porpoise)
- Special Protected Areas: Proposed East Coast (NI) Marine SPA (abstract/discharge area is within the pSPA boundary)
- Larne Lough SPA (with red flagged endangered Roseate Tern a



priority species)

- Areas of Specific Scientific Interest (ASSIs: The Gobbins, Muck Isle, The Maidens)
- Only Northern Ireland land based breeding puffin colony near to discharge area
- Death of sea-life and prey species (potential impact on the food chain)
- Threat to sea birds and feeding grounds
- Concerns that protected species porpoises/otters/dolphins could be displaced

### **AFFECT ON PEOPLE**

- Potential impact on leisure pursuits  
fishing/diving/swimming/boating
- Potential negative impact on tourism / Gobbins Project
- Potential impact on local industry, fishermen, lobster fishermen

### **LACK OF NEED**

- Only a "skeleton staff" required to operate facilities after construction according to the public consultation documents.
- No evidence of need for the gas storage provided in the public consultation documents

### **CAVERN CONCERNS**

- Serious concerns over cavern safety, now and the long term.
- Deemed a high risk project by Northern Ireland Health and Safety Executive.
- How any licences facilitating the gas storage project will affect your peace of mind and well being.

As a resident in the immediate vicinity of the proposed project, I can not stress enough how strongly I am opposed to this.

Regards



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Objection  
**Date:** 07 February 2020 12:29:27

---

Dear Sir / Madam,

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

### **MARINE/NATURAL WORLD**

- Discharge of up to 1000m<sup>3</sup> of hypersaline brine per hour per day (24,000m<sup>3</sup> of toxic brine per day) for 4 years into the sea, just 450m from the shore near Castle Robin at Islandmagee, creating a benthic dead zone.
- Designated Special Area of Conservation (North Channel dSAC, directly into which the hypersaline brine will be discharged, recently designated for Harbour Porpoise)
- Special Protected Areas: Proposed East Coast (NI) Marine SPA (abstract/discharge area is within the pSPA boundary)
- Larne Lough SPA (with red flagged endangered Roseate Tern a priority species)
- Areas of Specific Scientific Interest (ASSIs: The Gobbins, Muck Isle, The Maidens)
- Only Northern Ireland land based breeding puffin colony near to discharge area
- Death of sea-life and prey species (potential impact on the food chain)
- Threat to sea birds and feeding grounds
- Concerns that protected species porpoises/otters/dolphins could be displaced

### **AFFECT ON PEOPLE**

- Potential impact on leisure pursuits fishing/diving/swimming/boating
- Potential negative impact on tourism / Gobbins Project
- Potential impact on local industry, fishermen, lobster fishermen

### **LACK OF NEED**

- Only a "skeleton staff" required to operate facilities after construction according

to the public consultation documents.

- No evidence of need for the gas storage provided in the public consultation documents

**CAVERN CONCERNS**

- Serious concerns over cavern safety, now and the long term.

- Deemed a high risk project by Northern Ireland Health and Safety Executive.

- How any licences facilitating the gas storage project will affect your peace of mind and well being.

As a resident in the immediate vicinity of the proposed project, I can not stress enough how strongly I am opposed to this.

Regards

[Redacted]

[Redacted]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Gas caverns  
**Date:** 07 February 2020 13:16:28

---

Dear Sir/madam,

I wish to join the many people already objecting to the installation of gas cavern in Islandmagee.

My concern is the consequences that the accompanying pollution may cause to the natural environment.

Pease take this email as my objection to the proposed project.

Yours sincerely

[REDACTED]

[Sent from Yahoo Mail for iPhone](#)

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas Caverns  
**Date:** 07 February 2020 13:28:15

---

As a lifelong resident of islandmagee, I have no objections to the proposed gas caverns and would welcome the job opportunities for local people.

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** FW: Islandmagee Energy Limited - ML 28\_12  
**Date:** 07 February 2020 13:48:02

---

I refer to previous correspondence concerning the Public Consultation and note this morning that Infrastrata have released a statement advising that they have decided to extend the PC to March (link attached).

"We are delighted with the positive response that we have received during the consultation process. In order to accommodate further requests to attend and learn more about the Project, we have decided to extend the process. We remain confident that the marine license will be issued following due process. The extensive scientific work undertaken on the project clearly indicates that the project will comply with the regulatory framework that is currently in place."

As I'm sure I do not need to point out, this form of notification is extremely concerning, not least because no notice of such a decision has been published on your website.

Kindly address this point as a matter of urgency.

Regards,

[REDACTED]

<https://polaris.brighterir.com/public/infrastrata/news/rns/story/x5lz38r/export>

---

**From:** [REDACTED]  
**Sent:** 04 February 2020 22:46  
**To:** DAERA Marine Licensing Team <[REDACTED]>  
**Subject:** Islandmagee Energy Limited - ML 28\_12

I refer to my letter of objection dated 3<sup>rd</sup> February 2019 regarding the above application and would be grateful if you could clarify the following points which, whilst integral to my objection and should be treated as such, require a more urgent response in order that I may further assess the application:-

As I have stated in my objection letter and mentioned to [REDACTED] at one of the Information Sessions attended by DAERA, it is extremely difficult to ascertain what environmental information is still relevant and which documents have been partly, or wholly, updated. Please therefore clarify which parts of the Environmental Statements have been superceded and/or amended. Please provide "marked-up" versions of the documents so I may fully understand what updates have been completed. Alternatively, a list or table specifying what deletions or amendments have been done would suffice.

As I understand the project to be deemed "high risk" requiring the input of Health & Safety

Executive NI and Geological Survey of NI, please provide copies of their consultation responses.

Please advise where I can locate a full set of detailed, to-scale drawings of what is proposed by the applicant, including detailed to-scale drawing showing precise location of where the caverns are proposed to be sited (ref: Page 16 of RPS' Report in 2019 Updated Application).

I look forward to hearing from you as soon as possible.

Regards,

A solid black rectangular redaction box covering the signature area.

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Gas Caverns Islandmagee  
**Date:** 07 February 2020 14:44:27

---

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

**MARINE/NATURAL WORLD**

- Discharge of up to 1000m<sup>3</sup> of hypersaline brine per hour per day (24,000m<sup>3</sup> of toxic brine per day) for 4 years into the sea, just 450m from the shore near Castle Robin at Islandmagee, creating a benthic dead zone.
- Designated Special Area of Conservation (North Channel dSAC, directly into which the hypersaline brine will be discharged, recently designated for Harbour Porpoise)
- Special Protected Areas: Proposed East Coast (NI) Marine SPA (abstract/discharge area is within the pSPA boundary)
- Larne Lough SPA (with red flagged endangered Roseate Tern a priority species)
- Areas of Specific Scientific Interest (ASSIs: The Gobbins, Muck Isle, The Maidens)
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- Death of sea-life and prey species (potential impact on the food chain)
- Threat to sea birds and feeding grounds
- Concerns that protected species porpoises/otters/dolphins could be displaced

**AFFECT ON PEOPLE**

- Potential impact on leisure pursuits fishing/diving/swimming/boating
- Potential negative impact on tourism / Gobbins Project
- Potential impact on local industry, fishermen, lobster fishermen

**LACK OF NEED**



- Only a “skeleton staff” required to operate facilities after construction according to the public consultation documents.
- No evidence of need for the gas storage provided in the public consultation documents

**CAVERN CONCERNS**

- Serious concerns over cavern safety, now and the long term.
- Deemed a high risk project by Northern Ireland Health and Safety Executive.
- How any licences facilitating the gas storage project will affect your peace of mind and well being.

Regards

[Redacted signature block]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: Marine Construction Licence application 2019 Consultation ML28\_12 by Islandmagee Energy /  
Infrastrata- OBJECTION  
**Date:** 07 February 2020 16:00:58

---

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

Dear Sir / Madam,

With reference to the Marine Construction Licence application 2019 Consultation ML28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable sea water abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining.

I have examined the public consultation documents and I wish to **strongly object** to the project and the Marine Construction Licence.

Firstly, no evidence of strategic need for the proposed project has been made available for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone which will be created in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public enquiry, as under Regulation 17 of the Water Abstraction and Impoundment Licensing Regulations (NI) 2006, the Department has the power to order a public enquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime, I wish to strongly object to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

1.

World leaders are tasked with addressing the damage we are causing to our oceans. Environmentalists are citing evidence that the world is nearer the brink of environmental disaster than ever before. The NI Assembly has declared a climate emergency. It has backed the creation of an independent Environmental Protection Agency within the year, to protect the environment. We, as citizens of the world are striving individually to reuse plastics and reduce our waste going to landfill to save the environment and the oceans. Against this background, how could DAERA justify approving a marine licence to enable this gas cavern project to proceed? This project has no strategic need, is associated with storage of fossil fuel, the methodology being employed will cause ongoing catastrophic damage to the local environment for years to come. Northern Ireland Marine Task Force, which includes highly respected and credible conservation groups including RSPB NI, Friends of the Earth, National Trust, WWF, Marine Conservation Society have all unreservedly stated their opposition to this licence being approved. They have stated that the information submitted in support of this project is out of date and the need for the project is

questionable given the climate concerns and commitments to restrict the use of fossil fuels.

2.

#### MARINE & BIRD LIFE

A project which is applying for a licence to discharge huge volumes of super saturated brine into an ASSI (Area of Special Scientific Interest), dSAC (designated Special Area of Conservation) to protect the Harbour Porpoise and pSPA (Special Protection Area) close to Musk Island Nature Reserve beggers belief. The Northern Ireland Marine Task Force (experts in their particular fields of expertise) have raised concerns about the detrimental effect of construction noise on local wildlife and the impact this project will have both on fish and foraging birds.

It is my belief that submitting this licence application makes a mockery of why these protection areas were set up in the first place. What is the point of setting up Conservation areas if licences are then approved which wilfully cause damage to these areas and their wildlife?

The Gobbins has the only NI mainland breeding colony of Puffins! When the brine kills the sand eels, the puffins will have nothing to feed on and will be lost too.

3.

#### SAFETY

The safety of the caverns themselves now and in the long term, these caverns once created will be there forever. Each cavern project is untested by virtue of the fact that each site has its own characteristics in terms of rock structure and terrain. I live close to the proposed project and am worried about the safety of the development of this project. Initially they will be used to store natural gas but could be used in future to store hydrogen or potentially even nuclear waste. The company wishes to rent out these caverns as storage facilities to other companies. They make decisions based on potential income for their shareholders. If there is a higher return available for the storage of hazardous material then there is the risk that they will opt for this premium income stream.

4.

#### TOURISM

The negative effect on tourism, especially since huge amounts have already been invested in the Gobbins Cliff Walk, the most visited tourist attraction in NI last year!

With such a diverse coastline and wildlife, I do not believe that it is justifiable to jeopardise our growing local tourist industry which creates many local jobs (Northern Ireland is only now beginning to see tourism growth after years of stagnant tourism numbers being a legacy of the Northern Ireland Troubles) to facilitate a **completely unnecessary gas storage project** which will not create any local jobs or benefit at all (specialised external contractors will be involved in most of the construction).

The only people to get rich from this are the Directors of Infrastrata and Islandmagee Energy (Tweed Fuels) and their shareholders who either do not care, or do not have to live with the consequences.

5.

#### CARBON FOOTPRINT

Has there been an assessment on the Carbon Footprint of this proposal with lorries in convoys travelling our country roads 24/7? The emissions from these lorries and fossil fuel usage will be huge...and completely unnecessary. How does this cost to the environment fit within the NI Assembly's need to protect the environment.

6

#### LACK OF NEED

This is the crux of the matter!

Absolutely **no evidence of need** for the gas storage project was provided in the public consultation documents.

**Please request a statement of need.**

This gas storage project is a decade too late, the project was kicked of the EU PCI (Projects of Common Interest) list last year as the benefits were not deemed to out weigh the costs involved. We already have a secure supply of gas in NI, the gas storage is for the rest of the UK and will require the reversal of the SNIP to send the gas back from where it came from.

The NI consumer may be forced to pay for the SNIP reversal, which would require a public enquiry.

We should be investing in renewable energy projects, no fossil fuel projects should even be considered for development in 2020!!!

7.

#### Northern Irelands Reputation

Northern Ireland is still reeling from the environmental scandal of RHI scheme, a 'get rich quick' project for a select few unscrupulous people who were happy to heat the atmosphere (country barns with windows wide open to release heat) to enhance their personal profits.

This project cannot be allowed to become another opportunity for Northern Ireland to be shamed in the world stage by approving an environmental disaster with untold repercussions for wildlife, with the only possible benefit derived being profit for the commercial company which sponsored the project and its shareholders.

Please acknowledge receipt of my letter of Opposition to the granting of this licence.



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Energy Marine Licence Consultation ML 28\_12  
**Date:** 07 February 2020 16:16:20

---

Dear Sir/Madam

With reference to the Marine Construction Licence application 2019 ML 28\_12 by Islandmagee Energy/ Infrastrata for the purpose to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

I am very concerned for the effect this will have on the wildlife in the surrounding area. The sea life will be seriously affected. I believe then that the seabirds and the whole food chain will be seriously damaged. I believe we should not be even thinking of project such as this when there has been a general consensus that we should be trying to protect the environment.

This proposed project flies in the face of the investment recently in tourism in the area for example the Gobbins cliff path and Black head path. The local council, the Ulster Wildlife Trust, the National Trust and I am sure the Tourist Board have all been working hard and investing in the area and this proposal by Islandmagee Energy /Infrastrata has the potential to undermine all of this good work and destroy the beautiful area that is Islandmagee.

I have read recently that the government is planning to do away with gas central heating in the future and plans to invest in greener energy such as wind and solar power. Why would we wish to destroy the area for a relatively short term usage. The legacy of the massive caverns under Larne Lough would worry me for future generations.

I also believe that there are serious health and safety issues both by the increased heavy traffic during the Construction period and also with the inherent danger of gas under high pressure. I would also be concerned about possible seismic activities and the subsequent failure of the integrity of the caverns.

As a member of the public with serious concerns, I object strongly to the issue of a Marine Construction Licence as if granted I believe will destroy this area where many people live and many people visit to enjoy the beautiful surroundings.

Please do not issue this Marine Construction Licence unless you are 100% certain it will have no adverse effects or no chance of damaging the environment for many years to come.

Yours Faithfully,

[REDACTED]

Sent from Samsung tablet

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas Storage Project Consultation  
**Date:** 07 February 2020 16:24:47

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Dear Sir,

We are writing to you to put forward our objections to the proposed Islandmagee Gas Storage Project.

1 We believe that the Non-technical Summary provided by Islandmagee Energy Limited is inaccurate in respect of the current and proposed list of protected or designated marine areas. We would urge rejection of any proposal from an organisation that does not provide accurate information for the consultation process.

2 We recently contributed to the consultation on the Environment Strategy for Northern Ireland. We note that the Northern Ireland Marine Plan and the Northern Ireland Energy Strategy are currently also being discussed and developed. It is clearly a misjudgement to proceed with the proposed development until it can be considered within the framework of those documents, as there can be no assurance that agreed standards are being used to protect both the public interest and the environment.

3 The Non-Technical Summary document asserts that *“Construction activities will generate temporary employment for over 200 people, and operation of the facility will provide permanent employment for more than 20 people (Islandmagee Storage Limited is committed to using local labour where possible).”* It is obvious that Islandmagee Energy Ltd will not employ 200 workers for the entire construction phase of the project, and therefore the figures for temporary job creation have little meaning unless expressed as full-time equivalent posts during the construction period. In addition, the ‘commitment’ to appointing local workers may have little meaning in terms of the skills required and their availability within the local workforce, and of the Fair Employment legislation that may be in force at the time. The same considerations apply to permanent employment. While the creation of employment opportunities is a benefit, we would urge the Department not to accept these figures as they are presented.

4 It is clear that the project will have a significant impact on a large number of protected or designated areas, and the species that live or forage in them. As members of the public who rely on Government Departments to place a high priority on the protection of the environment, we have to ask what the point of protection is if the

proposed development is allowed to proceed.

Yours sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12  
**Date:** 07 February 2020 16:42:42

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Email: [REDACTED]

7 February 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

- Discharge of up to 1000m<sup>3</sup> of hypersaline brine per hour per day (24,000m<sup>3</sup> of toxic brine per day) for 4 years into the sea, just 450m from the shore near Castle Robin at Islandmagee, creating a benthic dead zone.
- The area is a designated Special Area of Conservation (North Channel dSAC, directly into which the hypersaline brine will be discharged) and has recently been designated for Harbour Porpoise
- The area for development falls within Special Protected Areas: Proposed East Coast (NI) Marine SPA ( and the abstract/discharge area is within the pSPA boundary)
- Larne Lough falls within an SPA; is an Area of Special Scientific Interest and a RAMSAR site qualifying under Criterion 3c of the Ramsar Convention by regularly supporting internationally important numbers of light-bellied Brent geese in winter and under Criterion 2a by supporting an important number of vulnerable and endangered Irish Red Data Book bird species including the red flagged endangered Roseate Tern a priority species.
- Other Areas of Specific Scientific Interest lie nearby or adjacent to the proposed development site or its outflow (ASSIs: The Gobbins, Muck Isle, The Maidens)
- The Gobbins cliffs host Northern Ireland's only land based breeding puffin colony close to the discharge area



- The impact of the death of all sea-life and prey species will adversely impact the food chain for all marine species in the area including sea birds which use the areas for their feeding grounds
- Concerns that protected species porpoises/otters/dolphins could be displaced
- The adverse effect on local people and visitors in terms of swimming/watersports is unknown and of great concern to me
- The impact on local fishermen is also of great concern.
- The project will not create long term jobs as only a "skeleton staff" will be required to operate facilities after construction according to the public consultation documents.
- I have serious concerns over cavern safety, now and the long term and I consider it a risk that the caverns may be used for alternative unsafe storage means in the future. The project has already been identified as high risk by Northern Ireland Health and Safety Executive.

Yours sincerely



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Objection to a Marine Construction Licence  
**Date:** 07 February 2020 16:43:02

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7 February 2020

Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Dear Sir / Madam,

Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12

by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by Solution Mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine

Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I

believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour

Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry,

as Under Regulation 17 of the Water Abstraction and Impoundment (Licensing) Regulations

(Northern Ireland) 2006, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as

per the Public Consultation for the following reasons:

Further to my recent appointment on the 4 February 2020 to view the public consultation documents I have some concerns. I was unable to find plans for the intake pumping station at Bells Port Dundressan. I assumed this would be a part of the marine licence application, after all it is where the salt water is extracted from the sea. The member of staff thought the plans were part of the previous terrestrial planning application, but when I asked for the original plans I was advised they were not available at DAERA, only at the planning office. This concerns me, how can I review the proposal in relation to the original plans & drawings if they are not available to view for the public consultation? Surely the project should be seen as a whole unit not isolated parts. The only reference to the intake pump station I could find was a grid set in a photomontage of Bells Port, (Marine construction licence Application F02 16/12/2019) 3.3.1.2 “Sea water Intake Design” page 8, Figure 3-1,

I also noted in the application 3.4.2 “Trajectories of Cavern Wells” page 16, the last sentence, *the caverns may even be located under the land rather than under the lough*, but was unable to find a detailed scale drawing of the new cavern locations. I was advised that the public consultation was about the marine license application but the caverns are mentioned by DAERA as being part of this, I also was unable to find any comments from HSENI or from GSNI in the public consultation documents.

The discharge of such large quantities of brine into the North Channel is bound to affect the marine environment. Islandmagee Energy Ltd. themselves admit there will be a kill zone around the outfall. The human race has been slow to learn that quite small changes can have a big influence on the natural world, consider the devastating effect a 1 degree rise in temperature is having on the ice caps, glaciers and oceans of the world. It is very possible this brine discharge will have unforeseen consequences in our inshore waters. There are studies relating to the destruction of marine life in waters near desalination plants and they all indicate some degradation in marine life.

I have a concern about the concentration of the brine at the outfall towards the end of the flood and ebb tide. When we consider the twelfths rule for the rise and fall of the tide the flow rate / volume of water slows to 1/12<sup>th</sup> of the tidal height for that day for 1 hour before and after high and low water.

This means that during the last hour of the incoming tide of say 2 knots, which it must be remembered is slowing to no flow at slack water, brine will be pumped into the sea at a rate of approximately 1,000 cu.mts. Per. hour. The concentration of the pumped brine will be defusing into a slower moving body of water than it would be at half tide, when three times the volume of sea water will pass over the outfall per hour.

At dead low water the tidal flow will stop and that same water which has moved the 2 nautical miles south down the coast to Muck Island will now start to flow north over the same brine outfall and get a second dose of concentrated brine and this will happen to a lesser extent for the next 2 hours. Then at half tide the concentrations will again increase until low tide when the whole cycle will be repeated, with the tide turning four times a day, the area will never be flushed clean. Accepted the tide does not just go up and down the coast but even so over a three year or longer period the salinity of the North Channel will rise, maybe not by much but as we are coming to learn small changes in the environment caused by man can have an irreversible effect on nature, for example the killing zone could be larger than stated and we will never know when we pass the tipping point, when we cannot undo the damage we have done to nature.

A realistic impression of what will truly happen at the ebb and flow of every tide can be seen in the RPS brine dispersion report figure 5-6 “Maximum sea bed salinity neap-spring tidal cycle -1000cubic meters /hour discharge” here it can be seen how the already contaminated water will again and again pass over the outfall. It doesn't need a computer to work this out.

IT must be remembered most of the data that has been forwarded by Infrastrata is computer modelling which is only as good as the input information and real life is very

different to a computer model, nature won't necessarily conform to a computer. This could well have an impact on the food chain within this sea area, where we have a Designated Area of Conservation for the Harbour Porpoise.

Areas of Specific Interest, the Maidens Rocks, Muck Island the Gobbins Cliffs and a Special Protected Area within Larne lough, Blue Circle Island where the endangered Roseate Tern nests.

Mid and East Antrim council have spent a very large amount of money promoting tourism in the coastal area, Carrickfergus, Whitehead, Gobbins, Carnfunnock and it would be a real shame to see this enterprise fail as a result of this dubious industrial venture.

Very few people have walked the rocky shore line from Portmuck to Browns Bay at low tide. It is a lovely part of the coast it is still unspoilt there is little evidence of man's influence other than a few stone walls and a fence along the cliff top. It is possible to walk this except in two places where the sea meets cliffs. An industrial intake building no matter how well disguised would be out of place on the shore at Bells Port. In the summer months in good weather many people launch small trailer boats at Portmuck or Ballylumford and fish along this stretch of coast it would be a pity if the marine life moved away because of the brine.

In light of the government's aim under their renewable energy and climate commitments to phase out the burning of fossil fuels, including natural gas by 2030 and be carbon neutral by 2050 and their intention to have no new housing fitted with gas fired heating after 2025, these factors reduce the need for the provision of more gas storage. A recent house of Commons Business Energy Industrial Committee report states that the U.K. gas supply is robust, even with the closure of the Rough storage plant. The existing gas pipeline from Moffat in Scotland to Northern Ireland is a one way system so gas stored in N.I. cannot go back to the mainland.

The concentration of these gas caverns alongside two gas fired power stations, a gas interconnection, an electricity interconnector and a vital part of the high tension electricity grid system, all within a kilometre, increases the risk of an accident or terrorism at these main sources of power in N.I. a real security issue which never appears to be considered.

I also have real concerns about the safety of the gas storage, only 5% to 15% of natural gas in air can cause an explosion. Even with the best laid plans and in the safest places accidents can and do happen and things go wrong and there will be a vast quantity of flammable gas stored in these caverns with the potential to do real harm to local people, the environment and the electrical power infrastructure of Northern Ireland. Is there an emergency evacuation plan for north Islandmagee, if one exists has anyone seen it? I've never heard anyone mentioned such a plan. What are Infrastrata's plans and procedures in the event of an accident?

Northern Ireland should take every opportunity to be the world leader in renewable energy and not get involved in storing a volatile fossil fuel that will soon become redundant. We can no longer allow a few people so get rich at the expense of future generations.

Infrastrata are not proposing this project as an entirely altruistic act, few local people will be employed, the gas pipeline bypasses Islandmagee and those who use gas in N.I. will pay more because there will be a cost for storing the gas and it will be sold to the highest bidder. They are out to make money and will ask for every grant possible at the taxpayers' expense.

Apart from the above, the environmental impact to our inshore waters should be very seriously considered especially with the knowledge we now have regarding global warming.

As Jacques Cousteau said the waters in the oceans of the earth are the same waters there were at the formation of the earth, we won't get any more so we have to look after them.

Yours faithfully



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#); [REDACTED]  
**Subject:** Islandmagee Energy Marine Licence Consultation ML 28\_12  
**Date:** 07 February 2020 16:48:38

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Objection Letter from [REDACTED] below.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Email: [REDACTED]

7 February 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

- Discharge of up to 1000m<sup>3</sup> of hypersaline brine per hour per day (24,000m<sup>3</sup> of toxic brine per day) for 4 years into the sea, just 450m from the shore near Castle Robin at Islandmagee, creating a benthic dead zone.
- The area is a designated Special Area of Conservation (North Channel dSAC, directly into which the hypersaline brine will be discharged) and has recently been designated for Harbour Porpoise
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- Other Areas of Specific Scientific Interest lie nearby or adjacent to the proposed development site or its outflow (ASSIs: The Gobbins, Muck Isle, The Maidens)
- The Gobbins cliffs host Northern Ireland's only land based breeding puffin colony close to the discharge area
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- I have serious concerns over cavern safety, now and the long term and I consider it a risk that the caverns may be used for alternative unsafe storage means in the future. The project has already been identified as high risk by Northern Ireland Health and Safety Executive.

Yours sincerely

██████████

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#); [REDACTED]  
**Subject:** Islandmagee Energy Marine Licence Consultation ML 28\_12  
**Date:** 07 February 2020 16:49:53

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Objection letter from [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Email: [REDACTED]  
7 February 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

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- I have serious concerns over cavern safety, now and the long term and I consider it a risk that the caverns may be used for alternative unsafe storage means in the future. The project has already been identified as high risk by Northern Ireland Health and Safety Executive.

Yours sincerely



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#); [REDACTED]  
**Subject:** Islandmagee Energy Marine Licence Consultation ML 28\_12  
**Date:** 07 February 2020 16:50:44

---

Objection letter from [REDACTED]

Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Email: [REDACTED]

7 February 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

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In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

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brine per day) for 4 years into the sea, just 450m from the shore near Castle Robin at Islandmagee, creating a benthic dead zone.

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Yours sincerely



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#); [REDACTED]  
**Subject:** Islandmagee Energy Marine Licence Consultation ML 28\_12  
**Date:** 07 February 2020 16:52:12

---

Objection letter from [REDACTED]

Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Email: [REDACTED]  
7 February 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

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**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#); [REDACTED]  
**Subject:** Islandmagee Energy Marine Licence Consultation ML 28\_12  
**Date:** 07 February 2020 16:54:31

---

Objection letter from [REDACTED]

Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Email: [REDACTED]  
7 February 2020

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**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

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- The area is a designated Special Area of Conservation (North Channel dSAC, directly into which the hypersaline brine will be discharged) and has recently been designated for Harbour Porpoise

- The area for development falls within Special Protected Areas: Proposed East Coast (NI) Marine SPA ( and the abstract/discharge area is within the pSPA boundary)
- Larne Lough falls within an SPA; is an Area of Special Scientific Interest and a RAMSAR site qualifying under Criterion 3c of the Ramsar Convention by regularly supporting internationally important numbers of light-bellied Brent geese in winter and under Criterion 2a by supporting an important number of vulnerable and endangered Irish Red Data Book bird species including the red flagged endangered Roseate Tern a priority species.
- Other Areas of Specific Scientific Interest lie nearby or adjacent to the proposed development site or its outflow (ASSIs: The Gobbins, Muck Isle, The Maidens)
- The Gobbins cliffs host Northern Ireland's only land based breeding puffin colony close to the discharge area
- The impact of the death of all sea-life and prey species will adversely impact the food chain for all marine species in the area including sea birds which use the areas for their feeding grounds
- Concerns that protected species porpoises/otters/dolphins could be displaced
- The adverse effect on local people and visitors in terms of swimming/watersports is unknown and of great concern to me
- The impact on local fishermen is also of great concern.
- The project will not create long term jobs as only a "skeleton staff" will be required to operate facilities after construction according to the public consultation documents.
- I have serious concerns over cavern safety, now and the long term and I consider it a risk that the caverns may be used for alternative unsafe storage means in the future. The project has already been identified as high risk by Northern Ireland Health and Safety Executive.

Yours sincerely

██████████

**From:** [REDACTED]  
**To:** [REDACTED] [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Energy Marine Licence Consultation ML 28\_12  
**Date:** 07 February 2020 16:55:57

---

objection letter from [REDACTED]

Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Email: [REDACTED]

7 February 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

- Discharge of up to 1000m<sup>3</sup> of hypersaline brine per hour per day (24,000m<sup>3</sup> of toxic brine per day) for 4 years into the sea, just 450m from the shore near Castle Robin at Islandmagee, creating a benthic dead zone.
- The area is a designated Special Area of Conservation (North Channel dSAC, directly into which the hypersaline brine will be discharged) and has recently been designated for Harbour Porpoise
- The area for development falls within Special Protected Areas: Proposed East Coast



(NI) Marine SPA ( and the abstract/discharge area is within the pSPA boundary)

- Larne Lough falls within an SPA; is an Area of Special Scientific Interest and a RAMSAR site qualifying under Criterion 3c of the Ramsar Convention by regularly supporting internationally important numbers of light-bellied Brent geese in winter and under Criterion 2a by supporting an important number of vulnerable and endangered Irish Red Data Book bird species including the red flagged endangered Roseate Tern a priority species.
- Other Areas of Specific Scientific Interest lie nearby or adjacent to the proposed development site or its outflow (ASSIs: The Gobbins, Muck Isle, The Maidens)
- The Gobbins cliffs host Northern Ireland's only land based breeding puffin colony close to the discharge area
- The impact of the death of all sea-life and prey species will adversely impact the food chain for all marine species in the area including sea birds which use the areas for their feeding grounds
- Concerns that protected species porpoises/otters/dolphins could be displaced
- The adverse effect on local people and visitors in terms of swimming/watersports is unknown and of great concern to me
- The impact on local fishermen is also of great concern.
- The project will not create long term jobs as only a "skeleton staff" will be required to operate facilities after construction according to the public consultation documents.
- I have serious concerns over cavern safety, now and the long term and I consider it a risk that the caverns may be used for alternative unsafe storage means in the future. The project has already been identified as high risk by Northern Ireland Health and Safety Executive.

Yours sincerely

██████████

**From:** [REDACTED]  
**To:** [REDACTED] [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Energy Marine Licence Consultation ML 28\_12  
**Date:** 07 February 2020 16:57:02

---

Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Email: [REDACTED]  
7 February 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

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- The area is a designated Special Area of Conservation (North Channel dSAC, directly into which the hypersaline brine will be discharged) and has recently been designated for Harbour Porpoise
- The area for development falls within Special Protected Areas: Proposed East Coast (NI) Marine SPA ( and the abstract/discharge area is within the pSPA boundary)
- Larne Lough falls within an SPA; is an Area of Special Scientific Interest and a

RAMSAR site qualifying under Criterion 3c of the Ramsar Convention by regularly supporting internationally important numbers of light-bellied Brent geese in winter and under Criterion 2a by supporting an important number of vulnerable and endangered Irish Red Data Book bird species including the red flagged endangered Roseate Tern a priority species.

- Other Areas of Specific Scientific Interest lie nearby or adjacent to the proposed development site or its outflow (ASSIs: The Gobbins, Muck Isle, The Maidens)
- The Gobbins cliffs host Northern Ireland's only land based breeding puffin colony close to the discharge area
- The impact of the death of all sea-life and prey species will adversely impact the food chain for all marine species in the area including sea birds which use the areas for their feeding grounds
- Concerns that protected species porpoises/otters/dolphins could be displaced
- The adverse effect on local people and visitors in terms of swimming/watersports is unknown and of great concern to me
- The impact on local fishermen is also of great concern.
- The project will not create long term jobs as only a "skeleton staff" will be required to operate facilities after construction according to the public consultation documents.
- I have serious concerns over cavern safety, now and the long term and I consider it a risk that the caverns may be used for alternative unsafe storage means in the future. The project has already been identified as high risk by Northern Ireland Health and Safety Executive.

Yours sincerely

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

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Objection to Islandmagee Energy / Infrastrata Marine Construction Licence Application  
**Date:** 07 February 2020 16:57:13

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**Ref: Public Consultation re Islandmagee Energy Marine Construction Licence ML 28\_12**

Please quote the above marine licence number, and state clearly that having read through the consultation documents, you object to the project and the Marine Construction Licence, and then include your personal reasons for your objection. Some examples are included below, please feel free to elaborate on points that concern you and put in your own words. Some considerations are:

**MARINE/NATURAL WORLD**

- Discharge of up to 1000m<sup>3</sup> of hypersaline brine per hour per day (24,000m<sup>3</sup> of toxic brine per day) for 4 years into the sea, just 450m from the shore near Castle Robin at Islandmagee, creating a benthic dead zone.
  - Designated Special Area of Conservation (North Channel dSAC, directly into which the hypersaline brine will be discharged, recently designated for Harbour Porpoise)
  - Special Protected Areas: Proposed East Coast (NI) Marine SPA (abstract/discharge area is within the pSPA boundary)
  - Larne Lough SPA (with red flagged endangered Roseate Tern a priority species)
  - Areas of Specific Scientific Interest (ASSIs: The Gobbins, Muck Isle, The Maidens)
  - Only Northern Ireland land based breeding puffin colony near to discharge area
  - Death of sea-life and prey species (potential impact on the food chain)
  - Threat to sea birds and feeding grounds
  - Concerns that protected species porpoises/otters/dolphins could be displaced.
- There is no detailed analysis of what the effect of saline concentration will be south of the discharge area with the "bolero" between Muck Island and Islandmagee.

**AFFECT ON PEOPLE**

- Potential impact on leisure pursuits fishing/diving/swimming/boating
- Potential negative impact on tourism / Gobbins Project
- Potential impact on local industry, fishermen, lobster fishermen

**LACK OF NEED**

- Only a "skeleton staff" required to operate facilities after construction according to the public consultation documents.
- No evidence of need for the gas storage provided in the public consultation documents and gas will be withdrawn in the move to carbon free/neutral, with a risk then of the caverns being used for other purposes (nuclear storage etc).

**CAVERN CONCERNS**

- Serious concerns over cavern safety, now and the long term.
- Deemed a high risk project by Northern Ireland Health and Safety Executive.
- How any licences facilitating the gas storage project will affect your peace of mind and well being.
- There is a risk of intrusive ballast dykes in the proposed area which could

threaten the safety, a previous geological report suggested that the Salt Beds east of Ballygally to Larne would be a safer location.

“As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.”

[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**To:** [REDACTED] [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Energy Marine Licence Consultation ML 28\_12  
**Date:** 07 February 2020 16:58:06

---

Objection from [REDACTED]

Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Email: [REDACTED]  
7 February 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

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- The area for development falls within Special Protected Areas: Proposed East Coast (NI) Marine SPA ( and the abstract/discharge area is within the pSPA boundary)
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- I have serious concerns over cavern safety, now and the long term and I consider it a risk that the caverns may be used for alternative unsafe storage means in the future. The project has already been identified as high risk by Northern Ireland Health and Safety Executive.

Yours sincerely

██████████

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Extension to consultation period - Islandmagee Gas Storage project  
**Date:** 07 February 2020 19:38:01  
**Importance:** High

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Dear Marine Licensing Team

I understand that the company making the application for this license has announced in an RNS an extension of the Public Consultation period. Can you kindly confirm if this is the case and if so why it has been decided to do extend this period? Is this a normal occurrence and is it something DAERA only decide to do or can the company request this? Many thanks for your time. I know you are very busy.

Kind regards

[REDACTED]



**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [DAERA Marine Licensing Team](#)  
**Subject:** F/2010/0092/F ml 28\_12  
**Date:** 08 February 2020 10:33:49

---

Dear Planning ,

I have forwarded a letter of objection to marine licensing in which i have raised concerns regarding the location of caverns as outlined in planning application. Am not sure whether or not this has been drawn to your attention yet or not .

As per project description within daera consultation page :

" The well-heads and well pad will be located onshore although the boreholes will be directionally drilled out under Larne Lough to the positions where the caverns will be constructed."

The updated planning application 2019 states :

" Note: the cavern locations shown are estimates only and will only be confirmed at detailed design stage, some may even be located under the land rather than under the Lough "

The declaration within the updated planning application that the location is as yet unknown , would in my opinion suggest , that the original planning application was flawed.

Taking this substantial change to a significant element of the application into consideration , please could you advise your intent , with regard to the status of this planning application and whether a full and complete new application process will be required .

Yours faithfully

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Gas caverns Islandmagee  
**Date:** 09 February 2020 18:44:16

---

[REDACTED]

Sunday 9 Feb. 2020

To whom it may concern, I wish to lodge my objection to Marine Construction License Application ML 28\_12.

Yours faithfully,

[REDACTED]

Consultee Response Sheet

[Insert Name and Organisation]

(Please fill out all relevant parts)

Please indicate if you have 'no objections' to this project

Under what legislation/regulations do you have comments to make?

What specific objections do you have to this project and why?

WE ARE CONCERNED AT THE EFFECT OF POURING  
OUT SALT FROM THE COBBINS ON THE SALINITY  
LEVELS AND THE IMPACT THIS WILL HAVE ON  
LOBSTER, CLAB AND SCALAR STOCKS

Is there mitigation which you could recommend to offset these objections?  
Please specify

Are there any European Designations affected by this project? What features are affected and how are they affected?

Do you require monitoring to be put in place?

YES

Describe this monitoring (inc. type, frequency, limits, distribution)?

TESTING

Are there any timing restrictions which you would apply to the project?

YES

Do you have a requirement for any further information to be forwarded to you?

YES

Any other comments

Il est interdit de révéler les informations contenues dans ce document à des tiers sans la permission écrite de la direction.

Confidentiel

CONSULTEZ VOTRE CHEF POUR PLUS D'INFORMATIONS

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** FW: Islandmagee Energy Limited - ML 28\_12  
**Date:** 10 February 2020 09:30:33

---

I refer to previous correspondence herein and would be obliged to receive a response as a matter of urgency, particularly as your website states closing date of 7th February for the public consultation and no other information is provided in light of Infrastrata's news release regarding an extension.

Regards,

[REDACTED]

---

**From:** [REDACTED] <[REDACTED]>  
**Sent:** 07 February 2020 13:47  
**To:** DAERA Marine Licensing Team <[REDACTED]>  
**Subject:** FW: Islandmagee Energy Limited - ML 28\_12

I refer to previous correspondence concerning the Public Consultation and note this morning that Infrastrata have released a statement advising that they have decided to extend the PC to March (link attached).

"We are delighted with the positive response that we have received during the consultation process. In order to accommodate further requests to attend and learn more about the Project, we have decided to extend the process. We remain confident that the marine license will be issued following due process. The extensive scientific work undertaken on the project clearly indicates that the project will comply with the regulatory framework that is currently in place."

As I'm sure I do not need to point out, this form of notification is extremely concerning, not least because no notice of such a decision has been published on your website.

Kindly address this point as a matter of urgency.

Regards,

[REDACTED]

<https://polaris.brighterir.com/public/infrastrata/news/rns/story/x5lz38r/export>

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**From:** [REDACTED]

**Sent:** 04 February 2020 22:46

**To:** DAERA Marine Licensing Team <[REDACTED]>

**Subject:** Islandmagee Energy Limited - ML 28\_12

I refer to my letter of objection dated 3<sup>rd</sup> February 2019 regarding the above application and would be grateful if you could clarify the following points which, whilst integral to my objection and should be treated as such, require a more urgent response in order that I may further assess the application:-

As I have stated in my objection letter and mentioned to Joe Breen at one of the Information Sessions attended by DAERA, it is extremely difficult to ascertain what environmental information is still relevant and which documents have been partly, or wholly, updated. Please therefore clarify which parts of the Environmental Statements have been superceded and/or amended. Please provide "marked-up" versions of the documents so I may fully understand what updates have been completed. Alternatively, a list or table specifying what deletions or amendments have been done would suffice.

As I understand the project to be deemed "high risk" requiring the input of Health & Safety Executive NI and Geological Survey of NI, please provide copies of their consultation responses.

Please advise where I can locate a full set of detailed, to-scale drawings of what is proposed by the applicant, including detailed to-scale drawing showing precise location of where the caverns are proposed to be sited (ref: Page 16 of RPS' Report in 2019 Updated Application).

I look forward to hearing from you as soon as possible.

Regards,

[REDACTED]

**From:** [ROBINSON, Gavin](#)  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: Islandmagee Energy Marine License  
**Date:** 10 February 2020 10:09:45

---

Dear Team,

I write in support of the Islandmagee Energy Marine License that you have been consulting upon.

The Department will be well aware of the strategic benefits associated with the project; the intrinsic benefits of security for supply and the need to enhance our gas storage capacity given the increased reliance upon renewable supply that by its very nature fluctuates widely.

From my constituency perspective, I would ask that you similarly consider the economic benefits associated with this scheme. The retention of Harland and Wolff and forward business plan has associated with it significant manufacturing opportunities connected with the tank fabrication. Securing dozens of jobs and creating many more, this project, if passed, will safeguard our historic yard and secure its presence in Belfast for many years to come.

Whilst recognising there will be other environmental impacts the Department will have to weigh, I believe this project offers an opportunity to positively consider a home grown energy solution that will demonstrate Northern Ireland is open for business and capable of progressing major applications of regional significance as the Executive embarks on this new era.

Yours sincerely,

Gavin



Gavin J Robinson MP  
Member of Parliament for East Belfast

Strandtown Hall  
96 Belmont Avenue  
Belfast  
BT4 3DE



028 9047 3111



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**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: Objectionto Islandmagee Energy / Infrastrata Marine Construction Licence Application  
**Date:** 10 February 2020 11:42:58

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Good morning

There are rumours that the closing date for submissions has been extended, is this correct?

Many thanks in anticipation.

On Mon, 10 Feb 2020, 11:36 DAERA Marine Licensing Team,  
<[REDACTED]> wrote:

Thank you for the response to the consultation.

Marine Licensing Team

**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 07 February 2020 16:57  
**To:** DAERA Marine Licensing Team <[REDACTED]>  
**Subject:** Objectionto Islandmagee Energy / Infrastrata Marine Construction Licence Application

**Ref: Public Consultation re Islandmagee Energy Marine Construction Licence ML 28\_12**

Please quote the above marine licence number, and state clearly that having read through the consultation documents, you object to the project and the Marine Construction Licence, and then include your personal reasons for your objection. Some examples are included below, please feel free to elaborate on points that concern you and put in your own words. Some considerations are:

**MARINE/NATURAL WORLD**

- Discharge of up to 1000m<sup>3</sup> of hypersaline brine per hour per day (24,000m<sup>3</sup> of toxic brine per day) for 4 years into the sea, just 450m from the shore near Castle Robin at Islandmagee, creating a benthic dead zone.
- Designated Special Area of Conservation (North Channel dSAC, directly into which the hypersaline brine will be discharged, recently designated for Harbour Porpoise)
- Special Protected Areas: Proposed East Coast (NI) Marine SPA

(abstract/discharge area is within the pSPA boundary)

- Larne Lough SPA (with red flagged endangered Roseate Tern a priority species)
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- Death of sea-life and prey species (potential impact on the food chain)
- Threat to sea birds and feeding grounds
- Concerns that protected species porpoises/otters/dolphins could be displaced.

There is no detailed analysis of what the effect of saline concentration will be south of the discharge area with the "bolero" between Muck Island and Islandmagee.

#### **AFFECT ON PEOPLE**

- Potential impact on leisure pursuits fishing/diving/swimming/boating
- Potential negative impact on tourism / Gobbins Project
- Potential impact on local industry, fishermen, lobster fishermen

#### **LACK OF NEED**

- Only a "skeleton staff" required to operate facilities after construction according to the public consultation documents.
- No evidence of need for the gas storage provided in the public consultation documents and gas will be withdrawn in the move to carbon free/neutral, with a risk then of the caverns being used for other purposes (nuclear storage etc).

#### **CAVERN CONCERNS**

- Serious concerns over cavern safety, now and the long term.
- Deemed a high risk project by Northern Ireland Health and Safety Executive.
- How any licences facilitating the gas storage project will affect your peace of mind and well being.
- There is a risk of intrusive ballatic dykes in the proposed area which could threaten the safety, a previous geological report suggested that the Salt Beds east

of Ballygally to Larne would be a safer location.

“As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.”

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** RE: Islandmagee Gas storage ML28\_12  
**Date:** 10 February 2020 14:46:50  
**Attachments:** [image001.png](#)

---

Good afternoon,

I trust you are well.

Would you be so kind as to review the below for me please and feedback?

Why is Infrastrata stating that this he been extended until 23<sup>rd</sup> March and if that is the case some clarity around that decision and why?, along with the lack of engagement to the public would be most appreciated. I must repeat, myself and others worked incredibly hard and all in our own time to ensure that this deadline was met, as this is the deadline delivered. There was and has not been any comms stating that this was due to be extended.

Of course, I trust and believe nothing that comes from that “ Organisation” with regards to announcements and updates however we do have a conflict here that as you can imagine, is causing some confusion and uncertainty as to what exactly is going on here.

Your website states that it is closed and it has been since the cut-off date.

Thank you in advance for your time.

Kindest Regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 07 February 2020 09:11  
**To:** 'DAERA Marine Licensing Team'  
**Subject:** Islandmagee Gas storage ML28\_12

Good morning,

Why has there been no communication from the Dept that this consultation period has been



**To:** DAERA Marine Licensing Team <[REDACTED]>

**Subject:** Objection to Islandmagee Energy / Infrastrata Marine Construction Licence Application

**Ref: Public Consultation re Islandmagee Energy Marine Construction Licence ML 28\_12**

Please quote the above marine licence number, and state clearly that having read through the consultation documents, you object to the project and the Marine Construction Licence, and then include your personal reasons for your objection. Some examples are included below, please feel free to elaborate on points that concern you and put in your own words. Some considerations are:

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There is no detailed analysis of what the effect of saline concentration will be south of the discharge area with the "bolero" between Muck Island and Islandmagee.

## **AFFECT ON PEOPLE**

- Potential impact on leisure pursuits fishing/diving/swimming/boating
- Potential negative impact on tourism / Gobbins Project
- Potential impact on local industry, fishermen, lobster fishermen

## **LACK OF NEED**

- Only a “skeleton staff” required to operate facilities after construction according to the public consultation documents.
- No evidence of need for the gas storage provided in the public consultation documents and gas will be withdrawn in the move to carbon free/neutral, with a risk then of the caverns being used for other purposes (nuclear storage etc).

## **CAVERN CONCERNS**

- Serious concerns over cavern safety, now and the long term.
- Deemed a high risk project by Northern Ireland Health and Safety Executive.
- How any licences facilitating the gas storage project will affect your peace of mind and well being.
- There is a risk of intrusive ballatic dykes in the proposed area which could threaten the safety, a previous geological report suggested that the Salt Beds east of Ballygally to Larne would be a safer location.

“As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.”

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** RE: Islandmagee Gas storage ML28\_12  
**Date:** 10 February 2020 14:56:31  
**Attachments:** [image001.png](#)

---

Thank you.

Appreciate the feedback.

Kindest Regards

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** DAERA Marine Licensing Team [mailto:[REDACTED]]  
**Sent:** 10 February 2020 14:55  
**To:** [REDACTED]  
**Subject:** RE: Islandmagee Gas storage ML28\_12

Thank you for your query.

DAERA are currently seeking legal advice on the consultation and will update the public if an extension is issued in due course.

Marine Licensing Team

---

**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 07 February 2020 09:11  
**To:** DAERA Marine Licensing Team <[REDACTED]>  
**Subject:** Islandmagee Gas storage ML28\_12

Good morning,

Why has there been no communication from the Dept that this consultation period has been extended to 23<sup>rd</sup> March?...

If this is a request from [REDACTED] simply based on the feedback he has had from various organisations that have made their objections public then I would take a very dim view if that was the case. There is no mention of the change on your website and when was this agreed and



shared?

People have worked tirelessly to ensure they hit the deadline.

kindest regards

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

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Registered office: 500 Brook Drive, Reading, RG2 6UU

Registered in England and Wales with number 2591237

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** RE: Islandmagee Gas storage ML28\_12  
**Date:** 10 February 2020 16:02:20  
**Attachments:** [image001.png](#)

---

Thank you. Apologies as I have had two replies to the same question.

I do find this situation rather perplexing as Infrastrata did broadcast on the day of the closing of the PC, that "They" had decided to extend the PC after consultation with the Dept?....which does not really sit well with me and others and one would expect a rather robust review of that. If the PC does get extended then I will be challenging why and also why the message came from them on the day and not the appropriate dept and also it does question the transparency and integrity of this particular process does it not.

Without prejudice, this does not feel right to me, at all.

Kindest Regards

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** DAERA Marine Licensing Team [mailto:[REDACTED]]  
**Sent:** 10 February 2020 15:01  
**To:** [REDACTED]  
**Subject:** RE: Islandmagee Gas storage ML28\_12

DAERA are currently seeking legal advice on the consultation and will update the public if an extension is issued in due course.

Marine Licensing Team

---

**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 10 February 2020 14:47  
**To:** DAERA Marine Licensing Team  
**Subject:** RE: Islandmagee Gas storage ML28\_12

Good afternoon,

I trust you are well.

Would you be so kind as to review the below for me please and feedback?

Why is Infrastrata stating that this has been extended until 23<sup>rd</sup> March and if that is the case some clarity around that decision and why?, along with the lack of engagement to the public would be most appreciated. I must repeat, myself and others worked incredibly hard and all in our own time to ensure that this deadline was met, as this is the deadline delivered. There was and has not been any comms stating that this was due to be extended.

Of course, I trust and believe nothing that comes from that "Organisation" with regards to announcements and updates however we do have a conflict here that as you can imagine, is causing some confusion and uncertainty as to what exactly is going on here.

Your website states that it is closed and it has been since the cut-off date.

Thank you in advance for your time.

Kindest Regards

[Redacted]

---

**From:** [Redacted]  
**Sent:** 07 February 2020 09:11  
**To:** 'DAERA Marine Licensing Team'  
**Subject:** Islandmagee Gas storage ML28\_12

Good morning,  
Why has there been no communication from the Dept that this consultation period has been extended to 23<sup>rd</sup> March?...

If this is a request from [Redacted] simply based on the feedback he has had from various organisations that have made their objections public then I would take a very dim view if that was the case. There is no mention of the change on your website and when was this agreed and shared?

People have worked tirelessly to ensure they hit the deadline.

kindest Regards

[Redacted]

[Redacted]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Tel Call from [REDACTED] - Islandmagee Consultation Time Query  
**Date:** 10 February 2020 16:24:19

---

I took a telephone call this afternoon from [REDACTED] who is an objector to the Islandmagee Project. We have already received correspondence from her not sure if it was by letter or email.

She wanted to know what was going on re the consultation time - give her the response '*Dept seeking legal advice & website will be updated in due course*'. If the marine licensing webpage has not been updated in a few days she will be in touch again.

[REDACTED]

**From:** [John Blair MLA](#)  
**To:** [DAERA Marine Licensing Team](#)  
**Cc:** [Small, David](#)  
**Subject:** RE: Alliance - Islandmagee Consultation Response  
**Date:** 10 February 2020 17:30:49

---

Thank you for your response.

There is a lot of confusion surrounding this issue. Your website (<https://www.daera-ni.gov.uk/consultations/islandmagee-gas-storage-project-december-2019-consultation-ml-2812>) currently still states that the consultation is closed. This is despite Infrastrata issuing a press release claiming that the public consultation was extended 'in consultation' with DAERA. Any efforts you can make to clarify this confusion as soon as possible will be very gratefully received.

Best wishes

**John Blair MLA**  
**Alliance Party**  
**South Antrim**

Unit 2, 21 Carnmoney Road  
Glengormley  
Newtownabbey  
BT36 6HL

**Tel 02890 840 930**

---

**From:** DAERA Marine Licensing Team [mailto: [REDACTED]]  
**Sent:** 10 February 2020 14:50  
**To:** John Blair MLA  
**Subject:** RE: Alliance - Islandmagee Consultation Response

Thank you for your query.

DAERA are currently seeking legal advice on the consultation and will update the public if an extension is issued in due course.

Marine Licensing Team

---

**From:** John Blair MLA [mailto: [REDACTED]]  
**Sent:** 10 February 2020 13:02  
**To:** DAERA Marine Licensing Team < [REDACTED]>  
**Subject:** RE: Alliance - Islandmagee Consultation Response

Over the last few days I have seen media reports claiming that the consultation has been extended. Can you confirm if this is the case?

Best wishes,

[REDACTED]

---

**From:** DAERA Marine Licensing Team [mailto: [REDACTED]]  
**Sent:** 10 February 2020 13:00  
**To:** Office of John Blair MLA < [REDACTED]>  
**Subject:** RE: Alliance - Islandmagee Consultation Response

Thank you for the response to the consultation.

Marine Licensing Team

---

**From:** Office of John Blair MLA [mailto: [REDACTED]]  
**Sent:** 07 February 2020 14:04  
**To:** DAERA Marine Licensing Team < [REDACTED]>  
**Subject:** Alliance - Islandmagee Consultation Response

Please find the Alliance Party response attached to this email.

Best wishes,

[REDACTED]

[REDACTED]

*Communications and Research Officer*

*John Blair MLA*

*Constituency Office:*

*Unit 2, 21 Carnmoney Road*

*Newtownabbey*

*BT36 6HL*

(E) [REDACTED]

(T) [REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** RE: Islandmagee Gas storage ML28\_12  
**Date:** 13 February 2020 11:24:29  
**Attachments:** [image001.png](#)

---

Good morning,

I see that the comms out by Infrastrata was correct and I also see that there is an additional document?

Can I get some clarity on where that came from and why all of a sudden it is in the suite of documents now and not before plus are people aware?... it is all very strange.

Kindest Regards

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** [REDACTED] (Northern Ireland)  
**Sent:** 10 February 2020 16:02  
**To:** 'DAERA Marine Licensing Team'  
**Subject:** RE: Islandmagee Gas storage ML28\_12

Thank you. Apologies as I have had two replies to the same question.

I do find this situation rather perplexing as Infrastrata did broadcast on the day of the closing of the PC, that "They" had decided to extend the PC after consultation with the Dept?....which does not really sit well with me and others and one would expect a rather robust review of that. If the PC does get extended then I will be challenging why and also why the message came from them on the day and not the appropriate dept and also it does question the transparency and integrity of this particular process does it not.

Without prejudice, this does not feel right to me, at all.

Kindest Regards

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** DAERA Marine Licensing Team [mailto:[REDACTED]]  
**Sent:** 10 February 2020 15:01  
**To:** [REDACTED]  
**Subject:** RE: Islandmagee Gas storage ML28\_12

DAERA are currently seeking legal advice on the consultation and will update the public if an extension is issued in due course.

Marine Licensing Team

---



**From:** [REDACTED] [mailto:[REDACTED]]

**Sent:** 10 February 2020 14:47

**To:** DAERA Marine Licensing Team

**Subject:** RE: Islandmagee Gas storage ML28\_12

Good afternoon,

I trust you are well.

Would you be so kind as to review the below for me please and feedback?

Why is Infrastrata stating that this he been extended until 23<sup>rd</sup> March and if that is the case some clarity around that decision and why?, along with the lack of engagement to the public would be most appreciated. I must repeat, myself and others worked incredibly hard and all in our own time to ensure that this deadline was met, as this is the deadline delivered. There was and has not been any comms stating that this was due to be extended.

Of course, I trust and believe nothing that comes from that “ Organisation” with regards to announcements and updates however we do have a conflict here that as you can imagine, is causing some confusion and uncertainty as to what exactly is going on here.

Your website states that it is closed and it has been since the cut-off date.

Thank you in advance for your time.

Kindest Regards

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** [REDACTED]

**Sent:** 07 February 2020 09:11

**To:** 'DAERA Marine Licensing Team'

**Subject:** Islandmagee Gas storage ML28\_12

Good morning,

Why has there been no communication from the Dept that this consultation period has been extended to 23<sup>rd</sup> March?...

If this is a request from [REDACTED] simply based on the feedback he has had from various organisations that have made their objections public then I would take a very dim view if that was the case. There is no mention of the change on your website and when was this agreed and shared?

People have worked tirelessly to ensure they hit the deadline.

Kindest Regards

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: Extension to consultation period - Islandmagee Gas Storage project  
**Date:** 13 February 2020 19:00:06

---

Dear Marine Licensing Team

I noticed today that you have announced on your web page that there is now an extension to the consultation period on the Islandmagee Gas Storage Project. As this has now been confirmed can you explain why this decision has been made? Many thanks.

Kind regards

[REDACTED]

> On 10 Feb 2020, at 14:53, DAERA Marine Licensing Team <[REDACTED]> wrote:

>

> Thank you for your query.

> DAERA are currently seeking legal advice on the consultation and will update the public if an extension is issued in due course.

> Marine Licensing Team

>

> -----Original Message-----

> From: [REDACTED] [mailto:\[REDACTED\]](mailto:[REDACTED])

> Sent: 07 February 2020 19:38

> To: DAERA Marine Licensing Team <[REDACTED]>

> Subject: Extension to consultation period - Islandmagee Gas Storage project

> Importance: High

>

> Dear Marine Licensing Team

>

> I understand that the company making the application for this license has announced in an RNS an extension of the Public Consultation period. Can you kindly confirm if this is the case and if so why it has been decided to do extend this period? Is this a normal occurrence and is it something DAERA only decide to do or can the company request this? Many thanks for your time. I know you are very busy.

>

> Kind regards

>

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** RE: Islandmagee Gas storage ML28\_12  
**Date:** 14 February 2020 15:50:51  
**Attachments:** [image001.png](#)

---

Thank you for the mail. I appreciate the feedback.

Just for clarity and as mentioned in my original mail but not been addressed, there has been an additional document added that was not part of the original consultation and as below, the reason given for the run of another consultation was due to an oversight in the advertisement?... yet we have another document that has appeared?

Would you be so kind as to support me in understanding how that has landed in and why it was not in the first consultation and the mechanism on how it got there and who requested it to be added?

We seem to have gotten all the way to the end of the consultation before any of this was raised which I find slightly concerning. Also, where can I find a copy of the original advertisement alongside the current advertisement please so I can understand the administrative oversight?

Kindest Regards

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** DAERA Marine Licensing Team [mailto:[REDACTED]]  
**Sent:** 14 February 2020 15:33  
**To:** [REDACTED]  
**Subject:** RE: Islandmagee Gas storage ML28\_12

A previous consultation opened on 20 December 2019 and closed on 7 February 2020. As a result of an administrative oversight in the original newspaper advertisement, the Department with the support of the applicant has decided to run another consultation for a further 42 days. You do not need to make a further response if you have already made a response during the 20 December 2019-7 February 2020 consultation period. Your responses have been logged and will be included consultation process.

<https://www.daera-ni.gov.uk/consultations/islandmagee-gas-storage-project-december-2019-consultation-ml-2812>

Marine Licensing Team

---

**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 13 February 2020 11:24  
**To:** DAERA Marine Licensing Team  
**Subject:** RE: Islandmagee Gas storage ML28\_12

Good morning,

I see that the comms out by Infrastrata was correct and I also see that there is an additional document?

Can I get some clarity on where that came from and why all of a sudden it is in the suite of documents now and not before plus are people aware?... it is all very strange.

Kindest Regards

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 10 February 2020 16:02  
**To:** 'DAERA Marine Licensing Team'  
**Subject:** RE: Islandmagee Gas storage ML28\_12

Thank you. Apologies as I have had two replies to the same question.

I do find this situation rather perplexing as Infrastrata did broadcast on the day of the closing of the PC, that "They" had decided to extend the PC after consultation with the Dept?.....which does not really sit well with me and others and one would expect a rather robust review of that. If the PC does get extended then I will be challenging why and also why the message came from them on the day and not the appropriate dept and also it does question the transparency and integrity of this particular process does it not.

Without prejudice, this does not feel right to me, at all.

Kindest Regards

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** DAERA Marine Licensing Team [[mailto:\[REDACTED\]](mailto:[REDACTED])]  
**Sent:** 10 February 2020 15:01  
**To:** [REDACTED]  
**Subject:** RE: Islandmagee Gas storage ML28\_12

DAERA are currently seeking legal advice on the consultation and will update the public if an extension is issued in due course.

Marine Licensing Team

---

**From:** [REDACTED] ([mailto:\[REDACTED\]](mailto:[REDACTED]))  
**Sent:** 10 February 2020 14:47  
**To:** DAERA Marine Licensing Team <[\[REDACTED\]](mailto:[REDACTED])>  
**Subject:** RE: Islandmagee Gas storage ML28\_12

Good afternoon,

I trust you are well.

Would you be so kind as to review the below for me please and feedback?

Why is Infrastrata stating that this has been extended until 23<sup>rd</sup> March and if that is the case some clarity around that decision and why?, along with the lack of engagement to the public

would be most appreciated. I must repeat, myself and others worked incredibly hard and all in our own time to ensure that this deadline was met, as this is the deadline delivered. There was and has not been any comms stating that this was due to be extended.

Of course, I trust and believe nothing that comes from that "Organisation" with regards to announcements and updates however we do have a conflict here that as you can imagine, is causing some confusion and uncertainty as to what exactly is going on here.

Your website states that it is closed and it has been since the cut-off date.

Thank you in advance for your time.

Kindest Regards

[Redacted signature block]

---

**From:** [Redacted]  
**Sent:** 07 February 2020 09:11  
**To:** 'DAERA Marine Licensing Team'  
**Subject:** Islandmagee Gas storage ML28\_12

Good morning,

Why has there been no communication from the Dept that this consultation period has been extended to 23<sup>rd</sup> March?...

If this is a request from [Redacted] simply based on the feedback he has had from various organisations that have made their objections public then I would take a very dim view if that was the case. There is no mention of the change on your website and when was this agreed and shared?

People have worked tirelessly to ensure they hit the deadline.

Kindest Regards

[Redacted signature block]

-----  
Save Paper - Do you really need to print this e-mail?

Visit [www.virginmedia.com](http://www.virginmedia.com) for more information, and more fun.

This email and any attachments are or may be confidential and legally privileged and are sent solely for the attention of the addressee(s).

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#); [REDACTED]; [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Geological advice on Islandmagee Gas Storage Marine Licence application.  
**Date:** 17 February 2020 10:04:16  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

---

Dear [REDACTED],

I did put together a response which was the subject of some internal discussions between ourselves and DfE Minerals & Petroleum Branch (and so hadn't been submitted yet). In the light of the welcome extension to the consultation we will definitely be submitting a response but I'd like to contact you first to get an idea of the full scope of the issues we might be covering.

Best regards

[REDACTED]

Geological Survey of NI  
Department for the Economy  
Dundonald House  
Upper Newtownards Road  
Belfast, BT4 3SB  
Tel: 028 [REDACTED]  
TextRelay: 18001 028 9052 0970  
Web: [www.economy-ni.gov.uk](http://www.economy-ni.gov.uk)



**Please consider the environment - do you really need to print this e-mail?**

---

**From:** DAERA Marine Licensing Team  
**Sent:** 14 February 2020 15:16  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Geological advice on Islandmagee Gas Storage Marine Licence application.

Dear [REDACTED]

We are currently running an extended consultation on the marine licence application for the Islandmagee Gas Storage Project which proposes solution mining of deep sea caverns under Larne Lough.

Please see our project page for consultation documents and information.

<https://www.daera-ni.gov.uk/consultations/islandmagee-gas-storage-project-december-2019-consultation-ml-2812>

We had previously circulated this consultation to GSNI but have not received a response as yet. Please provide response on the geological aspects of this project to [MarineLicensingTeam@daera-ni.gov.uk](mailto:MarineLicensingTeam@daera-ni.gov.uk) by 27<sup>th</sup> March.

Many thanks,

[REDACTED]

---

Senior Scientific Officer | Marine Licensing | DAERA Marine & Fisheries Division | 1st Floor | Klondyke

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: Additional information regarding Islandmagee Gas Storage application ML 28\_12  
**Date:** 18 February 2020 15:37:52

---

Good Afternoon

Thank you for your email.

Can you please confirm why the consultation period has been extended? This appear to be unusual.

Yours Sincerely

[REDACTED]

On Tue, 18 Feb 2020, 15:30 DAERA Marine Licensing Team,  
<[REDACTED]> wrote:

Dear Sir/Madam,

Following on from the email you received today advising you of the extended consultation period for the Islandmagee Gas Storage project, ML 28\_12, I wish to draw your attention to the following detail:

- The consultation will now expire on Friday 27 March 2020 at 17.00; and
- The addition of the HR Wallingford 3rd part audit of Brine Dispersion Model (consultation item 15 – see link below)

<https://www.daera-ni.gov.uk/consultations/islandmagee-gas-storage-project-december-2019-consultation-ml-2812>

For those of you who have emailed on behalf of other members of the public, please pass this information on.

**Kind Regards**

Marine Licensing Team

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: Additional information regarding Islandmagee Gas Storage application ML 28\_12  
**Date:** 18 February 2020 16:07:39

---

Hi,

Can I ask who I am corresponding in person with and also why was the consultation period extended?

What are the considerations of the Marine Tasks Forces objections?

Many thanks,

[REDACTED]

On Tuesday, 18 February 2020, DAERA Marine Licensing Team  
<[REDACTED]> wrote:

Dear Sir/Madam,

Following on from the email you received today advising you of the extended consultation period for the Islandmagee Gas Storage project, ML 28\_12, I wish to draw your attention to the following detail:

- The consultation will now expire on Friday 27 March 2020 at 17.00; and
- The addition of the HR Wallingford 3rd part audit of Brine Dispersion Model (consultation item 15 – see link below)

<https://www.daera-ni.gov.uk/consultations/islandmagee-gas-storage-project-december-2019-consultation-ml-2812>

For those of you who have emailed on behalf of other members of the public, please pass this information on.

**Kind Regards**

Marine Licensing Team





**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: Additional information regarding Islandmagee Gas Storage application ML 28\_12  
**Date:** 18 February 2020 16:42:09

---

Thank you for the information. Can I lodge another note of dissatisfaction, in relation to this update? I states last amended in 2019, so why has it only been added now?

Please advise.

Regards  
[REDACTED]

On Tue, 18 Feb 2020 at 15:30, DAERA Marine Licensing Team  
<[REDACTED]> wrote:

Dear Sir/Madam,

Following on from the email you received today advising you of the extended consultation period for the Islandmagee Gas Storage project, ML 28\_12, I wish to draw your attention to the following detail:

- The consultation will now expire on Friday 27 March 2020 at 17.00; and
- The addition of the HR Wallingford 3rd part audit of Brine Dispersion Model (consultation item 15 – see link below)

<https://www.daera-ni.gov.uk/consultations/islandmagee-gas-storage-project-december-2019-consultation-ml-2812>

For those of you who have emailed on behalf of other members of the public, please pass this information on.

**Kind Regards**

Marine Licensing Team

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: Additional information regarding Islandmagee Gas Storage application ML 28\_12  
**Date:** 19 February 2020 08:29:44

---

Surely this additional report should be excluded from your determinations as it was submitted after the original deadline?

Sent from my iPhone

On 18 Feb 2020, at 15:30, DAERA Marine Licensing Team  
<[REDACTED]> wrote:

Dear Sir/Madam,

Following on from the email you received today advising you of the extended consultation period for the Islandmagee Gas Storage project, ML 28\_12, I wish to draw your attention to the following detail:

<!--[if !supportLists]-->• <!--[endif]-->The consultation will now expire on Friday 27 March 2020 at 17.00; and

<!--[if !supportLists]-->• <!--[endif]-->The addition of the HR Wallingford 3rd part audit of Brine Dispersion Model (consultation item 15 – see link below)

<https://www.daera-ni.gov.uk/consultations/islandmagee-gas-storage-project-december-2019-consultation-ml-2812>

For those of you who have emailed on behalf of other members of the public, please pass this information on.

**Kind Regards**

Marine Licensing Team

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** ref ML28.12 Islandmagee Energy Marine construction license application  
**Date:** 19 February 2020 09:46:31

---

Dear Marine Licensing Team,

I am writing to voice my support for building the gas storage caverns in Islandmagee.

The company will create hundreds of jobs and gas storage is safe.

I have done a lot of research on the topic and there are no incidents in the past at other gas storage sites ( anywhere in the world) that have caused damage to the environment and other marine life. And gas storage sites exist in numerous locations around the globe.

I have a few friends among the local residents, some oppose it and some are for it.

The company will not just create jobs but will also guarantee security of gas supply at uncertain geopolitical times.

I have spoken to [REDACTED] who has assured me the dispersion of brine is within safe parameters for birds and fish in the sea at Islandmagee. The environment is something we all care about and as an investor I would certainly not want to see any destruction brought about by Infastrata.

Therefore, I would like to voice my strong support for this project.

I look forward to islandmagee gas storage becoming a reality in the near future.

Kind Regards

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: Additional information regarding Islandmagee Gas Storage application ML 28\_12  
**Date:** 19 February 2020 12:22:45

---

Hello Marine Licensing Team,

I have a few questions regarding this, now expanded, consultation period.

- 1) Since there is new information now given out, are we allowed to write a second response letter to you regarding this project?
- 2) Do you plan on sharing the results of the letters sent to you with Islandmagee Energy, before the now extended consultation deadline? Basically, can they use our responses to better their chance for a marine license being granted by your team?
- 3) If you do reject this project, can they come back and try again? If so, how many attempts will you allow them? I am originally from the US, and companies there use public input from previous attempts to bolster their 2nd, 3rd, or 4th attempts at pushing in massive projects the locals obviously did not want. So, my penultimate question is are we using public monies, i.e. DAERA time to meet the public, DAERA time to analyse data, DAERA time to meet amongst yourselves to assess their "project data outputs", so they have a better chance of garnering this marine license on their next go? Do we have a level playing field?

Many thanks,

[REDACTED]

---

**From:** DAERA Marine Licensing Team <[REDACTED]>  
**Sent:** 18 February 2020 3:30 PM  
**Subject:** Additional information regarding Islandmagee Gas Storage application ML 28\_12

Dear Sir/Madam,

Following on from the email you received today advising you of the extended consultation period for the Islandmagee Gas Storage project, ML 28\_12, I wish to draw your attention to the following detail:

- The consultation will now expire on Friday 27 March 2020 at 17.00; and
- The addition of the HR Wallingford 3rd part audit of Brine Dispersion Model (consultation item 15 – see link below)

<https://www.daera-ni.gov.uk/consultations/islandmagee-gas-storage-project-december-2019-consultation-ml-2812>

For those of you who have emailed on behalf of other members of the public, please pass this information on.

**Kind Regards**

Marine Licensing Team

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: Additional information regarding Islandmagee Gas Storage application ML 28\_12  
**Date:** 19 February 2020 15:39:46

---

Having read through the updated report from HR Wallingford I have notice that it states on two occasions:

"Since then a confirmation borehole has been completed at the discharge site".

When was this borehole drilled and how deep did it go.

What significance would this borehole serve.

Can you confirm the borehole previously drilled in Larne Lough at the "well pad" is NOT the borehole in question as it is not at the discharge point.

Thank you for the information supplied

[REDACTED]

---

**From:** DAERA Marine Licensing Team <[REDACTED]>  
**Sent:** 18 February 2020 15:30  
**Subject:** Additional information regarding Islandmagee Gas Storage application ML 28\_12

Dear Sir/Madam,

Following on from the email you received today advising you of the extended consultation period for the Islandmagee Gas Storage project, ML 28\_12, I wish to draw your attention to the following detail:

- The consultation will now expire on Friday 27 March 2020 at 17.00; and
- The addition of the HR Wallingford 3rd part audit of Brine Dispersion Model (consultation item 15 – see link below)

<https://www.daera-ni.gov.uk/consultations/islandmagee-gas-storage-project-december-2019-consultation-ml-2812>

For those of you who have emailed on behalf of other members of the public, please pass this information on.

**Kind Regards**

Marine Licensing Team

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: Islandmagee energy.  
**Date:** 20 February 2020 11:55:52

---

Hi.

I'm just wondering if I am still on your mailing list. I have already emailed you in support of the gas storage project and had a response. As the Consultation process has been extended other people I know have received email notification from yourself to inform them of this but as to date I have not. As I say I'm just checking to make sure you still have my email of support for the project and that I'm still on the mailing list. Thank you.

[REDACTED]

> On 7 Feb 2020, at 12:18, DAERA Marine Licensing Team <[REDACTED]> wrote:

>

> Thank you for the response to the consultation.

> Marine Licensing Team

>

> -----Original Message-----

> From: [REDACTED] [[mailto:\[REDACTED\]](mailto:[REDACTED])]

> Sent: 06 February 2020 20:48

> To: DAERA Marine Licensing Team <[REDACTED]>

> Subject: Islandmagee energy.

>

> Dear DAERA.

> As a local resident of Islandmagee I would like to tell you of my SUPPORT for the proposed project. I have seen and studied the information available and I understand there will be a small area affected which will repair itself after the brine pumping has finished. Islandmagee is in need of investment and the £1 million pounds that the company is giving would go a long way to improving the area for all its residents. I also feel that the caverns will help the UK meet its 2050 carbon reduction targets as they can store hydrogen. The creation of local jobs is definitely needed and apprenticeships for local young people a huge plus!!

> I firmly believe that industry and tourism can very much live together on the island.

> I understand that people have their objections but as there are NO PERMANENT negative effects for the marine life, I feel that the positives for the area and the country cannot be ignored.

> Trusting that the correct decision for the future will be made by yourselves.

>

>

[REDACTED]



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: Islandmagee energy.  
**Date:** 20 February 2020 13:53:17

---

Thank you for your prompt response.

Re the email [REDACTED] I have NEVER had this as an email address. I find this very concerning. As someone has created an email address in my name and used it for such a sensitive subject. Can I request under the freedom of information act the original email sent in my name please. I wait your prompt response. Thank you.

[REDACTED]

> On 20 Feb 2020, at 12:00, DAERA Marine Licensing Team <[REDACTED]> wrote:

>

> Good afternoon [REDACTED]

>

> I can confirm that an email was sent to the email address [REDACTED] yesterday to advise you that the consultation period had been extended. This is the email address you used when you submitted your consultation response. The email bounced back to the Marine Licensing inbox as it was undeliverable. I will now forward the email advising you of the extension to the email address [REDACTED]

>

> Regards,

>

> Marine Licensing Team

>

> -----Original Message-----

> From: [REDACTED] [\[mailto:\[REDACTED\]\]](#)

> Sent: 20 February 2020 11:56

> To: DAERA Marine Licensing Team <[REDACTED]>

> Subject: Re: Islandmagee energy.

>

> Hi.

> I'm just wondering if I am still on your mailing list. I have already emailed you in support of the gas storage project and had a response. As the Consultation process has been extended other people I know have received email notification from yourself to inform them of this but as to date I have not. As I say I'm just checking to make sure you still have my email of support for the project and that I'm still on the mailing list. Thank you.

>

> [REDACTED]

>

>> On 7 Feb 2020, at 12:18, DAERA Marine Licensing Team <[REDACTED]> wrote:

>>

>> Thank you for the response to the consultation.

>> Marine Licensing Team

>>

>> -----Original Message-----

>> From: [REDACTED] [\[mailto:\[REDACTED\]\]](#)

>> Sent: 06 February 2020 20:48

>> To: DAERA Marine Licensing Team <[REDACTED]>

>> Subject: Islandmagee energy.

>>

>> Dear DAERA.

>> As a local resident of Islandmagee I would like to tell you of my SUPPORT for the proposed project. I have seen and studied the information available and I understand there will be a small area affected which will repair itself after the brine pumping has finished. Islandmagee is in need of investment and the £1 million pounds that

the company is giving would go a long way to improving the area for all its residents. I also feel that the caverns will help the UK meet its 2050 carbon reduction targets as they can store hydrogen. The creation of local jobs is definitely needed and apprenticeships for local young people a huge plus!!

>> I firmly believe that industry and tourism can very much live together on the island.

>> I understand that people have their objections but as there are NO PERMANENT negative effects for the marine life, I feel that the positives for the area and the country cannot be ignored.

>> Trusting that the correct decision for the future will be made by yourselves.

>>

>>

>

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: Islandmagee energy.  
**Date:** 20 February 2020 15:21:34

---

Hi [REDACTED]

That is NOT my email address.

[REDACTED] this is very worrying. Can you please send me my copy of the letter of support for the gas storage project I sent to you earlier this month. This should be very straight forward. If other letters have been sent using my name please under FOI can I have these sent to me.

Again I find this very worrying.

[REDACTED]

> On 20 Feb 2020, at 14:32, DAERA Marine Licensing Team <[REDACTED]> wrote:

>

> [REDACTED]

>

> Please accept my apology for the typing error. I can confirm that the email you sent your consultation response was received from [REDACTED]

>

> Please confirm if this is the email address you sent your consultation response from on 6th February 2020.

>

> Regards,

> [REDACTED]

>

> -----Original Message-----

> From: [REDACTED] [mailto:\[REDACTED\]](#)

> Sent: 20 February 2020 13:53

> To: DAERA Marine Licensing Team <[REDACTED]>

> Subject: Re: Islandmagee energy.

>

> Thank you for your prompt response.

> Re the email [REDACTED] I have NEVER had this as an email address. I find this very concerning. As someone has created an email address in my name and used it for such a sensitive subject. Can I request under the freedom of information act the original email sent in my name please. I wait your prompt response.

> Thank you.

>

[REDACTED]

>

>> On 20 Feb 2020, at 12:00, DAERA Marine Licensing Team <[REDACTED]> wrote:

>>

>> Good afternoon [REDACTED]

>>

>> I can confirm that an email was sent to the email address [REDACTED] yesterday to advise you that the consultation period had been extended. This is the email address you used when you submitted your consultation response. The email bounced back to the Marine Licensing inbox as it was undeliverable. I will now forward the email advising you of the extension to the email address [REDACTED]

>>

>> Regards,

>>

>> Marine Licensing Team

>>

>> -----Original Message-----

>> From: [REDACTED] [mailto:\[REDACTED\]](#)

>> Sent: 20 February 2020 11:56

>> To: DAERA Marine Licensing Team <[REDACTED]>

>> Subject: Re: Islandmagee energy.

>>

>> Hi.

>> I'm just wondering if I am still on your mailing list. I have already emailed you in support of the gas storage project and had a response. As the Consultation process has been extended other people I know have received email notification from yourself to inform them of this but as to date I have not. As I say I'm just checking to make sure you still have my email of support for the project and that I'm still on the mailing list. Thank you.

>>

>> [REDACTED]

>> [REDACTED]

>>

>>>> On 7 Feb 2020, at 12:18, DAERA Marine Licensing Team <[REDACTED]>

wrote:

>>>

>>> Thank you for the response to the consultation.

>>> Marine Licensing Team

>>>

>>> -----Original Message-----

>>> From: [REDACTED] [mailto:\[REDACTED\]](mailto:[REDACTED])

>>> Sent: 06 February 2020 20:48

>>> To: DAERA Marine Licensing Team <[REDACTED]>

>>> Subject: Islandmagee energy.

>>>

>>> Dear DAERA.

>>> As a local resident of Islandmagee I would like to tell you of my SUPPORT for the proposed project. I have seen and studied the information available and I understand there will be a small area affected which will repair itself after the brine pumping has finished. Islandmagee is in need of investment and the £1 million pounds that the company is giving would go a long way to improving the area for all its residents. I also feel that the caverns will help the UK meet its 2050 carbon reduction targets as they can store hydrogen. The creation of local jobs is definitely needed and apprenticeships for local young people a huge plus!!

>>> I firmly believe that industry and tourism can very much live together on the island.

>>> I understand that people have their objections but as there are NO PERMANENT negative effects for the marine life, I feel that the positives for the area and the country cannot be ignored.

>>> Trusting that the correct decision for the future will be made by yourselves.

>>>

>>> [REDACTED]

>>> [REDACTED]

>>> [REDACTED]

>>> [REDACTED]

>>> [REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** RE: Additional information regarding Islandmagee Gas Storage application ML 28\_12  
**Date:** 21 February 2020 11:47:16  
**Attachments:** [image001.png](#)

---

Just to add to this, as there is an implication here of pre determination.

Kindest Regards

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 21 February 2020 10:42  
**To:** 'DAERA Marine Licensing Team'  
**Subject:** RE: Additional information regarding Islandmagee Gas Storage application ML 28\_12

Morning,

Can you shed any light on the speculation that I am reading about the info session that was held at the Gobbins last night please. Why is it that DAERA's name is constantly in commentary from Infrastrata stating that the dept "Fully Support the Science" and can see what a "Great project this is"?

I am getting increasingly frustrated that they can happily use the Depts name without any feedback, it does make me very uneasy with the whole process and governance.

Kindest Regards

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** DAERA Marine Licensing Team [mailto:[REDACTED]]  
**Sent:** 18 February 2020 15:30  
**Subject:** (Possible Spam)Additional information regarding Islandmagee Gas Storage application ML 28\_12

Dear Sir/Madam,

Following on from the email you received today advising you of the extended consultation period for the Islandmagee Gas Storage project, ML 28\_12, I wish to draw your attention to the following detail:

- The consultation will now expire on Friday 27 March 2020 at 17.00; and
- The addition of the HR Wallingford 3rd part audit of Brine Dispersion Model (consultation item 15 – see link below)

<https://www.daera-ni.gov.uk/consultations/islandmagee-gas-storage-project-december-2019->

[consultation-ml-2812](#)

For those of you who have emailed on behalf of other members of the public, please pass this information on.

**Kind Regards**

Marine Licensing Team

[Redacted signature block containing multiple lines of blacked-out text]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** FW: ref nML28\_12 Islandmagee Marine licence Consultation.  
**Date:** 21 February 2020 17:32:42

---

Dear Sir/ Madam.

REF ISLANDMAGEE ENERGY MARINE LICENCE CONSULTATION ML 28- 12.

With reference to the Marine Construction Licence application 2019 consultation ML 28-12. BY Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of BRINE from the creation of caverns by solution mining , I have examined the PUBLIC CONSULTATION DOCUMENTS and wish to OBJECT STRONGLY TO THE PROJECT and the MARINE CONSTRUCTION LICENCE.

Firstly , NO EVIDENCE OF NEED FOR THE PROPOSAL has been released for public consultation , and I believe the project to be unnecessary with huge ENVIRONMENTAL IMPACTS, both in the scale and associated risks of the underground caverns, the environmental impact on land and sea, WITH THE ADMISSON by the COMPANY of the DEAD ZONE IN A DSAC, designated for HARBOUR PORPOISE.

As member of the public with serious concerns , I believe there should be a PUBLIC INQUIRY, AS UNDER [ LICENSING] REGULATIONS 17 OF THE WATER ABSTRACTION AND IMPOUNDMENT [LICENSING] REGULATIONS [NORTHERN IRELAND 2006, The Department has the power to order a PUBLIC INQUIRY for the purpose of evaluating representation made as a result of a public consultation exercise.

I WISH TO OBJECT STRONGLY to the issuing of a MARINE CONSTRUCTION LICENCE as per the PUBLIC CONSULTATION for the following reasons.

1 Man – induced Subsidence ,

2 Top injection method.

3 Hydraulic FACTURING.

4 PROVIDE INFORMATION ON FAILURE RATES for underground GAS CAVERNS. [rr671]

5 provide written proof of all H. S. E. Reports submitted and by whom AND DATES RECEIVED.

6 provide existing records of Consequences of CAVERN FAILURE. BY WHOM AND DATES RECEIVED.

7 provide existing reports submitted , Dose the site provide STRATA DEEP ENOUGH FOR SAFE AND ECONOMICALLY , STORAGE FOR HIGH PRESSURE.

8 SHOW Proof, of the thickness and sections extent of the SALT BEDS.

9 SHOW PROOF, PRESENCE AND NATURE DISTRUBUTION/ THICKNESS/ OF NON SALT BEDS. YOU HAVE ON FILE.

10 SHOW PRESENTS AND NATURE OF MORE SOLUABLE EVAPORITE BEDS, THAT HAS BEEN SUBMITTED.

11 SHOW EXISTING GEOLOGICAL STRUCTURE YOU HAVE, INCLUDING THE LIKELY PRESENCE OF FAULTING.

12 SHOW UPDATE INFOTMATION RECEIVED OF FAILURE RATES TO PIPEWORK ABOVE GROUND .

13 SHOW PROOF OF CONSULTATION SUBMITTED , SHOWING THE SLOWEST MIGATION [ BY CAPILLARY ACTION ] AS IT IS ALWAYS PRESENT.

14 SHOW EXISTING REPORTS YOU HAVE, ON THE IMPLICATIONS THAT LOSSES OR FLUX MUST BE HIGHER IF OTHER MIGATION POUTES ARE PRESENT.

15 PROVE AND SHOW EXISTING REPORTS YOU HAVE PROVING THERE IS NO HYDROCARBON MIGRATION THROUGH, FAULTS, MICRO FRACTURES, AND PORE SPACES IN ALL 7 CAVERNS.

16 provide what you have on file and by whom , proof of size/ volume of each cavern distance apart / between / DEPTH. SEE Q 1 ABOVE

Kind regards

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** RE: Additional information regarding Islandmagee Gas Storage application ML 28\_12  
**Date:** 25 February 2020 17:13:49  
**Attachments:** [image001.png](#)

---

Thank you,

Just an observation that I require no feedback on thank you, I find it astounding that the Dept can be used and quoted so flippantly by this "Organisation" their Directors and Investors numerous times, with no recompense. Totally and utterly unprofessional at every single interaction.

Thank you again for your mail and feedback, which I do appreciate.

Have a good evening.

Kindest Regards

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** DAERA Marine Licensing Team [mailto:[REDACTED]]  
**Sent:** 25 February 2020 17:01  
**To:** [REDACTED]  
**Subject:** RE: Additional information regarding Islandmagee Gas Storage application ML 28\_12  
[REDACTED]

As the department as previously stated there is no pre determination.

Marine Licensing Team

---

**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 21 February 2020 11:47  
**To:** DAERA Marine Licensing Team  
**Subject:** RE: Additional information regarding Islandmagee Gas Storage application ML 28\_12

Just to add to this, as there is an implication here of pre determination.

Kindest Regards

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 21 February 2020 10:42  
**To:** 'DAERA Marine Licensing Team'  
**Subject:** RE: Additional information regarding Islandmagee Gas Storage application ML 28\_12  
Morning,

Can you shed any light on the speculation that I am reading about the info session that was held at the Gobbins last night please. Why is it that DAERA's name is constantly in commentary from Infrastrata stating that the dept " Fully Support the Science" and can see what a " Great project this is"?

I am getting increasingly frustrated that they can happily use the Depts name without any feedback, it does make me very uneasy with the whole process and governance.

Kindest Regards

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** DAERA Marine Licensing Team [mailto:[REDACTED]]

**Sent:** 18 February 2020 15:30

**Subject:** (Possible Spam)Additional information regarding Islandmagee Gas Storage application ML 28\_12

Dear Sir/Madam,

Following on from the email you received today advising you of the extended consultation period for the Islandmagee Gas Storage project, ML 28\_12, I wish to draw your attention to the following detail:

- The consultation will now expire on Friday 27 March 2020 at 17.00; and
- The addition of the HR Wallingford 3rd part audit of Brine Dispersion Model (consultation item 15 – see link below)

<https://www.daera-ni.gov.uk/consultations/islandmagee-gas-storage-project-december-2019-consultation-ml-2812>

For those of you who have emailed on behalf of other members of the public, please pass this information on.

**Kind Regards**

Marine Licensing Team

-----  
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**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: Islandmagee Energy Limited – Marine Licence: ML 28\_12  
**Date:** 25 February 2020 20:47:34

---

Hi [REDACTED]

Thanks for your reply and assistance. My address:

[REDACTED]

Regards,

[REDACTED]

Get [Outlook for Android](#)

---

**From:** DAERA Marine Licensing Team <[REDACTED]>  
**Sent:** Tuesday, February 25, 2020 5:08:55 PM  
**To:** [REDACTED] <[REDACTED]>  
**Subject:** RE: Islandmagee Energy Limited – Marine Licence: ML 28\_12

[REDACTED]

The document is too large to email.  
Please provide a postal address and we will send a copy to you.

[REDACTED]

---

**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 19 February 2020 18:37  
**To:** DAERA Marine Licensing Team <[REDACTED]>  
**Subject:** Islandmagee Energy Limited – Marine Licence: ML 28\_12

I refer to the above and would be obliged to receive a copy of the original 2012 Marine Licence Application document. As the Public Consultation for this project closes on 27<sup>th</sup> March, I would be grateful if this could be sent via email as soon as possible.

In the event that this request falls within the parameters of a Freedom of Information request, kindly treat this email in accordance with the Freedom of Information Act 2000.

Regards,

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Cc:** [REDACTED]  
**Subject:** FW: Additional information regarding Islandmagee Gas Storage application ML 28\_12  
**Date:** 26 February 2020 14:34:55  
**Attachments:** [f1783b4e-2450-47d3-bdb1-86b2be0f7134.png](#)

---

Dear Sirs

Further to your query below we would advise that the references within the HR Wallingford report to a borehole having been completed at the discharge site are incorrect and that the additional borehole they are referring to is actually the confirmation well drilled at the well pad. No other boreholes have been drilled in relation to the Islandmagee Gas Storage Facility.

Regards

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** DAERA Marine Licensing Team [[mailto:](#) [REDACTED]]  
**Sent:** 25 February 2020 17:15  
**To:** [REDACTED]  
**Subject:** FW: Additional information regarding Islandmagee Gas Storage application ML 28\_12

**CAUTION:** This email originated from outside of RPS.

Can you provide an answer for this query?

Marine Licensing Team

---

**From:** [REDACTED] [[mailto:](#) [REDACTED]]  
**Sent:** 19 February 2020 15:40  
**To:** DAERA Marine Licensing Team <[REDACTED]>  
**Subject:** Re: Additional information regarding Islandmagee Gas Storage application ML 28\_12  
Having read through the updated report from HR Wallingford I have notice that it states on two occasions:

"Since then a confirmation borehole has been completed at the discharge site".

When was this borehole drilled and how deep did it go.

What significance would this borehole serve.

Can you confirm the borehole previously drilled in Larne Lough at the "well pad" is NOT the borehole in question as it is not at the discharge point.

Thank you for the information supplied

[REDACTED]

---

**From:** DAERA Marine Licensing Team <[REDACTED]>  
**Sent:** 18 February 2020 15:30  
**Subject:** Additional information regarding Islandmagee Gas Storage application ML 28\_12

Dear Sir/Madam,

Following on from the email you received today advising you of the extended consultation period for the Islandmagee Gas Storage project, ML 28\_12, I wish to draw your attention to the following detail:

- The consultation will now expire on Friday 27 March 2020 at 17.00; and
- The addition of the HR Wallingford 3rd part audit of Brine Dispersion Model (consultation item 15 – see link below)

<https://www.daera-ni.gov.uk/consultations/islandmagee-gas-storage-project-december-2019-consultation-ml-2812>

For those of you who have emailed on behalf of other members of the public, please pass this information on.

**Kind Regards**

Marine Licensing Team



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12  
**Date:** 01 March 2020 03:15:47

---

To whom it may concern,

I wish to object to Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata and the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas. As a tourist to Islandmagee and a citizen concerned about global climate change, I would both hate to see the pollution and enabling of fossil fuel usage this project entails. By the Company's own admission, the development of the caverns would have a significant effect on local wildlife, discharging up to 1000 cubic metres of hypersaline brine per hour, 24 hours a day and 7 days a week for 4 years into the sea only 450 metres from the shore near Castle Robin, creating a benthic dead zone in a designated Special Area of Conservation for Harbour Porpoises, as well as affecting a number of nearby designated Areas of Specific Scientific Interest and proposed SPAs. Further species affected include otters, kittiwakes, razorbills, many crustaceans, and sand eels, the main food source for puffins, whose only breeding colony on the Northern Ireland mainland is directly adjacent to the discharge point. Furthermore, the creation of caverns filled with flammable gas under pressure nearby risks creating a major catastrophe. There have been recent earthquakes near to the proposed site, as well as subsidence and sinkholes. Even if this caused no ground issues, there is still the very risky proposition of siting high-pressure flammable gas – not only has methane natural gas been proposed but there is talk of using them for hydrogen storage – near to the population centres of Larne and Whitehead. I worry about the safety of my family nearby.

I hope you will examine these issues and concerns and listen appropriately to the many voices opposed to this project.

Best,

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** 20200302-Islandmagee Gas Storage project, ML 28\_12-Location of structures, works and caverns.  
**Date:** 02 March 2020 11:03:09

---

Good Morning,

Location Coordinates

I have been looking through the various documents made available and have been struck by the lack of (or conflicting) details on the physical locations of the proposed project; can you therefor please provide:

1. X, Y and Z Coordinates for all structures and constructions (temporary and permanent), in an industry standard format (rather than several different formats or in some cases no location details).
2. Chart or Map/Ordnance datums for the location coordinates.
3. For each map/chart/aerial (google) photo:
  - a. A standardised scale.
  - b. A north pointer, with details of the current magnetic variation and estimated drift throughout the life of project.

Pipeline Designs

In addition to the Location Coordinates for the Pipeline from the wellhead above the caverns to the outfall, please provide design details and proposed method statements, with particular reference to mitigation measures to eliminate environmental damage for the:

1. Thrust Blocks, including calculations.
2. Methods of anchoring when submerged.

Yours Sincerely

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** FW: ML28-12 Islandmagee Gas Storage Project  
**Date:** 02 March 2020 21:32:53

---

To Whom it may Concern,

Thank you for, what I assume is an automated response to my query. My request for information should have been treated as a request for information under the Environmental Information Regulations. As my request was originally made on 4th February, I should receive a response no later than 3rd March.

However, I have reviewed the voluminous application documents available on the website. I note the following:

The application fails to include, the following information:

- A scaled extract from an Ordnance Survey Map which shows the full extent of the works in relation to the surrounding area – the application documents repeatedly state that the location of the caverns is not yet known and furthermore, it states at page 16 of the application document, that some caverns may be located outside the high water mark;
- Latitude and longitude or 6 figure IGR co-ordinates defining the area of operation – the applicant states at page 12 “The IGR for the individual caverns will be determined during the detailed design phase of the project and consequently is not yet available..”
- A scaled extract from an Ordnance Survey Map which shows the mean high water springs; and
- A scaled extract from an Ordnance Survey Map which shows any adjacent Special Areas of Conservation, Area of Special Scientific Interest; Special Protection Area/ RAMSAR or similar conservation area boundary.

I note from the explanatory notes which accompany the application that the information referred to above should have been provided as part of the application.

The application is accompanied by a very vague plan which doesn't show a North indicator nor does it label any highways or landmarks, it certainly does not meet the requirements set out in the explanatory notes.

The advertisement does not contain a detailed description of the location of the works.

The Environmental Information also does not contain any detailed drawings or cross sections of the works.

Please confirm whether the Department holds such drawings and plans in accordance with the Environmental Information Regulations. If the Department does not hold such drawings or plans, I cannot see how the Department can understand what is proposed or in the event that consent is granted, ascertain whether the works have been carried out in accordance with the consent.

I am aware that the Department, in carrying out a consultation exercise, is required to



comply with certain public law principles established by the Gunning Case. In particular, members of the public must be provided with sufficient information to give intelligent consideration to the proposal and be given adequate time to respond. In the absence of copies of the detailed drawings and location plans, I cannot assess the application and make representations on it.

I reserve the right to submit further representations, six weeks beginning on the date on which I receive the information requested, as this is an "adequate time to respond".

Yours faithfully,

[REDACTED]

**From:** DAERA Marine Licensing Team <[REDACTED]>  
**To:** [REDACTED] <[REDACTED]>  
**Sent:** Thursday, 6 February 2020, 15:15:55 GMT  
**Subject:** RE: ML28-12 Islandmagee Gas Storage Project

Thank you for the response to the consultation. We are currently collating responses from the consultation and are not in a position to respond individually at this time. A summary will be produced in due course.

Marine Licensing Team

**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 04 February 2020 11:30  
**To:** [REDACTED] <[REDACTED]> DAERA Marine Licensing Team <[REDACTED]>  
**Subject:** Re: ML28-12 Islandmagee Gas Storage Project

To whom it may concern,

I would like to ask if your department have been furnished with a complete set of scaled working drawings for the above project including the position of each cavern as per page 16 of the updated application?

I would also like to request copies of consultation responses received from HSENI and GSNI.

I would be grateful if the above information could be provided as soon as possible.

Kind regards,

On 7 Oct 2019 2:13 pm, [REDACTED] wrote:

With reference to the above project I would like to highlight some concerns in relation to recent developments and the information Infrastrata are providing through their RNS updates and recent media coverage.

A notice was posted on the company website over the weekend stating that the next public information session (which was due to occur on Monday 14th October) has been postponed, and the next open day will be held prior to the 42 day Public Consultation period.

The company have been suggesting in recent RNS updates that they expect to announce dates for public consultation during Q4 2019. There have also been suggestions (since the company have agreed to purchase Harland & Wolff) that fabrication work for the Islandmagee project could begin in November 2019 and they hope to begin construction on-site in Islandmagee in 2020 (see attached)

These statements along with the project timelines which the company are suggesting are conflicting to the belief that there is still a lot of work to be carried out in relation to the Marine Licence Abstraction/Discharge Consents.

There is growing concern amongst those opposed to the gas storage project that the approval of the Marine License is already a "done deal" based on the presumptuous statements being purported by the company.

I would be grateful if your department could provide some clarification around these issues as people are very concerned about the situation that is unfolding.

Kind regards,

[REDACTED]

On 25 Jul 2019 8:45 am, [REDACTED] wrote:

With reference to the above project I would like to seek clarification regarding the scope of the full Marine License.

When I met with your department representative at the previous public information day in

Islandmagee I told her that along with the disposal of brine off Skernoghan Point I was also concerned about the potential impact in the Larne Lough area should anything go wrong.

The response I was given was that the intake and outlet points were at the other end of the Island and how could anything be affected in the lough?

I was somewhat surprised to hear this response and was given the impression that the marine license is only focused on the intake and outflow of seawater and brine at Skernoghan Point.

Considering that HSENI have classed the development as a "major hazard installation", I would have expected any potential impacts posed to the Lough to be considered as part of the Marine License approval process.

There are a number of potential risks posed to the area above/around the caverns during construction, operational lifetime and after abandonment which I feel need to be considered as part of the Full Marine License approval.

I would be grateful if this issue could be clarified at your earliest convenience.

Kind regards,

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: 20200302-Islandmagee Gas Storage project, ML 28\_12-Location of structures, works and caverns.  
**Date:** 02 March 2020 22:04:46

---

Good Evening,

Reference: My email to DAERA 02 Mar 2020 at 11:03

Thank you for, what I assume is an automated response to my query.

My request for information should have been treated as an RFI (Request For Information) under the Environmental Information Regulations. As my request was originally made on 2 March, I should receive a response no later than 30 March.

However, I have reviewed the voluminous application documents available on the website. I note the following:

The application fails to include, the following information:

- A scaled extract from an Ordnance Survey Map which shows the full extent of the works in relation to the surrounding area – the application documents repeatedly state that the location of the caverns is not yet known and furthermore, it states at page 16 of the application document, that some caverns may be located outside the high water mark;
- Latitude and longitude or 6 figure IGR co-ordinates defining the area of operation – the applicant states at page 12 “The IGR for the individual caverns will be determined during the detailed design phase of the project and consequently is not yet available..”
- A scaled extract from an Ordnance Survey Map which shows the mean high water springs; and
- A scaled extract from an Ordnance Survey Map which shows any adjacent Special Areas of Conservation, Area of Special Scientific Interest; Special Protection Area/ RAMSAR or similar conservation area boundary.

I note from the explanatory notes which accompany the application that the information referred to above should have been provided as part of the application.

The application is accompanied by a very vague plan which doesn't show a North indicator nor does it label any highways or landmarks, it certainly does not meet the requirements set out in the explanatory notes.

The advertisement does not contain a detailed description of the location of the works.

The Environmental Information also does not contain any detailed drawings or cross sections of the works.

Please confirm whether the Department holds such drawings and plans in accordance with the Environmental Information Regulations. If the Department does not hold such drawings or plans, I cannot see how the Department can understand what is proposed or in the event that consent is granted, ascertain whether the works have been carried out in accordance with the consent.

I am aware that the Department, in carrying out a consultation exercise, is required to comply with certain public law principles established by the Gunning Case. In particular, members of the public must be provided with sufficient information to give intelligent consideration to the proposal and be given adequate time to respond. In the absence of copies of the detailed drawings and location plans, I cannot assess the application and make representations on it.

I reserve the right to submit further representations, six weeks beginning on the date on which I receive the information requested, as this is an “adequate time to respond”.

Yours sincerely,

On Mon, 2 Mar 2020 at 15:17, DAERA Marine Licensing Team

<[REDACTED]> wrote:

Thank you for your response to the consultation.

We are not in a position to answer specific questions to individuals at present. A summary of responses will be issued in due course.

Marine Licensing Team

**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 02 March 2020 11:03  
**To:** DAERA Marine Licensing Team <[REDACTED]>  
**Subject:** 20200302-Islandmagee Gas Storage project, ML 28\_12-Location of structures, works and caverns.

Good Morning,

#### Location Coordinates

I have been looking through the various documents made available and have been struck by the lack of (or conflicting) details on the physical locations of the proposed project; can you therefore please provide:

1. X, Y and Z Coordinates for all structures and constructions (temporary and permanent), in an industry standard format (rather than several different formats or in some cases no location details).
2. Chart or Map/Ordnance datums for the location coordinates.
3. For each map/chart/aerial (google) photo:
  - a. A standardised scale.
  - b. A north pointer, with details of the current magnetic variation and estimated drift throughout the life of project.

#### Pipeline Designs

In addition to the Location Coordinates for the Pipeline from the wellhead above the caverns to the outfall, please provide design details and proposed method statements, with particular reference to mitigation measures to eliminate environmental damage for the:

1. Thrust Blocks, including calculations.
2. Methods of anchoring when submerged.

Yours Sincerely



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** RE: Islandmagee Gas Caverns  
**Date:** 03 March 2020 19:22:27

---

Dear Sir / Madam,

Thank you for the response to my query. My request for information should have been treated as a request for information under the Environmental Information Regulations. As my request was originally made on 2nd March, I should receive a response no later than [30th March](#).

However, I have reviewed the voluminous application documents available on the website. I note the following:

The application fails to include, the following information:

- A scaled extract from an Ordnance Survey Map which shows the full extent of the works in relation to the surrounding area – the application documents repeatedly state that the location of the caverns is not yet known and furthermore, it states at page 16 of the application document, that some caverns may be located outside the high water mark;
- Latitude and longitude or 6 figure IGR co-ordinates defining the area of operation – the applicant states at page 12 “The IGR for the individual caverns will be determined during the detailed design phase of the project and consequently is not yet available..”
- A scaled extract from an Ordnance Survey Map which shows the mean high water springs; and
- A scaled extract from an Ordnance Survey Map which shows any adjacent Special Areas of Conservation, Area of Special Scientific Interest; Special Protection Area/ RAMSAR or similar conservation area boundary.

I note from the explanatory notes which accompany the application that the information referred to above should have been provided as part of the application.

The application is accompanied by a very vague plan which doesn't show a North indicator nor does it label any highways or landmarks, it certainly does not meet the requirements set out in the explanatory notes.

The advertisement does not contain a detailed description of the location of the works.

The Environmental Information also does not contain any detailed drawings or cross sections of the works.

Please confirm whether the Department holds such drawings and plans in accordance with the Environmental Information Regulations. If the Department does not hold such drawings or plans, I cannot see how the Department can understand what is proposed or in the event that consent is granted, ascertain whether the works have been carried out in accordance with the consent.

I am aware that the Department, in carrying out a consultation exercise, is required to comply with certain public law principles established by the Gunning Case. In particular, members of the public must be provided with sufficient information to give intelligent consideration to the proposal and be given adequate time to respond. In the absence of copies of the detailed drawings and location plans, I cannot assess the application and make representations on it.

I reserve the right to submit further representations, six weeks beginning on the date on which I receive the information requested, as this is an “adequate time to respond”.

Sincerely,

[REDACTED]

Sent from [Mail](#) for Windows 10

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**From:** DAERA Marine Licensing Team <[REDACTED]>  
**Sent:** Monday, March 2, 2020 3:19:37 PM  
**To:** [REDACTED] <[REDACTED]>  
**Subject:** RE: Islandmagee Gas Caverns

Thank you for your response to the consultation.  
We are not in a position to answer specific questions to individuals at present. A summary of responses will be issued in due course. Information on protected sites can be found on the Marine Map Viewer <https://apps.d.era-ni.gov.uk/marinemapviewer/>  
Marine Licensing Team

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**From:** [REDACTED] mailto:[REDACTED]  
**Sent:** 01 March 2020 11:24  
**To:** DAERA Marine Licensing Team <[REDACTED]>  
**Subject:** Islandmagee Gas Caverns

Please find attached letter of objection.

Regards

[REDACTED]

Sent from [Mail](#) for Windows 10



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas Storage Project December 2019 Consultation ML 28\_12  
**Date:** 05 March 2020 10:28:44  
**Attachments:** [image002.png](#)

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Hi Folks

This may appear churlish, but, I note that under item 11, App D Benthic Survey Report, (<https://www.daera-ni.gov.uk/sites/default/files/consultations/daera/app-d-benthic-survey-report.pdf>) RPS claim on page 20 that:

“Identifications were carried out by Thomson Ecology (a company which have been implementing the NMBAQC scheme for marine invertebrate identification on behalf of its committee since its inception in 1994). Here the samples were identified to species level, where possible, counted and logged.”

Implying an unimpeachable level of quality and not alluding to any external QA of the data (10% QA is recommended).

However, having sat as a committee member, acted as technical secretary and chaired the NMBAQC for various periods since its inception that that claim is misleading.

Thompson Ecology acquired Unicomarine in late 2010, the company that had run the scheme since its inception. Thomson Ecology were administering the Invertebrates/PSA/Fish components up until end March 2014 and continued to run only the Fish component only, up until June 2019. At the time of this report they were not running the Invertebrate or PSA components and had not done for some time.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 04 March 2020 11:44  
**To:** DAERA Informationmanager <[REDACTED]>  
**Subject:** FW: ML28-12 Islandmagee Gas Storage Project

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**From:** [REDACTED]  
**Sent:** 04 March 2020 11:39  
**To:** DAERA EMFG Information Requests <[REDACTED]>  
[REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** FW: ML28-12 Islandmagee Gas Storage Project

Could you please advise on how we should proceed?  
Thank you, [REDACTED]

---

**From:** [REDACTED]  
[REDACTED] 10:28  
**To:** [REDACTED]  
Beer, [REDACTED]  
**Cc:** DAERA Marine Licensing Team <[REDACTED]>  
**Subject:** FW: ML28-12 Islandmagee Gas Storage Project

[REDACTED]  
See below. My initial thoughts are that the original e-mail was treated as a consultation response since it was sent to the Marine Licensing mail box during the ML28-12 consultation. There is no indication in the e-mail of 6<sup>th</sup> February that this was to be treated as an FOI. My suggestion is that this e-mail is registered with [REDACTED]'s team as an FOI request and his specific points can be addressed in the FOI response. The issue around 6 weeks adequate response time will need careful consideration since we are probably not in a position to extend the consultation again.

With regards to his request for consultation responses from other Government Departments, can we have advice from [REDACTED] as to whether or not this fall within EIR given the fact the consultation is currently live. It may simply be a case of directing [REDACTED] to HSENI and GSNI directly to request that information.

---

**From:** DAERA Marine Licensing Team  
**Sent:** 04 March 2020 10:00  
**To:** [REDACTED] <[REDACTED]>  
**Subject:** FW: ML28-12 Islandmagee Gas Storage Project

How do you want this handled?

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**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 02 March 2020 21:33  
**To:** DAERA Marine Licensing Team <[REDACTED]>  
**Subject:** FW: ML28-12 Islandmagee Gas Storage Project

To Whom it may Concern,

Thank you for, what I assume is an automated response to my query. My request for information should have been treated as a request for information under the Environmental Information Regulations. As my request was originally made on 4th February, I should receive a response no later than 3rd March.

However, I have reviewed the voluminous application documents available on the website. I note the following:

The application fails to include, the following information:

- A scaled extract from an Ordnance Survey Map which shows the full extent of the works in relation to the surrounding area – the application documents repeatedly state that the location of the caverns is not yet known and furthermore, it states at page 16 of the application document, that some caverns may be located outside the high water mark;
- Latitude and longitude or 6 figure IGR co-ordinates defining the area of operation – the applicant states at page 12 “The IGR for the individual caverns will be determined during the detailed design phase of the project and consequently is not yet available..”
- A scaled extract from an Ordnance Survey Map which shows the mean high water springs; and
- A scaled extract from an Ordnance Survey Map which shows any adjacent Special Areas of Conservation, Area of Special Scientific Interest; Special Protection Area/ RAMSAR or similar conservation area boundary.

I note from the explanatory notes which accompany the application that the information referred to above should have been provided as part of the application.

The application is accompanied by a very vague plan which doesn't show a North indicator nor does it label any highways or landmarks, it certainly does not meet the requirements set out in the explanatory notes.

The advertisement does not contain a detailed description of the location of the works.

The Environmental Information also does not contain any detailed drawings or cross sections of the works.

Please confirm whether the Department holds such drawings and plans in accordance with the Environmental Information Regulations. If the Department does not hold such drawings or plans, I cannot see how the Department can understand what is proposed or in

the event that consent is granted, ascertain whether the works have been carried out in accordance with the consent.

I am aware that the Department, in carrying out a consultation exercise, is required to comply with certain public law principles established by the Gunning Case. In particular, members of the public must be provided with sufficient information to give intelligent consideration to the proposal and be given adequate time to respond. In the absence of copies of the detailed drawings and location plans, I cannot assess the application and make representations on it.

I reserve the right to submit further representations, six weeks beginning on the date on which I receive the information requested, as this is an "adequate time to respond".

Yours faithfully,

[REDACTED]

**From:** DAERA Marine Licensing Team <[REDACTED]>  
**To:** [REDACTED] <[REDACTED]>  
**Sent:** Thursday, 6 February 2020, 15:15:55 GMT  
**Subject:** RE: ML28-12 Islandmagee Gas Storage Project

Thank you for the response to the consultation. We are currently collating responses from the consultation and are not in a position to respond individually at this time. A summary will be produced in due course.

Marine Licensing Team

**From:** [REDACTED] [[mailto:\[REDACTED\]](mailto:[REDACTED])]  
**Sent:** 04 February 2020 11:30  
**To:** [REDACTED] DAERA Marine Licensing Team <[REDACTED]>  
**Subject:** Re: ML28-12 Islandmagee Gas Storage Project

To whom it may concern,

I would like to ask if your department have been furnished with a complete set of scaled working drawings for the above project including the position of each cavern as per page 16 of the updated application?

I would also like to request copies of consultation responses received from HSENI and GSNI.

I would be grateful if the above information could be provided as soon as possible.

Kind regards,

[REDACTED]

On 7 Oct 2019 2:13 pm, [REDACTED] wrote:

With reference to the above project I would like to highlight some concerns in relation to recent developments and the information Infrastrata are providing through their RNS updates and recent media coverage.

A notice was posted on the company website over the weekend stating that the next public information session (which was due to occur on Monday 14th October) has been postponed, and the next open day will be held prior to the 42 day Public Consultation period.

The company have been suggesting in recent RNS updates that they expect to announce dates for public consultation during Q4 2019. There have also been suggestions (since the company have agreed to purchase Harland & Wolff) that fabrication work for the Islandmagee project could begin in November 2019 and they hope to begin construction on-site in Islandmagee in 2020 (see attached)

These statements along with the project timelines which the company are suggesting are conflicting to the belief that there is still a lot of work to be carried out in relation to the Marine Licence Abstraction/Discharge Consents.

There is growing concern amongst those opposed to the gas storage project that the approval of the Marine License is already a "done deal" based on the presumptuous statements being purported by the company.

I would be grateful if your department could provide some clarification around these issues as people are very concerned about the situation that is unfolding.

Kind regards,

[REDACTED]

On 25 Jul 2019 8:45 am, [REDACTED] wrote:

With reference to the above project I would like to seek clarification regarding the scope of the

full Marine License.

When I met with your department representative at the previous public information day in Islandmagee I told her that along with the disposal of brine off Skernoghan Point I was also concerned about the potential impact in the Larne Lough area should anything go wrong.

The response I was given was that the intake and outlet points were at the other end of the Island and how could anything be affected in the lough?

I was somewhat surprised to hear this response and was given the impression that the marine license is only focused on the intake and outflow of seawater and brine at Skernoghan Point.

Considering that HSENI have classed the development as a "major hazard installation", I would have expected any potential impacts posed to the Lough to be considered as part of the Marine License approval process.

There are a number of potential risks posed to the area above/around the caverns during construction, operational lifetime and after abandonment which I feel need to be considered as part of the Full Marine License approval.

I would be grateful if this issue could be clarified at your earliest convenience.

Kind regards,

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** ML 28/12 Marine Licence Consultation Islandmagee Energy  
**Date:** 09 March 2020 13:26:17

---

Dear Sir/Madam

I wish to add further objections to my initial submission sent to you in February:-

I wish to have clarification on the following points and suggest you seek further information on them:-

The application does not include a chart, plan or map showing exactly where the caverns will be located as required by regulation 12 {1} of the Marine Works (EIA) regulation.

The application does not include a description, including a plan of the licensable elements of the projects.

Throughout the application and environmental information there are references to information being made available after a detailed design phase.

The application requests a licence for a ten year period yet the explanatory notes which accompany the application form state that licences will only be granted for the maximum of three years, the Department must therefore clarify if the licence will be granted for three years or for ten,

In addition the Environmental information which accompanies the application is spread over 6 separate documents. The non technical summary relates only to an environmental statement produced in 2010. There appears to be no updated, single composite environmental statement with an updated non technical summary. This is a paper chase and is contrary to the legal requirements for EIA>

And further I would like to point out that the Environmental information which accompanies the application, does not reflect or assess what is proposed in the application documents. By way of example I would state that the phrasing of the leaching of caverns is different,

As a result of the above made points I would like to state that the application is invalid and does not comply with the legal requirements of an environmental impact assessment.

In addition the consultation process is also flawed as there is insufficient information to make informed and reasoned comments.

I would be grateful if you could scrutinise these above points and progress this matter.

Many thanks

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Problems with the application for Islandmagee Gas Cavern suggested project  
**Date:** 09 March 2020 14:20:42

---

These PROCEDURAL ISSUES have come to my attention and I am very keen to know more. Please could I have the answers in writing as I would need to read them and consider them carefully.

- \* The application does not include a chart, plan or map showing exactly where the caverns will be located, as required by regulation 12(1) of the Marine Works (EIA) Regulations;
- \* The application does not include a description, including a plan of the licensable elements of the projects. Throughout the application and environmental information there are references to information being made available after a “detailed design phase”;
- \* The application requests a licence for a 10 year period, yet the explanatory notes which accompany the application form state that licences will only be granted for a maximum of 3 years, the Department must clarify if the licence will be granted for 3 or 10 years;
- \* The Environmental Information which accompanies the application is spread over six separate documents. The non-technical summary relates only to an Environmental Statement produced in 2010. There is no updated, single composite environmental statement with an updated non-technical summary. This is a paper chase and is contrary to the legal requirements for EIA;
- \* The Environmental Information which accompanies the application, does not reflect or assess what is proposed in the application documents. For example the phasing of the leaching of caverns is different;
- \* **For these reasons the application is invalid and does not comply with the legal requirements of an environmental impact assessment;**
- \* *The consultation process is also flawed as there is insufficient information to make informed and reasoned comments. **The consultation process has been difficult to use as the PR man has made me nervous to even attend and ask questions.***

Regards

[REDACTED]



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Cc:** [REDACTED]  
**Subject:** Islandmagee Gas Storage Project - Consultation ML 28\_12,  
**Date:** 09 March 2020 15:11:59

---

I have written to you before, however, I became aware of the following issues today only. Please, be so kind and address each of them, for the sake of current and future generations of all life here.

#### PROCEDURAL ISSUES

- \* The application does not include a chart, plan or map showing exactly where the caverns will be located, as required by regulation 12(1) of the Marine Works (EIA) Regulations;
- \* The application does not include a description, including a plan of the licensable elements of the projects. Throughout the application and environmental information there are references to information being made available after a "detailed design phase";
- \* The application requests a licence for a 10 year period, yet the explanatory notes which accompany the application form state that licences will only be granted for a maximum of 3 years, the Department must clarify if the licence will be granted for 3 or 10 years;
- \* The Environmental Information which accompanies the application is spread over six separate documents. The non-technical summary relates only to an Environmental Statement produced in 2010. There is no updated, single composite environmental statement with an updated non-technical summary. This is a paper chase and is contrary to the legal requirements for EIA;
- \* The Environmental Information which accompanies the application, does not reflect or assess what is proposed in the application documents. For example the phasing of the leaching of caverns is different;
- \* For these reasons the application is invalid and does not comply with the legal requirements of an environmental impact assessment;
- \* The consultation process is also flawed as there is insufficient information to make informed and reasoned comments.

[REDACTED]

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas Storage Marine Licence Application  
**Date:** 09 March 2020 16:03:09  
**Attachments:** [image003.png](#)  
[image002.png](#)

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Dear [REDACTED]

Thank you for your email and enclosures of 28 February 2020.

I can confirm that my client is:

[REDACTED]

[REDACTED] part of this group and going forward will be represented by this group.

I note your comments in respect of the alleged failure to comply with the Judicial Review Practice Direction of 3/2018. Your email of 4 February 2019 sought to treat our consultation response dated 24 January 2020 as pre-application protocol correspondence. We did not ask that it be treated as a pre-action protocol letter, although clearly it raised important legal issues.

Our representation did raise serious errors in the consultation process, advertisement and application. In line with our client's legitimate expectation that the consultation process would be carried out in accordance with the Gunning Principles, it was, and is, open to the Department to take steps to remedy those defects prior to issuing a decision. However, any decision made on the basis of a flawed consultation process, would be amenable to Judicial Review.

I refer to the "Northern Ireland Guidance on Marine Licensing Overview and Process, Under Part 4 of the Marine and Coastal Access Act 2009" published in May 2016 by DAERA (hereinafter referred to as the "2016 Guidance"). Paragraph 3.4 of the 2016 Guidance states:

*"If Marine and Fisheries Division deems that the objection is valid then one of the following must result:*

- *The applicant makes changes to the proposal in line with the objection to the satisfaction of Marine and Fisheries Division;*
- *The applicant provides evidence that the objection is not relevant;*
- *The application is withdrawn;*
- *The objection is withdrawn for whatever reason.*

*The process of resolving issues raised by consultees and the public is often an iterative process....."*

Our client therefore has a legitimate expectation that its valid objections and concerns will be resolved through the consultation process.

On behalf of our clients I wish to make the following further points of objection which we ask that the Department consider and resolve through the consultation process in accordance with section 3.3 of the 2016 Guidance:

#### **Invalid Advertisement**

It is acknowledged that, in response to our previous submission, the consultation period has been extended and that an advertisement was placed in the Belfast Telegraph on 14 February. I note the following in respect of the advertisement:

- The description of the project in the advertisement does not match the description of the project as submitted in the application dated 16 December 2019.
- The website referred to in the advertisement contains a different description of the project.
- The description of the project appears to include an element of development not actually applied for the application dated 16 December 2019.
- The advertisement does not accurately identify where the proposed works will take place, the description of the location of the works is so general as to be meaningless, this is also reflected in the application itself.
- The advertisement does not refer at all to the Shadow Habitats Regulation Assessment.
- The advertisement does not refer to the Marine Works (Environmental Impact Assessment) Regulations 2007 as amended in 2017, but instead refers to the 2011 amendments only, I set out below the reasons why the 2017 Regulations are applicable in this case.

These matters should be remedied and the application re-advertised.

### **Invalid Application**

The application dated 16 December 2019 is invalid. The Marine EIA Regulations 2007 state:

*“12.—(1) Where an application is made for a regulatory approval in relation to a regulated activity to which this Part applies, neither the regulator nor the appropriate authority may deal with the application or exercise any functions under these Regulations in relation to it until the appropriate authority has received the following material from the applicant—*

- (a) a chart or map (or both) sufficient to identify where the regulated activity would be carried out and the extent of any operations which it would involve;*
- (b) a description (including a plan) of the nature of the project, identifying the regulated activity to be carried out in the course of that project;*
- (c) a statement of the working methods to be used in the course of the project and in carrying out the regulated activity;*
- (d) an environmental statement in respect of the project; and*
- (e) a copy of any environmental statement in respect of the project provided or to be provided to any other consenting authority.”*

The explanatory notes which accompany the application form also set out the requirements and information to be included in the application form.

#### *“6. Location of Works*

*Include a list of the latitude and longitude co-ordinates of the boundary points of the proposed project. In a few cases, (e.g. laying of long pipelines) it may only be practicable to supply co-ordinates for the start and end points.*

*Latitude and Longitude: For positions read from charts of 1:25,000 scale or smaller, the format should be e.g. 55° 55'.5N 20 22'.2W. The decimal point specifies that decimals of minutes are used and the datum is stated explicitly. If appropriate, map co-ordinates from the Irish Grid used by the Ordnance Survey Northern Ireland may be used, to a 6 figure grid reference.*

***It is important that the correct positions are included with this application, as any errors may result in the application being refused or delayed. (original emphasis)***

*To supplement the information given in section 6, Department of Agriculture, Environment and Rural Affairs (DAERA) Marine and Fisheries Division requires the following to be provided with the completed application form:*

- *A suitably scaled extract from an Ordnance Survey Map (1:2,500 scale but not more than 1:10,000) or Admiralty Chart which should be marked to indicate:
  - *The full extent of the works in relation to the surrounding area;*
  - *Latitude and longitude (or 6 figure IGR) co-ordinates defining the area of operation;*
  - *The level of Mean High Water Springs (MHWS)*
  - *Any adjacent Special Area of Conservation (SAC), Area of Special Scientific Interest (ASSI), Special Protection Area (SPA)/RAMSAR or similar conservation area boundary.**

*DAERA Marine and Fisheries Division will require copies of all documents to be provided for dissemination to others as part of the consultation process. Normally one copy of the maps/drawings will be required, if there are ancillary copies required, DAERA Marine and Fisheries Division will advise the applicant accordingly. If they are subject to copyright, it is the responsibility of the applicant to obtain necessary approvals to reproduce the documents and to submit suitably annotated copies with the application. Alternatively maps/drawings can be sent electronically by email.”*

The application fails to include, inter alia, the following information:

- *A scaled extract from an Ordnance Survey Map which shows the full extent of the works in relation to the surrounding area – the application documents repeatedly state that the location of the caverns are not yet known and furthermore, it states at page 16 of the application document, that some caverns may be located outside the high water mark. Such works cannot be consented by a Marine Licence and have not been consented by the planning application;*
- *Latitude and longitude or 6 figure IGR co-ordinates defining the area of operation – the applicant states at page 12 “The IGR for the individual caverns will be determined during the detailed design phase of the project and consequently is not yet available..”*
- *A scaled extract from an Ordnance Survey Map which shows the mean high water springs; and*
- *A scaled extract from an Ordnance Survey Map which shows any adjacent Special Areas of Conservation, Area of Special Scientific Interest; Special Protection Area/ RAMSAR or similar conservation area boundary.*

The application also fails to meet the requirements of the explanatory notes as identified below:

- Details of the permanent deposits as required by section 8 of the application;
- Details of the temporary deposits as required by section 9 of the application – it is noted that the values expressed for cuttings will be “confirmed during the detailed design phase, following ground investigation studies”, no specific deposit locations are provided;
- Throughout the application document there are references to information being provided following the “detailed design phase”, however, the applicant is seeking a licence for the entire works and not just the works up to the detailed design phase;
- Section 7 of the application sets out the requirements for the method statement. The applicant’s method statement does not meet these requirements.
- Sea Water Intake Design – page 7 of the application states: “*The detailed design of this facility has not yet been undertaken so it is not possible to describe exactly what this will entail*”. Page 8 of the application sets out that there are three potential options for the location and design of the pipeline routing from the pumphouse, across the foreshore, past the rocks and into the seabed.

It is not clear from the face of the application whether or not consent is sought for the actual use of the gas caverns once they are constructed. This is not expressly stated in the Marine Licence Application, although the advertisement does make reference to the end use. This inconsistency is confusing. This confusion is exacerbated by the absence of detailed drawings of the proposed location of the works and references throughout the application document of the need for a further, as yet incomplete, detailed design phase.

The absence of detailed application drawings and the continued references to further detailed design work means that it is impossible to ascertain what exactly is to be consented and where those works are to be located. In the absence of this information it is also impossible to assess the environmental effects of the works.

The October 2012 application, was also invalid as it does not meet the requirements of Regulation 12(1) and the guidance contained in the explanatory notes.

#### **Inconsistencies between the application and the environmental information provided**

The Application is also inconsistent with the environmental information submitted to accompany and support that application.

By way of example, the December 2019 application describes the development as “*construction by solution mining of seven underground caverns in the Permian salt strata approximately 1700m below Larne Lough...*”. The Non-Technical summary produced in 2010 describes the development as consisting of “*Seven caverns with a total gas storage capacity of approximately 500 million cubic metres are planned within a layer of Permian age salt, greater than 200 metres thick, located approximately 1,400 metres beneath Larne Lough.*” The Environmental Statement dated March 2010 describes them as being “*1500m below the surface*”. The Shadow Habitats Regulations Assessment and the Environmental Conditions update describes the caverns as being “*1350m below sea level*”.

The shadow Habitats Assessment refers to a total capacity of 400 million cubic metres, whereas the Environmental Conditions update refers to a capacity of 500 million cubic metres. The application is itself silent as to the capacity of the caverns.

The application, which incorporates a Construction Method Statement (CMS) and Cavern Design and Methodology, is also inconsistent with the information contained within the Environmental Statement, Further Environmental Information and Shadow Habitats Regulation which the Department now seeks to rely upon. For example, the Marine Feed design as described in the Marine Environment Update document is also different to that set out in the application. The Shadow Habitats Regulation Assessment sets out a different description. The Environmental Statement of March 2010 sets out very limited details of this element of the development.

The design for both the brine outfall pipeline and the intake pipe as described in the CMS does not match that which is assessed in the Marine Environmental Conditions Update and subsequently considered within the shadow HRA. In respect of the brine outfall pipeline, the CMS states that “*The HDD is expected to break the seabed surface at a distance of some 300-350m offshore with the remaining 100-150m of outfall laid on the seabed with rock mound protection*”. The Marine Environmental Conditions Update and the original ES, it is consistently stated that the HDD will break out at, or close to, the outfall point. The shadow HRA states that the pipe section will only be approximately 40m in length. The environmental impacts of the application have not therefore been assessed.

For the intake pipe, three different construction methods are proposed within the CMS. Two of these methods are similar to what is assessed within the other documents but the third option represents a very different approach. It involves “*a section of pipe running above ground and pinned to the rocks with a pipe length on the seabed secured with concrete saddles*”, and has not been assessed for potential impacts in the documentation. This method would significantly increase the direct take footprint of the seabed and the differing construction methods have the potential to result in significantly different impacts to the marine environment than the others presented.

The phasing of the cavern construction varies across the documentation. This is significant in that the phasing of the

construction directly impacts issues such as noise and brine modelling.

Section 5(b) of the application form states: "*Caverns will be leached in two distinct phases of two caverns first, with the further caverns as a second phase*". However, this is not what has been assessed in the Environmental Statements or what is set out in the Construction Method Statement.

*"It is planned to leach three caverns in parallel during a first phase and additional three caverns during a second phase respectively, the resulting average maximum leaching rate will be 300 m<sup>3</sup>/h. In addition, one cavern will be leached during downtimes during leaching operations of both phases."* (CMS pages 14 and 15)

*"Caverns 1, 2 and 3 will be leached more or less in parallel during the first phase and caverns 5, 6 and 7 during the second leaching phase. The leaching process for each cavern is anticipated to take approximately 22 months, including downtime required for work-overs, blanket adjustments and sonar surveys. Cavern 4 will be leached during down-times during the leaching operations of all other caverns. A period of approximately 3 ½ years is estimated to be required for the (slower) leaching of this cavern. In total, the completion of the leaching operations of all 7 caverns is expected to last approximately 4 years."* (CMS page 19)

*"while leaching up to three caverns in parallel"* (CMS page 19)

The 2019 Environmental Conditions Update is similarly inconsistent in that refers to the caverns being "*sequentially formed*" in several places throughout the document and elsewhere stating that "*the rate of discharge will increase in stages as the number of caverns under construction increases with time*".

Meanwhile the 2010 EIS states:

*"The leaching rate will be between 100 and 300 m<sup>3</sup>/h per cavern, but as the caverns are phased the overall process will result in a maximum total flow of 1,000m<sup>3</sup>/h for parallel operation of 4 caverns (Figure 4.11)."* (page 4-53 EIS 2010)

*"Each cavern is anticipated to take approximately 22 months to leach, with up to four caverns being leached concurrently."* (page 4-55 EIS 2010)

Whereas the Brine Modelling appended to the 2010 EIS states:

*"The possibility to leach three caverns in parallel for most of the time in two phases is assumed. The resulting average maximum leaching rate per cavern is expected to be 300 m<sup>3</sup>/h. An additional cavern will be leached during workovers on the caverns being leached"* (Appendix 4 EIS)

*"The leaching of a single cavern takes a duration of approximately two to three years."* (Appendix 4 EIS)

The Brine Dispersion Modelling Report, which is appended to the Updated Environmental Conditions, report notably does not contain a description of the phasing of the project and in particular the phasing of the construction of the caverns. It is not clear whether it has assumed that two caverns will be constructed first with the remaining caverns constructed in a subsequent phase as set out in the application. In the alternative it may assume that a maximum of either 3 or 4 caverns will be constructed simultaneously. A further option is that it may assume that caverns will be constructed sequentially as set out in the Updated Environmental Conditions Report.

The Shadow Habitats Regulation Assessment appears to be based on the premise that the first phase will consist of two caverns and the second phase will consist of the remainder of the caverns. However, the Shadow Habitats Regulation Assessment relies upon data included within the EIS, the Updated Environmental Conditions Report and the updated brine dispersal modelling report, which as stated above are inconsistent with the application and inconsistent with each other.

There is no explanation in any of the recent documentation why it is assumed that the maximum rate of brine discharge will be 1000m<sup>3</sup>/ hour at the maximum "construction rate" regardless of whether that maximum rate of construction is 3 caverns as stated in some documents or 4 caverns in other documents and an indication in yet other documents that it could be maximum of 5 caverns.

In summary, it is clear that the development applied for has not been assessed either under the Environmental Impact Assessment Regulations or under the Habitats Regulations.

These inconsistencies highlight the difficulties of requiring a member of the public to conduct a "paper chase" to ascertain the potential environmental impacts of the proposed development.

In light of the fact that the various documents containing environmental information are inconsistent in the project description and those descriptions are not reflected in the Marine Licence Application, the Department cannot be confident that the environmental impacts of the development applied for have in fact been assessed.

### **Incomplete Environmental Information**

We are aware of the existence of a further report by HR Wallingford which the Department holds and has not yet been released to members of the public. We are also aware that the Department holds all the input data used for the brine

dispersion modelling. This environmental information has also not been published.

### **Habitats Regulation Assessment**

Members of the public have a legitimate expectation that they will be expressly consulted on the contents of the Shadow Habitats Regulation Assessment in accordance with regulation 43(4) of the Habitats Regulations as amended. The failure to expressly invite views from members of the public on the Shadow Habitats Regulation Assessment is in breach of this legitimate expectation.

The insufficient nature of the information provided in the application documents, the shadow Habitats Regulations Assessment (HRA) submitted by the applicant cannot be used to assert that there will be no significant impacts on the designated sites.

We echo the RSPB's serious concerns about the updated (2019) bird surveys provided by the applicant and believe that they are of extremely limited value in determining whether there are important bird foraging areas in the vicinity of the brine outfall. While we recognise that, for the most part, a standard methodology has been applied within the submitted 2019 bird surveys (i.e. vantage point surveys of 3 hours duration overlooking the brine outfall location and surrounding area), these surveys were not carried out at the appropriate time of year to obtain an accurate record of the usage of the site by foraging seabirds.

Additionally, previous surveys carried out for the site are now notably out of date and cannot be considered as a basis for determining whether the proposed discharge site is of importance to foraging seabirds.

The applicant has not included Portmuck ASSI or The Gobbins ASSI into their assessment of impacts to designated sites. Both of these sites list breeding seabirds within their qualifying features and include razorbill, guillemot and kittiwake among others. Given the fact that both sites are functionally linked to the proposed discharge area. This is a major omission.

Table 7-2126 shows "minor (adverse)" impacts from brine discharge on a broad range of species including fish, plankton, shellfish and benthic subtidal habitat with no mitigation proposed for any of these. While these impacts are considered to be minor, the fact remains that this application will have adverse impacts on a huge range of species within two designated sites.

We consider that the proposal is contrary to The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended) as it has not been demonstrated that the proposed development would not adversely affect the designated sites. Under the Habitats Directive (92/43/EEC), which underpins The Conservation (Natural Habitats, etc.) Regulations (NI) 1995 (as amended), the precautionary principle states that where there are significant risks of damage to the environment, its protection will generally be paramount, unless there are imperative reasons of overriding public interest. Accordingly, given the lack of robust surveys and inability to draw reliable conclusions from same, the precautionary principle should be adopted in the absence of scientific clarity and the application rejected.

### **Gunning Principles**

Our clients have a legitimate expectation that the consultation exercise will be carried out in accordance with the Gunning Principles. A key principle is that the consultation be accompanied by sufficient information to allow a member of the public to give intelligent consideration of the proposal. The application as presented in the Department's consultation page does not include sufficient information to allow intelligent consideration of the proposal.

### **2017 EIA Regulations**

It is noted that your correspondence does not provide any substantive reasons as to why the Department has formed the view that the 2011 EIA Regulations are applicable in this case. Instead, the only hint of the Department's reasoning is that "*The Department remains content that its approach is the correct one having regard in particular to Regulation 34 of the Marine Works (Environmental Impact Assessment) (Amendment) Regulations 2017.*"

Regulation 34 states:

"*Transitional provisions*

34.—(1) *The amendments made by these Regulations to the 2007 Regulations do not apply in respect of—*

*(a) a screening opinion under regulation 11 of the 2007 Regulations, where the applicant in question has requested such an opinion under that regulation before 16th May 2017;*

*(b) an EIA consent decision, where the applicant in question has applied for such consent pursuant to regulation 12(1) of the 2007 Regulations before 16th May 2017; and*

*(c) an EIA consent decision, where the applicant in question has requested a scoping opinion under regulation 13 of the 2007 Regulations before 16th May 2017.*

*(2) In this regulation, "EIA consent decision" has the meaning given by regulation 2(1) of the 2007 Regulations."*

In the absence of any information, it is assumed that the Department seeks to rely on the fact that an application was made in October 2012.

It is our position that both the October 2012 application and the 2019 application do not meet the requirements set out in the Marine EIA Regulations and the Department's own guidance set out in the application explanatory notes.

The Marine EIA Regulations provide that:

*"12.—(1) Where an application is made for a regulatory approval in relation to a regulated activity to which this Part applies, neither the regulator nor the appropriate authority may deal with the application or exercise any functions under these Regulations in relation to it until the appropriate authority has received the following material from the applicant—*

*(a) a chart or map (or both) sufficient to identify where the regulated activity would be carried out and the extent of any operations which it would involve;*

*(b) a description (including a plan) of the nature of the project, identifying the regulated activity to be carried out in the course of that project;*

*(c) a statement of the working methods to be used in the course of the project and in carrying out the regulated activity;*

*(d) an environmental statement in respect of the project; and*

*(e) a copy of any environmental statement in respect of the project provided or to be provided to any other consenting authority."*

For the reasons set out elsewhere in this letter, the 2012 Application did not comply with the requirements a, b and c listed above. The applicant did submit a copy of the environmental statement provided to another consenting authority but did not submit a separate environmental statement in respect of the Marine Licence Application.

The 2012 Application was accompanied by an Environmental Impact Statement prepared in 2010 to support the planning application, a non-technical summary and an addendum to the Environmental Statement dated November 2011. Under Regulation 10(b) of the Marine EIA Regulations 2007, the Department is permitted to rely upon another authority's Environmental Impact Assessment where such assessment is sufficient to meet the requirements of the EIA Directive in relation to that project. However, the Department has determined that it will carry out its own Environmental Impact Assessment, and therefore, the Marine Licence Application must be accompanied, not only by the Environmental Statement provided to another consenting authority but a separate Environmental Statement produced for the purposes of the Marine Licence Application.

The Department's 2016 Guidance at paragraph 3.3 states:

*"The application will not be classed as formally submitted until all supporting documentation has been received and is adequate."*

The requirement for the environmental information to be adequate is also reflected in the explanatory notes which accompany the application form.

The Department requested Further Environmental Information in the course of its consideration of the 2012 Application and such information was contained in a third party review of the brine dispersion modelling carried out by HR Wallingford in April 2013. This document has not been placed in the public domain but constitutes environmental information for the purposes of the EIA Directive. The fact that the Department requested this third party audit is evidence that it did not consider that the environmental information submitted as part of the 2012 Application was adequate.

We have had sight of extensive correspondence between the applicant and Department, where the Department has made it very clear that it did not consider the environmental information submitted as part of the 2012 application to be adequate and therefore cannot have classed the 2012 application as formally submitted in accordance with its own guidance. The correspondence between the Applicant and Department also makes repeated references to a requirement for a new application.

In any event, the Department has not been asked to determine the October 2012 application. It has been asked to determine the December 2019 application. The 2019 application is the "Project" for the purposes of the EIA Directive and that project was initiated after the introduction of the 2014 EIA Directive and the associated updates to the Marine Works (Environmental Impact Assessment) Regulations as amended in 2017. As part of pre-application consultations between the Department and Applicant, the Department has issued a scoping opinion in respect of what matters should be included within the Environmental Statement to accompany the December 2019 Application.

It is our clients' position that the submission of a Marine Licence Application in December 2019 (which is substantially different to that submitted in 2012), the advertisement of that application, the preparation of additional environmental information and consultation on that application amounts to a fresh application and therefore the 2017 Regulations are engaged.

The Marine Environmental Conditions Update document submitted by the Applicant lists at Section 4.2 entitled "Scoping", that:

*"DAERA identified that some of the marine data used to inform the Environmental Statement in 2012 may now be considered out-dated and therefore should be supplemented with more recent information and the environmental assessments undertaken updated if necessary based on this updated baseline information before the marine licence can be finalised"*

The document goes on to list an extensive list of important environmental matters which must be updated. It is clear from the correspondence that we have seen through the Freedom of Information / Environmental Information Regulations, that the Department did not consider that all supporting documentation which it had been received and was adequate. Therefore, the application could not have been classed as formally submitted prior to 16 May 2017.

This is consistent with our previous representations that the Department should have or did in fact treat the 2012 application as withdrawn as set out in correspondence between the applicant and Department.

In any event, the environmental information submitted does not even comply with the 2011 EIA Regulations. By way of example only, it fails to include an adequate description of the project and does not include a non-technical summary taking account of the 2019 information.

### **Public Inquiry**

In light of the contentious nature of the application and the complexity of the issues, the application should be considered at a public inquiry where all relevant issues can be fully explored.

### **Consultation**

The Department must exercise its discretion to consult with the Geological Survey of Northern Ireland, Mid and East Antrim Council and the Health and Safety Executive.

### **Next Steps**

I look forward to receiving confirmation that:

1. The applicant will be asked to submit an application which complies with the application requirements set out in the Explanatory Notes including all associated plans, maps and drawings sufficient to identify the works proposed;
2. The applicant will be asked to submit a single composite Environmental Statement and a Non-Technical Summary which complies with the requirements of the 2017 EIA Regulations and assesses what has actually been applied for in the Marine Licence Application;
3. The Department will arrange for the advertisement of the fresh Marine Licence Application will publicly consult in respect of the Marine Licence Application, Environmental Statement and Habitats Regulation Assessment;
4. The Department will, as part of the consultation process, make available to the public ALL environmental information in its possession in respect of the proposed development;
5. The Department will assess and determine the application in accordance with the 2017 EIA Regulations;
6. The Department will consider and seek to resolve all representations received before reaching a decision on the Marine Licence Application;
7. The Department will consult with appropriate bodies such as the Geological Survey of Northern Ireland, the local council and the Health and Safety Executive; and
8. The Department will call a public inquiry in respect of the Marine Licence Application

Yours sincerely

A large black rectangular redaction box covers the signature area. A horizontal line extends from the right side of the box, suggesting a signature line.



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Infrastata's Planning Application for 7 Gas Caverns  
**Date:** 09 March 2020 17:20:00

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Dear Sir/Madam

I am objecting to the proposed Planning Application by Infrastata for 7 Gas Caverns in the Islandmagee area due to the following concerns:

#### PROCEDURAL ISSUES

- \* The application does not include a chart, plan or map showing exactly where the caverns will be located, as required by regulation 12(1) of the Marine Works (EIA) Regulations;
- \* The application does not include a description, including a plan of the licensable elements of the projects. Throughout the application and environmental information there are references to information being made available after a "detailed design phase";
- \* The application requests a licence for a 10 year period, yet the explanatory notes which accompany the application form state that licences will only be granted for a maximum of 3 years, the Department must clarify if the licence will be granted for 3 or 10 years;
- \* The Environmental Information which accompanies the application is spread over six separate documents. The non-technical summary relates only to an Environmental Statement produced in 2010. There is no updated, single composite environmental statement with an updated non-technical summary. This is a paper chase and is contrary to the legal requirements for EIA;
- \* The Environmental Information which accompanies the application, does not reflect or assess what is proposed in the application documents. For example the phasing of the leaching of caverns is different;
- \* For these reasons the application is invalid and does not comply with the legal requirements of an environmental impact assessment;
- \* The consultation process is also flawed as there is insufficient information to make informed and reasoned comments.

Yours sincerely

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas Storage Project December 2019 Consultation ML 28\_12, Consultation extended 13 February 2020  
**Date:** 09 March 2020 19:54:24  
**Importance:** High

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Dear Marine Licensing Team

**Re: Islandmagee Gas Storage Project December 2019 Consultation ML 28\_12, Consultation extended 13 February 2020**

I have previously submitted an objection in relation to the above-named matter, prior to the original 7<sup>th</sup> February date for closure of public consultation, and now wish to submit a further objection due to facts I was not aware of at the time of making my first objection.

I have further concerns about the application for the marine license in relation to the Islandmagee gas storage project as follows:

--[if !supportLists]-->1. <!--[endif]-->The apparent absence in the consultation documents of any map, chart or plan to indicate where precisely the caverns would be located, which I understand is required under regulation 12(1) of the Marine Works (EIA) Regulations. This is a serious concern as the noise, traffic and other impacts of the process cannot be understood without this information.

--[if !supportLists]-->2. <!--[endif]-->There appears to be no description included in the documentation of the licensable aspects of the project, although throughout the application there are references to information being available after a *detailed design phase*. When is this to be made available and why is it not set out at this juncture? Surely this information is of critical importance for any consideration of the granting of a Marine License?

--[if !supportLists]-->3. <!--[endif]-->A duration of 10 years has been requested by the applicant for the Marine License although the explanatory notes accompanying the application form state that licenses are only granted for 3 years. Clarification needs to be made by DAERA on whether the license, (should the application be successful), is to be granted for a 3 or 10 year period.

--[if !supportLists]-->4. <!--[endif]-->The Environmental information provided by the applicant is contained within 6 different documents, however the technical summary relates to an Environmental Statement produced around 10 years ago in 2010. There appears to be no updated Environmental Statement or up to date technical summary. Surely this lack of clear, precise and up to date documentation which could be readily understood and cross-referenced, goes against the legal requirements for environmental assessments?

--[if !supportLists]-->5. <!--[endif]-->There are discrepancies between the environmental information accompanying the application and what is proposed in the application documents. One example of this is the phasing of the leaching of the caverns which differs between the environmental information and the application.

In view of the above this application is not valid. It has not complied with the legislative requirements of an Environmental Impact Assessment. The consultation process would also appear to be erroneous because there is imprecise, contradictory and insufficient information to enable concerned members of the public to produce informed and fully considered reasoned contributions. Many thanks. I trust I will receive an acknowledgement of this additional objection as previously provided by DAERA.

Yours faithfully



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: Islandmagee Energy Limited - ML 28\_12  
**Date:** 10 March 2020 08:25:43

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Thank you for your email of 9th March. However, my emails of 4th February and 27th February are not responses to the consultation - they are questions which require clarification in order that I may make a further response within the timescale set by DAERA for the Public Consultation.

I trust you will appreciate, members of the public cannot give a full response to the PC when they are not in receipt of ALL pertinent facts regarding the Applicant's proposal which, to say the very least, is grossly lacking in detail and clarity.

I therefore would be obliged to receive answers to the points raised in my previous communications as a matter of urgency.

Regards,

[REDACTED]

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**From:** DAERA Marine Licensing Team <[REDACTED]>  
**Sent:** 09 March 2020 17:25  
**To:** [REDACTED] <[REDACTED]>  
**Subject:** RE: Islandmagee Energy Limited - ML 28\_12

Thank you for your response to the consultation. All submissions will be considered and responded to, in due course.  
Marine Licensing Team

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**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 09 March 2020 13:57  
**To:** DAERA Marine Licensing Team <[REDACTED]>  
**Subject:** Fw: Islandmagee Energy Limited - ML 28\_12

I refer to my email of 27th February with letter attached and email of 4th February - for ease of reference the content of which is set out below:

*I refer to my letter of objection dated 3<sup>rd</sup> February 2019 regarding the above application and would be grateful if you could clarify the following points which, whilst integral to my objection and should be treated as such, require a more urgent response in order that I may further assess the application:-  
As I have stated in my objection letter and mentioned to Joe Breen at one of the Information Sessions attended by DAERA, it is extremely difficult to ascertain what environmental information is still relevant and which documents have been partly, or*

*wholly, updated. Please therefore clarify which parts of the Environmental Statements have been superceded and/or amended. Please provide "marked-up" versions of the documents so I may fully understand what updates have been completed. Alternatively, a list or table specifying what deletions or amendments have been done would suffice. As I understand the project to be deemed "high risk" requiring the input of Health & Safety Executive NI and Geological Survey of NI, please provide copies of their consultation responses.*

*Please advise where I can locate a full set of detailed, to-scale drawings of what is proposed by the applicant, including detailed to-scale drawing showing precise location of where the caverns are proposed to be sited (ref: Page 16 of RPS' Report in 2019 Updated Application).*

*I look forward to hearing from you as soon as possible.*

I would be grateful to hear from you at your earliest convenience in order that I may make a further representation within the timescale of the Public Consultation.

Thank you in advance for your assistance.

Regards,

[REDACTED]

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**From:** [REDACTED]

**Sent:** 27 February 2020 15:49

**To:** DAERA Marine Licensing Team <[REDACTED]>

**Subject:** Islandmagee Energy Limited - ML 28\_12

Please find letter attached in respect of the above matter. I am finding it difficult to find answers within the Public Consultation documents and would be grateful to receive clarification at your earliest convenience.

Regards,

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Gas caverns  
**Date:** 11 March 2020 20:38:50

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Hi Daera

i wish to object to the gas caverns in Larne lough Co. Antrim.

i have worked for the Marine institute Ireland, shark trust of England, and have studied animal research at Trinity College Dublin. i live on the shores of Larne lough.

my objections are based on the following concerns.

if you have ever had misfortune to see a slug with salt poured on it then you would know exactly what will happen to marine life in the mud/shoreline with increase salt.

Increased salt in the shore line/MUD

The marine life in the mud/ shoreline provides food for birds and there is a number of special birds such as the sandwich turn nesting near by, and of course fish that also eat this marine life.

Increased salt in the water.

This lough because of its unique topography does not have any commercial fishing and has an unusual abundance of demersal Fish .

the plankton in these waters will be dramatically effected as will all marine life.

special fish in these waters include the Common skate a protected species Portabeagle shark protected Basking Shark protected all will be die from increased salt in the water.

increased water temperature

this will have an effect on all marine life but mostly the plankton causing dangerous algae and jelly fish blooms.

This project cannot be permitted to proceed.

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Island Magee Gas Storage Project  
**Date:** 11 March 2020 22:01:11

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Dear Sir,

I refer to the above consultation in respect of the Marine Licence Application.

I am writing on behalf of Queens University Triathlon Club. Its members, both graduates and students, who take part in triathlon events throughout Northern Ireland and various international events. Triathlon consists of swimming, cycling and running. All of our members take part in open water swimming events and regularly swim in the Browns Bay, Carrickfergus and Islandmagee areas as part of our training. We also take part in events such as the Browns Bay Beast Triathlon, White Bear Triathlon and Carrickfergus Castle Triathlon all of which are in the locality of the proposed development.

We are extremely concerned about the proposed development and its impact on water quality and biodiversity in the area. Construction of project infrastructure is proposed within a highly designated area – North Channel Special Area of Conservation (SAC), Larne Lough Special Area of Protection (SPA) and the proposed East Coast SPA and is functionally linked to Portmuck ASSI, the Gobbins ASSI and the Maidens SAC. Development in these areas can only be permitted in very limited circumstances.

The area around Islandmagee is known for its outstanding biodiversity and, as such, has been designated as a wildlife sanctuary for many of our most threatened species and habitats. This area supports many unique and rare marine assemblages within the UK. For example, the Maidens SAC site selection assessment states that the 'hydrographic conditions present round the Maidens and the proximity of deep water to the plateau result in conditions not found in many other UK areas and consequently these habitats are extremely rare'. The diversity of fragile sponge species and the presence of rare species make the sponge communities found within the Maidens SAC 'some of the most important in the British Isles'. The official information sheet for the North Channel SAC describes the site as 'one of the best areas in the United Kingdom' for harbour porpoise (JNCC, 2019). It is these very features that attract triathletes to the area to train and race. Some of these features were showcased as part of the Giro d'Italia which visited the area in 2014 and encourage huge numbers of tourists to the area who visit the Gobbins Walk and other tourist destinations in the area.

#### **Concerns of Triathletes**

We have set out below the particular concerns of our members which relate to their use of the area for triathlon training and competition. In summary, we have grave concerns in respect of the potential impact on water quality during the construction and operation of the development. We believe that the potential impacts have not been properly assessed and in the absence of such information, the application should be refused.

- The potential impact on bathing water quality is restricted to Brown's Bay, there are several other areas in the locality that are popular with open water swimmers;
- The consideration of bathing water quality uses data which is over ten years old;
- The environmental assessment does not consider the Bathing Water Directive of 2015 – the environmental assessment must be completely updated to consider these more stringent standards;
- There is no consideration at all of the potential impacts on open water swimmers using the area during the construction and operational phases;
- the EIS states that 'Explosives may be required to excavate the drilling pit / sump into the rock' (EIS, p. 4-44), yet the potential impact of explosive use on swimmers and wildlife has not been assessed.
- There is no management plan to communicate to open water swimmers when explosives will be used or other construction techniques that might pose a danger to swimmers in the area;
- There is no proposals for monitoring brine and sediment levels in areas popular with open water swimmers;
- There is no identification of "no go areas" for swimmers during the construction phase and in

particular when explosives are being utilised;

- It is proposed to pump super-saline into a highly designated area. The impacts of this on swimmers and other recreational users of the water has not been assessed.
- In relation to the brine dispersal, Appendix B Brine Modelling Dispersion, repeatedly states that the temperature of the brine will be around 20C above the temperature of the intake water, however the temperature of the intake water is not stated in this document. Water temperature is a key component of water quality. Water temperature and any localised changes to water temperature can have an impact on water quality and in particular growth of certain organisms that can illness in swimmers. This has not been assessed or considered and we have not been provided with sufficient information to interrogate the point further.
- The dispersion model has not accounted for storm surges, in which dilution may be greater but dispersion would also increase. There has been no consideration of the potential increase in the area of brine dispersion on bathing waters and on the environment in general.
- The assessment of economic impacts does not assess the importance of cycling to the tourist economy and uses data from 2008 to indicate tourism reasons for visit. This data pre-dates the successful Giro d'Italia which went through the area and has encouraged cycling tourism.

### **Other Environmental Concerns**

- The project justification presented in the submitted documentation is outdated and doesn't take account of the requirements of the Paris Agreement;
- Construction of project infrastructure is proposed within a highly designated area – North Channel Special Area of Conservation (SAC), Larne Lough Special Area of Protection (SPA) and the proposed East Coast SPA and is functionally linked to Portmuck ASSI, the Gobbins ASSI and the Maidens SAC;
- Super saline brine will be discharged within the North Channel SAC and the proposed East Coast (NI) SPA;
- Construction of the seawater intake and brine outfall pipe has the potential to cause a temporary threshold shift (TTS) and permanent threshold shift (PTS) to harbour porpoise, TTS to grey seals and TTS to fish whereby hearing involves a swim bladder or other gas volumes (this may cause behavioural effects at individual or population level);
- There is no assessment of the cumulative impacts of existing noise sources and noise associated with the proposed development;
- The link between vital ecosystem components such as fish and foraging birds has been omitted;
- The impact of underwater noise and vibration from the formation of the caverns under Larne Lough has not been assessed;
- The brine dispersion model has not accounted for storm surges;
- The mitigation proposed for disturbance to marine mammals (use of Marine Mammal Observers (MMO)) is not adequate;
- The shadow Habitats Regulation Assessment notes that other species will be effected negatively, yet no mitigation measures are proposed;
- There is a significant discrepancy between the size of the construction footprint for the brine outfall pipe within the Construction Method Statement and shadow Habitats Regulation Assessment.
- Significant policy frameworks, such as the Northern Ireland Marine Plan, Environment Strategy for Northern Ireland and Energy Strategy remain to be implemented and/or are currently under public consultation.

### **Procedural Issues**

We wish to raise the following procedural issues in respect of the application:

- the application does not include a chart, plan or map showing exactly where the caverns will be



- located, as required by regulation 12(1) of the Marine Works (EIA) Regulations;
- the application does not include a description, including a plan of the licensable elements of the projects. Throughout the application and environmental information there are references to information being made available after a “detailed design phase”;
- the application requests a licence for a 10 year period, yet the explanatory notes which accompany the application form state that licences will only be granted for a maximum of 3 years, the Department must clarify if the licence will be granted for 3 or 10 years;
- the Environmental Information which accompanies the application is spread over six separate documents. The non-technical summary relates only to an Environmental Statement produced in 2010. There is no updated, single composite environmental statement with an updated non-technical summary. This is a paper chase and is contrary to the legal requirements for EIA;
- the Environmental Information which accompanies the application, does not reflect or assess what is proposed in the application documents. For example the phasing of the leaching of caverns is different; the capacity of the caverns is different; the application does not refer to dredging as a licensed activity yet the environmental information refers to dredging;
- for these reasons the application is invalid and does not comply with the legal requirements of an environmental impact assessment;
- the consultation process is also flawed as there is insufficient information to make informed and reasoned comments.

### **Inconsistencies in the application documentation**

We have reviewed the voluminous documentation which makes up this application. It is almost impossible to ascertain what exactly is proposed and what exactly has been assessed for the purposes of Environmental Impact Assessment. We wish to raise the following matters:

- Throughout the application document there are reference to further detailed design work which will determine precise locations and precise design details of various elements of the project. We understand that the applicant has carried out the “FEED” assessment and therefore should be in a position to present this detailed design but has chosen not to.
- The Marine Licence legislation does not allow for an “outline consent” process where detailed design can be approved later by subsequent consents. The applicant must therefore include a detailed Construction Method Statement with its application so that the Department and members of the public can clearly understand what is proposed, how it will be constructed and the Department can then carry out an Environmental Impact Assessment of those works and their construction.
- The application document dated December 2019 is inconsistent with the Environmental Information submitted in support of the application.
- The design for both the brine outfall pipeline and the intake pipe as described in the Construction Method Statement (CMS) does not match that which is assessed in the Marine Environmental Conditions Update and subsequently considered within the shadow HRA. In respect of the brine outfall pipeline, the CMS states that “The HDD is expected to break the seabed surface at a distance of some 300-350m offshore with the remaining 100-150m of outfall laid on the seabed with rock mound protection”. The Marine Environmental Conditions Update and the original ES, it is consistently stated that the HDD will break out at, or close to, the outfall point. The shadow HRA states that the pipe section will only be approximately 40m in length. The environmental impacts of the application have not therefore been assessed.
- For the intake pipe, three different construction methods are proposed within the CMS. Two of these methods are similar to what is assessed within the other documents but the third option represents a very different approach. It involves “a section of pipe running above ground and pinned to the rocks with a pipe length on the seabed secured with concrete saddles”, and has not been assessed for potential impacts in the documentation. This method would significantly increase the direct take footprint of the seabed and the differing construction methods have the potential to result in significantly different impacts to the marine environment than the others presented.
- There are many more examples of inconsistencies between the application and environmental information. It is clear that the environmental information presented does not in fact assess the application proposal.
- For these reasons, the Department should require that the applicant submit a fresh application which includes all detailed proposals and to submit an application which meets the requirement of the EIA Regulations 2017.

For these reasons the application in its present form cannot be granted consent.

Yours faithfully,

QUEEN'S TRIATHLON CLUB  
[www.queenstriathlon.com](http://www.queenstriathlon.com)



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: Updated Islandmagee Objection Acknowledgement Letter - February 2020 - ML 28\_12 Consultation has been extended  
**Date:** 12 March 2020 13:51:56

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Thanks for that.

[REDACTED]

On Thu, 12 Mar 2020, 13:38 DAERA Marine Licensing Team,  
<[REDACTED]> wrote:

Good afternoon,

I would be grateful if you could please provide me with your address to allow me to post a copy of the Environmental Impact Statement to you. We will not charge a fee for providing you with a copy of this document on this occasion.

Kind Regards,

Marine Licensing Team

**From:** [REDACTED]  
**Sent:** 08 March 2020 16:17  
**To:** [REDACTED]  
**Subject:** Re: Updated Islandmagee Objection Acknowledgement Letter - February 2020 - ML 28\_12 Consultation has been extended

[REDACTED]

I am unable to open the attachment at <https://www.daera-ni.gov.uk/sites/default/files/consultations/daera/eis-chapters.pdf>

Can you please send me a copy of this document?

Many thanks in anticipation.

Yours Sincerely

[REDACTED]

On Tue, 18 Feb 2020, 11:52 [REDACTED] <[REDACTED]> wrote:

**Environment,  
Marine &  
Fisheries Group**

Marine & Fisheries  
Division



Your reference:

Our reference: ML  
28\_12

1<sup>st</sup> Floor, Klondyke Building

Cromac Avenue

Belfast BT7 2JA

Telephone: 02890 569247

Email: [marinelicensingteam@daera-ni.gov.uk](mailto:marinelicensingteam@daera-ni.gov.uk)

Date: 18 February 2020

Dear [REDACTED]

**ISLANDMAGEE GAS STORAGE MARINE LICENCE APPLICATION**

Thank you for your response on the recent Islandmagee Gas Storage public consultation.

A previous consultation opened on 20 December 2019 and closed on 7 February 2020. As a result of an administrative oversight in the original newspaper advertisement, the Department, with the support of the applicant, has decided to run another consultation for a further 42 days.

Your response has been logged and will be included in the consultation process.

You do not need to make a further response if you have already replied during the

20 December 2019- 7 February 2020 consultation period.

<https://www.daera-ni.gov.uk/consultations/islandmagee-gas-storage-project-december-2019-consultation-ml-2812>

**Kind Regards**

Marine Licensing Team

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Cc:** [REDACTED]  
**Subject:** Islandmagee Energy Marine Licence Consultation ML 28\_12  
**Date:** 15 March 2020 09:41:52

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Dear Sir/ Madam

Further to my previous email copied below I wish to make further objection as follows:-

Fishing is an important part of our local economy and is a legitimate use of the sea; The Environmental Information presented confirms that there will be adverse impacts on a broad range of species; Table 7-2126 of the Environmental Update Report shows “minor (adverse)” impacts from brine discharge on a broad range of species including fish, plankton, shellfish and benthic subtidal habitat with no mitigation proposed for any of these. While these impacts are considered to be minor, the fact remains that this application will have adverse impacts on a huge range of species within two designated sites. The applicant has not included Portmuck ASSI or The Gobbins ASSI into their assessment on impacts to designated sites. Both of these sites list breeding seabirds within their qualifying features and include razorbill, guillemot and kittiwake among others. Both sites are functionally linked to the proposed discharge area. The omission of any assessment of the potential impacts on the Gobbins ASSI is particularly striking given the importance of the Gobbins cliff top path. A key feature of the cliff top path is the opportunity to see rare seabirds and other sea life. Tourism is an important and legitimate use of our sea and makes an important contribution to our local economy. Construction of the seawater intake and brine outfall pipe has the potential to cause a temporary threshold shift (TTS) and permanent threshold shift (PTS) to harbour porpoise, TTS to grey seals and TTS to fish whereby hearing involves a swim bladder or other gas volumes (this may cause behavioural effects at individual or population level); The bird survey data presented is woefully inadequate. It is either extremely out of date or fails to the updated (2019) bird surveys provided by the applicant and believes that they are of extremely limited value in determining whether there are important bird foraging areas in the vicinity of the brine outfall. These surveys were not carried out at the appropriate time of year to obtain an accurate record of the usage of the site by foraging seabirds. Additionally, previous surveys carried out for the site are now notably out of date and cannot be considered as a basis for determining whether the proposed discharge site is of importance to foraging seabirds; The link between vital ecosystem components such as fish and foraging birds has been omitted; The impact of underwater noise and vibration from the formation of the caverns under Larne Lough has not been assessed; and The brine dispersion model has not accounted for storm surges. For the above reasons the application documents do not meet the requirements of the EIA Directive or the Habitats Directive. The application should either be refused or the applicant should be asked to submit further environmental information and a fresh application.

Thank you for your attention

Yours faithfully

[REDACTED]

Dear Sir / Madam,

Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the

associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

- 1) the project is totally contrary to UK energy policy regarding the use of fossil fuel technology. we need to be reduce existing fossil fuel power generation not facilitate their longevity.
- 2) There are myriad ecological reasons why this area with all the applicable designations SPA, SAC, SSSI needs to be protected. The project owners have neither the knowledge nor the resources to ensure a sufficient degree of protection either in construction or operation.
- 3) My family have lived in the area for well over 120 years and have seen the decline in the rural economy during that time since the advent of Ballylumford A. The only solution is a buoyant tourist economy based on the natural beauty and peaceful environment. This project benefits no one but the shareholders of the company who have no concern for either the local community nor the local environment.

I very much hope you will respect this objection.

Yours faithfully

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas Storage Project December 2019 Consultation ML 28\_12, Consultation extended 13 February 2020 - further letter of objection  
**Date:** 15 March 2020 17:19:04  
**Importance:** High

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Dear Marine Licensing Team

Please note this is the 3rd objection I have submitted as I remain very concerned, especially because I have become aware of more issues in relation to this high risk project. I would have liked to have raised the following points with you in person at the next public consultation event, however I am unable to attend as it is during working hours and I am also concerned in relation to Covid-19 contagion. I therefore would like to draw attention to the following matters:

- The Islandmagee community has a long-standing reliance on fishing as a crucial aspect of its economy yet the environmental information in the company reports indicates that a large range of species will be negatively impacted upon by this project. For example, table 7-2126 of the Environmental Update Report indicates “minor (adverse)” impacts from brine discharge on a wide range of species including shellfish, fish, plankton, and benthic sub-tidal habitat without any proposed mitigation for these species. It is concerning that although it is understood these effects will be considered minimal, this project would adversely impact on a massive range of species within two designated sites.
- The applicant has neglected to include the Portmuck Area of Special Scientific Interest (ASSI) or The Gobbins ASSI within the assessment they have made regarding impacts to designated sites. This is a major omission as both of these sites contain breeding seabirds that are within their qualifying features; including kittiwake, guillemot and razorbill, along with others. Each of these sites is functionally linked to the proposed discharge area. The failure to include any assessment of the potential impacts on the Gobbins ASSI is particularly worrying in view of the significance of the Gobbins cliff top path which provides rare opportunity to experience sightings of scarce seabirds and other sea life. The Gobbins Cliff Path has provided the area with a tourist destination which brings additional economy into Islandmagee and local employment. Tourism is an important and legitimate use of the sea and its contribution to the local economy cannot be underestimated. Unfortunately this project would most likely greatly undermine that.
- The construction works to create the seawater intake and brine outfall pipe could potentially cause a temporary threshold shift (TTS) and a permanent threshold shift (PTS) to the harbour porpoise, and a TTS to grey seals and a TTS to fish due to the vibration and noise impacts which may cause behavioural effects at individual or population level.
- The data presented in the bird survey is extremely inadequate. It appears to be



exceedingly out of date and the updated (2019) bird surveys provided by the applicant are of extremely limited value in determining whether the brine outfall areas will be in the vicinity of important bird foraging areas. There has been a failure to conduct these surveys at the correct time of year to ascertain an accurate record of the usage of the site by foraging seabirds.

- Also previous surveys conducted for the site are significantly out of date and thus cannot be considered a basis for determining whether the proposed discharge site is in an area of importance to foraging seabirds.
- Furthermore the connection between vital ecosystem components such as fish and foraging birds is absent from the reports provided by the company.
- Any assessment of the effect of underwater vibration and noise from the construction of the caverns under Larne Lough (if indeed that is where they are to be) has not been assessed.
- It also appears that the brine dispersion model has not accounted for storm surges.

In view of all the above reasons the documents submitted for this application for a Marine License do not comply with the requirements of the Environmental Impact Assessment Directive or the Habitats Directive. As a result this application should either be refused or the applicant should be requested to submit further environmental information and a new application.

Yours faithfully

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

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: Islandmagee Energy Limited - ML 28\_12  
**Date:** 16 March 2020 15:11:54

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Thank you for your email of 11<sup>th</sup> March.

I note what you say regarding documents relevant to the current application being available on the DAERA website, however you also acknowledge that a detailed plan showing the precise location of the caverns is not attached to the application. I would again reiterate that, in order for members of the public to be able to fully respond to the Public Consultation, they should be aware of exactly where the caverns are to be located. Please advise at what stage of the application process will such a detailed layout plan be available.

My query regarding the consultation responses from HSENI and GSNI has not been addressed. If you are unable to provide copies of their responses, I would be grateful if you could advise where I may locate them.

I look forward to hearing from you at your earliest convenience in order that my further submission in relation to the Public Consultation may be with you prior to 27<sup>th</sup> March.

Regards,

[REDACTED]

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**From:** DAERA Marine Licensing Team <[REDACTED]>  
**Sent:** 11 March 2020 14:19  
**To:** [REDACTED] <[REDACTED]>  
**Subject:** RE: Islandmagee Energy Limited - ML 28\_12

Dear [REDACTED],

Thank you for your correspondence referring to the public consultation on the marine licence for the Islandmagee gas cavern proposal ML 28\_12 and letter dated 27<sup>th</sup> of February containing questions which are addressed below.

A marine licence can be issued for any length of time and will usually cover the construction period of a project proposal, which in this case would be more than 3 years and could be for the full lifespan of the project. Subsequent designations or changes to issues relevant to marine licensing considerations (such as environmental, navigational etc.) would be reviewed throughout the lifetime of any licence. Any licence can be drafted with appropriate time scales and review periods to ensure that the licenced activity is appropriately controlled. Environmental assessments would be required throughout the lifetime of a project such as this, in particular monitoring of any potential impacts would be a key consideration.

In answer to your questions in paragraph 3; all documents relevant to the current application are available on the DAERA website at <https://www.daera-ni.gov.uk/consultations/islandmagee-gas-storage-project-december-2019-consultation-ml-2812>. References from the 2012 documents to the company website are no longer up to date and do not control what is available on external websites such as the company website. The Environmental Monitoring Programme has not been

agreed at this stage and therefore is not available. This will be designed and peer-reviewed by a science group of experts at a later date and it would be made publically available.

In answer to your question in paragraph 4; the non-technical summary and original EIA was completed for the planning permission and Marine Licence Application in 2012, and it underpins the planning permission which has been granted. This was available to the public for the planning consultation and previous marine licence consultation in 2012. The more recent updates for environmental surveys have not required a change to the non-technical summary.

Question 1: The wellheads are components of the terrestrial well pad.

Question 2: Your concern is noted over accurate location of the proposed cavern construction.

Question 3: The figure of 1700m in the 2019 application is under consideration by DAERA. Any changes would have to be approved by DAERA.

Questions 4: All caverns are to be located under the seabed.

To answer your last question there is no current timescale available for DAERA to produce a HRA.

Regards,  
Marine Licensing Team

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**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 10 March 2020 08:25  
**To:** DAERA Marine Licensing Team <[REDACTED]>  
**Subject:** Re: Islandmagee Energy Limited - ML 28\_12

Thank you for your email of 9th March. However, my emails of 4th February and 27th February are not responses to the consultation - they are questions which require clarification in order that I may make a further response within the timescale set by DAERA for the Public Consultation.

I trust you will appreciate, members of the public cannot give a full response to the PC when they are not in receipt of ALL pertinent facts regarding the Applicant's proposal which, to say the very least, is grossly lacking in detail and clarity.

I therefore would be obliged to receive answers to the points raised in my previous communications as a matter of urgency.

Regards,

[REDACTED]

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**From:** DAERA Marine Licensing Team <[REDACTED]>  
**Sent:** 09 March 2020 17:25  
**To:** [REDACTED] <[REDACTED]>

**Subject:** RE: Islandmagee Energy Limited - ML 28\_12

Thank you for your response to the consultation. All submissions will be considered and responded to, in due course.

Marine Licensing Team

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**From:** [REDACTED] [mailto:[REDACTED]]

**Sent:** 09 March 2020 13:57

**To:** DAERA Marine Licensing Team <[REDACTED]>

**Subject:** Fw: Islandmagee Energy Limited - ML 28\_12

I refer to my email of 27th February with letter attached and email of 4th February - for ease of reference the content of which is set out below:

*I refer to my letter of objection dated 3<sup>rd</sup> February 2019 regarding the above application and would be grateful if you could clarify the following points which, whilst integral to my objection and should be treated as such, require a more urgent response in order that I may further assess the application:-*

*As I have stated in my objection letter and mentioned to Joe Breen at one of the Information Sessions attended by DAERA, it is extremely difficult to ascertain what environmental information is still relevant and which documents have been partly, or wholly, updated. Please therefore clarify which parts of the Environmental Statements have been superceded and/or amended. Please provide "marked-up" versions of the documents so I may fully understand what updates have been completed. Alternatively, a list or table specifying what deletions or amendments have been done would suffice. As I understand the project to be deemed "high risk" requiring the input of Health & Safety Executive NI and Geological Survey of NI, please provide copies of their consultation responses.*

*Please advise where I can locate a full set of detailed, to-scale drawings of what is proposed by the applicant, including detailed to-scale drawing showing precise location of where the caverns are proposed to be sited (ref: Page 16 of RPS' Report in 2019 Updated Application).*

*I look forward to hearing from you as soon as possible.*

I would be grateful to hear from you at your earliest convenience in order that I may make a further representation within the timescale of the Public Consultation.

Thank you in advance for your assistance.

Regards,

[REDACTED]

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**From:** [REDACTED]

**Sent:** 27 February 2020 15:49

**To:** DAERA Marine Licensing Team <[REDACTED]>

**Subject:** Islandmagee Energy Limited - ML 28\_12

Please find letter attached in respect of the above matter. I am finding it difficult to find answers within the Public Consultation documents and would be grateful to receive clarification at your earliest convenience.

Regards,

A solid black rectangular redaction box covering the signature area.

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas storage ML28\_12  
**Date:** 18 March 2020 11:54:09  
**Attachments:** [image001.png](#)

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Good morning

Considering the current climate, I trust you are all safe and well.

In addition to my previous communications and objections, please see below some further points I am raising.

- Cavern location are unclear and / or not specified. A requirement of 12(1) of the Marine Works (EIA) Regulations. There are indications that the caverns will / maybe be constructed under land?
- Project description is unclear of vague.
- No detail, including plans of the licensable elements of the projects. Throughout the application and environmental information there are references to information being made available after a “detailed design phase”, why has that not been complete as there will surely be “Unknowns” until that element is done, we cannot and it impossible to have a balanced view with no plans, currently it is all assumptions.
- Duration of licence validity. This is unclear and the application requests a licence for a 10 year period, yet the explanatory notes which accompany the application form state that licences will only be granted for a maximum of 3 years? Can we get clarity on that please along with the detail as to why we are seeing a huge variance.
- 
- Up to date non-technical summary. The Environmental Information which accompanies the application is spread over six separate documents. The non-technical summary relates only to an Environmental Statement produced in 2010. There is no updated, single composite environmental statement with an updated non-technical summary. This is a paper chase and is contrary to the legal requirements for EIA.
- Conflicting information in the environmental data ( Eg – Cavern Leaching schedule) The Environmental Information which accompanies the application, does not reflect or assess what is proposed in the application documents. One example being the phasing of the leaching of caverns is very different.
- Insufficient and conflicting information along with the consultation process being flawed as there is insufficient or lack of information to make informed and reasoned comments.
- The Marine Licence legislation does not allow for an “outline consent” process where detailed design can be approved later by subsequent consents. The applicant must therefore include a detailed Construction Method Statement with its application so that the Department and members of the public can clearly understand what is proposed, how it will be constructed and the Department can then carry out an Environmental Impact Assessment of those works and their construction.

The application document dated Dec 2019 is conflicting and inconsistent with environmental information submitted in support of the application. The design for both the brine outfall pipeline and the intake pipe as described in the Construction Method Statement (CMS) does not match that which is assessed in the Marine Environmental Conditions Update and subsequently considered within the shadow HRA. In respect of the brine outfall pipeline, the CMS states that “The HDD is expected to break the seabed surface at a distance of some 300-350m offshore with the remaining 100-150m of outfall laid on the seabed with rock mound protection”. The Marine Environmental Conditions Update and the original ES, it is consistently stated that the HDD will break out at, or close to, the outfall point. The shadow HRA states that the pipe section will only be approximately 40m in length. The environmental impacts of the application have not therefore been assessed.

- For the intake pipe, three different construction methods are proposed within the CMS. Two of these methods are similar to what is assessed within the other documents but the third option represents a very different approach. It involves “a section of pipe running above ground and pinned to the rocks with a pipe length on the seabed secured with concrete saddles”, and has not been assessed for potential impacts in the documentation. This method would significantly increase the direct take footprint of the seabed and the differing construction methods have the potential to result in significantly different impacts to the marine environment than the others presented.

There are many more examples of inconsistencies between the application and environmental information. It is clear that the environmental information presented does not in fact assess the application proposal.

For these reasons, the Department should require that the Applicant submit further environmental information.

- Fishing is an important part of our local economy and is a legitimate use of the sea.
- The Environmental Information presented confirms that there will be adverse impacts on a broad range of species.
- Table 7-2126 of the Environmental Update Report shows “minor (adverse)” impacts from brine discharge on a broad range of species including fish, plankton, shellfish and benthic subtidal habitat with no mitigation proposed for any of these. While these impacts are considered to be minor, the fact remains that this application will have adverse impacts on a huge range of species within two designated sites.
- The applicant has not included Portmuck ASSI or The Gobbins ASSI into their assessment on impacts to designated sites. Both of these sites list breeding seabirds within their qualifying features and include razorbill, guillemot and kittiwake among others. Both sites are functionally linked to the proposed discharge area. The omission of any assessment of the potential impacts on the Gobbins ASSI is particularly striking given the importance of the Gobbins cliff top path. A key feature of the cliff top path is the opportunity to see rare seabirds and other sea life. Tourism is an important and legitimate use of our sea and makes an important and growing contribution to our local economy. There are also plans to ensure that connectivity is key in these areas to ensure we are aligned to digital growth, there is significant investment plans to deliver this along with plans to expand the Gobbins

path, which will both increase tourism along with increases in revenue streams and opportunity into the Island and surrounding seas.

- Construction of the seawater intake and brine outfall pipe has the potential to cause a temporary threshold shift (TTS) and permanent threshold shift (PTS) to harbour porpoise, TTS to grey seals and TTS to fish whereby hearing involves a swim bladder or other gas volumes (this may cause behavioural effects at individual or population level).
- The bird survey data presented is woefully inadequate. It is either extremely out of date or fails to the updated (2019) bird surveys provided by the applicant and believes that they are of extremely limited value in determining whether there are important bird foraging areas in the vicinity of the brine outfall. These surveys were not carried out at the appropriate time of year to obtain an accurate record of the usage of the site by foraging seabirds.
- Additionally, previous surveys carried out for the site are now notably out of date and cannot be considered as a basis for determining whether the proposed discharge site is of importance to foraging seabirds.
- The link between vital ecosystem components such as fish and foraging birds has been omitted.
- The impact of underwater noise and vibration from the formation of the caverns under Larne Lough has not been assessed along with the very clear fact that this is “New” noise. There will be acoustics created that are alien to this region and seas and cannot assume just because “Boats and ferries” make noise that “Noise is Noise” and “Creatures will adapt or move away” We should not just focus on construction noise either, there is nothing to demonstrate what “New noise” will be created whilst this plant / structure outfall pipe etc is in operation over its lifespan and will that change over time due to environment changes or equipment changing /aging or being replaced?
- The brine dispersion model has not accounted for storm surges and they are VERY common around these islands and are increasing.

In addition to my already detailed and robust challenges that I have previously communicated and the above reasons given today, the application documents do not meet the requirements of the EIA Directive or the Habitats Directive. The application should either be refused or the applicant should be asked to submit further environmental information and a fresh application.

Thank you again for your time on this matter.

kindest Regards







**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: Islandmagee Energy Limited - ML 28\_12  
**Date:** 18 March 2020 12:09:48

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Thank you for your response of 16th March.

Attachment #6 of the Application Form shows the area where the intake and outflow pipes are proposed to be located. Attachment #1 of the Application Form shows approximate location of the caverns as Point "A". Can you confirm this is the plan to which you refer? Can you also confirm that the detailed design work is currently being undertaken and, if so, are you able to provide an estimated completion date?

Regards,

[REDACTED]

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**From:** DAERA Marine Licensing Team <[REDACTED]>  
**Sent:** 16 March 2020 17:02  
**To:** [REDACTED] <[REDACTED]>  
**Subject:** RE: Islandmagee Energy Limited - ML 28\_12

Thank you for your email.

Correspondence and consultation with HSENI and GSNI is ongoing and they will be able to provide information to you if you require it.

The detailed design stage and precise location of the caverns within the area on the application is not yet complete. However any proposal will be within the envelope of the areas displayed in the application form, attachment 6B.

Best wishes,  
Marine Licensing Team

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**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 16 March 2020 15:12  
**To:** DAERA Marine Licensing Team <[REDACTED]>  
**Subject:** Re: Islandmagee Energy Limited - ML 28\_12

Thank you for your email of 11<sup>th</sup> March.

I note what you say regarding documents relevant to the current application being available on the DAERA website, however you also acknowledge that a detailed plan showing the precise location of the caverns is not attached to the application. I would again reiterate that, in order for members of the public to be able to fully respond to the Public Consultation, they should be aware of exactly where the caverns are to be located. Please advise at what stage of the application process will such a detailed layout plan be available.

My query regarding the consultation responses from HSENI and GSNI has not been addressed. If

you are unable to provide copies of their responses, I would be grateful if you could advise where I may locate them.

I look forward to hearing from you at your earliest convenience in order that my further submission in relation to the Public Consultation may be with you prior to 27<sup>th</sup> March.

Regards,

[REDACTED]

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**From:** DAERA Marine Licensing Team <[REDACTED]>  
**Sent:** 11 March 2020 14:19  
**To:** [REDACTED] <[REDACTED]>  
**Subject:** RE: Islandmagee Energy Limited - ML 28\_12

Dear [REDACTED],

Thank you for your correspondence referring to the public consultation on the marine licence for the Islandmagee gas cavern proposal ML 28\_12 and letter dated 27<sup>th</sup> of February containing questions which are addressed below.

A marine licence can be issued for any length of time and will usually cover the construction period of a project proposal, which in this case would be more than 3 years and could be for the full lifespan of the project. Subsequent designations or changes to issues relevant to marine licensing considerations (such as environmental, navigational etc.) would be reviewed throughout the lifetime of any licence. Any licence can be drafted with appropriate time scales and review periods to ensure that the licenced activity is appropriately controlled. Environmental assessments would be required throughout the lifetime of a project such as this, in particular monitoring of any potential impacts would be a key consideration.

In answer to your questions in paragraph 3; all documents relevant to the current application are available on the DAERA website at <https://www.daera-ni.gov.uk/consultations/islandmagee-gas-storage-project-december-2019-consultation-ml-2812>. References from the 2012 documents to the company website are no longer up to date and do not control what is available on external websites such as the company website. The Environmental Monitoring Programme has not been agreed at this stage and therefore is not available. This will be designed and peer-reviewed by a science group of experts at a later date and it would be made publically available.

In answer to your question in paragraph 4; the non-technical summary and original EIA was completed for the planning permission and Marine Licence Application in 2012, and it underpins the planning permission which has been granted. This was available to the public for the planning consultation and previous marine licence consultation in 2012. The more recent updates for environmental surveys have not required a change to the non-technical summary.

Question 1: The wellheads are components of the terrestrial well pad.

Question 2: Your concern is noted over accurate location of the proposed cavern construction.

Question 3: The figure of 1700m in the 2019 application is under consideration by DAERA. Any changes would have to be approved by DAERA.

Questions 4: All caverns are to be located under the seabed.

To answer your last question there is no current timescale available for DAERA to produce a HRA.

Regards,  
Marine Licensing Team

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**From:** [REDACTED] [[mailto:\[REDACTED\]](mailto:[REDACTED])]

**Sent:** 10 March 2020 08:25

**To:** DAERA Marine Licensing Team <[REDACTED]>

**Subject:** Re: Islandmagee Energy Limited - ML 28\_12

Thank you for your email of 9th March. However, my emails of 4th February and 27th February are not responses to the consultation - they are questions which require clarification in order that I may make a further response within the timescale set by DAERA for the Public Consultation.

I trust you will appreciate, members of the public cannot give a full response to the PC when they are not in receipt of ALL pertinent facts regarding the Applicant's proposal which, to say the very least, is grossly lacking in detail and clarity.

I therefore would be obliged to receive answers to the points raised in my previous communications as a matter of urgency.

Regards,

[REDACTED]

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**From:** DAERA Marine Licensing Team <[REDACTED]>

**Sent:** 09 March 2020 17:25

**To:** [REDACTED] <[REDACTED]>

**Subject:** RE: Islandmagee Energy Limited - ML 28\_12

Thank you for your response to the consultation. All submissions will be considered and responded to, in due course.

Marine Licensing Team

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**From:** [REDACTED] [[mailto:\[REDACTED\]](mailto:[REDACTED])]

**Sent:** 09 March 2020 13:57

**To:** DAERA Marine Licensing Team <[REDACTED]>

**Subject:** Fw: Islandmagee Energy Limited - ML 28\_12

I refer to my email of 27th February with letter attached and email of 4th February - for ease of reference the content of which is set out below:

*I refer to my letter of objection dated 3<sup>rd</sup> February 2019 regarding the above application and would be grateful if you could clarify the following points which, whilst integral to my objection and should be treated as such, require a more urgent response in order that I may further assess the application:-*

*As I have stated in my objection letter and mentioned to Joe Breen at one of the Information Sessions attended by DAERA, it is extremely difficult to ascertain what environmental information is still relevant and which documents have been partly, or wholly, updated. Please therefore clarify which parts of the Environmental Statements have been superseded and/or amended. Please provide "marked-up" versions of the documents so I may fully understand what updates have been completed. Alternatively, a list or table specifying what deletions or amendments have been done would suffice. As I understand the project to be deemed "high risk" requiring the input of Health & Safety Executive NI and Geological Survey of NI, please provide copies of their consultation responses.*

*Please advise where I can locate a full set of detailed, to-scale drawings of what is proposed by the applicant, including detailed to-scale drawing showing precise location of where the caverns are proposed to be sited (ref: Page 16 of RPS' Report in 2019 Updated Application).*

*I look forward to hearing from you as soon as possible.*

I would be grateful to hear from you at your earliest convenience in order that I may make a further representation within the timescale of the Public Consultation.

Thank you in advance for your assistance.

Regards,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 27 February 2020 15:49  
**To:** DAERA Marine Licensing Team <[REDACTED]>  
**Subject:** Islandmagee Energy Limited - ML 28\_12

Please find letter attached in respect of the above matter. I am finding it difficult to find answers within the Public Consultation documents and would be grateful to receive clarification at your earliest convenience.

Regards,

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Application by Islandmagee Energy  
**Date:** 19 March 2020 10:19:03

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[REDACTED]  
[REDACTED]  
[REDACTED]  
18th March,2020

Dear Sirs,

Re: Application by Islandmagee Energy

I wish to raise the following issues regarding inconsistency with the application.

1. The non- technical summary relates to an Environment Statement produced in 2010 by Infrastrata and does not appear to be updated. Is that not contrary to the legal requirements for EIA
2. There appears to be a discrepancy regarding how long the licence is granted for. is it 3 years or 10 years.
3. The design for both the brine outfall pipeline and the intake pipe as described in the Construction Method Statement (CMS) does not match that which is assessed in the Marine Environmental Conditions Update and subsequently considered within the shadow HRA. Why not?
4. The documents don't show where the caverns located. The document doesn't show this.
5. There are many more examples of inconsistencies between the application and environmental information. Which raises serious concerns.
6. Construction of the seawater intake and brine outfall pipe has the potential to cause a problems for harbour porpoise, grey seals and fish.
7. The applicant has not included Portmuck ASSI or The Gobbins ASSI into their assessment on impacts to designated sites. Both of these sites list breeding seabirds such as razorbill, guillemot and kittiwake among others. Both sites are functionally linked to the proposed discharge area. The omission of any assessment of the potential impacts on the Gobbins ASSI is particularly striking given the importance of the Gobbins cliff top path with regards to birds and tourism. Previous surveys carried out for the site are now out of date and cannot be considered as a basis for determining whether the proposed discharge site is of importance to foraging seabirds.
8. The bird survey data presented were not carried out at the appropriate time of year to obtain an accurate record of the usage of the site by foraging seabirds. Additionally, previous surveys carried out for the site are now out of date and cannot be considered as a basis for determining whether the proposed discharge site is of importance to foraging seabirds;

It would appear that the application documents do not meet the requirements of the EIA Directive or the Habitats Directive. Therefore the application should be refused.

Yours faithfully

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

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee energy  
**Date:** 22 March 2020 11:09:24

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[REDACTED]  
[REDACTED]  
[REDACTED]

18th March,2020

Dear Sirs,

Re: Application by Islandmagee Energy

I wish to raise the following issues regarding inconsistency with the application

1. The application requests a licence for a 10 year period - yet the explanatory notes which accompany the application form state that licences will only be granted for a maximum of 3 years. **Which is correct??**
2. The application does not include a description of the project. Surely this should be available at this stage.
3. The application says that further detailed design work which will determine precise locations and precise design details of various elements of the project is available but where is it.???
4. The Marine Licence legislation does not allow for an "outline consent" process where detailed design can be approved later by subsequent consents. The applicant must therefore include a detailed Construction Method Statement with its application so that the Department and members of the public can clearly understand what is proposed, how it will be constructed and the Department can then carry out an Environmental Impact Assessment of those works and their construction.
5. Where are the caverns situated??
6. The impact of underwater noise and vibration from the formation of the caverns under Larne Lough has not been assessed;
7. The brine dispersion model has not accounted for storm surges.
8. Danger to a broad range of species including fish, plankton, shellfish and benthic subtidal habitat with no mitigation proposed for any of these. While these impacts are considered to be minor, the fact remains that this application will have adverse impacts on a huge range of species within two designated sites.
9. Affect on tourism if areas like Portmuck ASSI and The gobbins ASSI which are rich in birdlife are affected.

It is for for the above reasons the application documents do not meet the requirements of the EIA Directive or the Habitats Directive. The application should either be refused or the applicant should be asked to submit further environmental information and a fresh application.

Yours faithfully,





**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: Islandmagee Energy Marine Licence Consultation ML 28\_12  
**Date:** 23 March 2020 11:03:54

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Dear Marine Licensing Team

Further to my email below and in regards to extension of the Islandmagee Energy Marine Licence Consultation ML 28\_12, I have some further queries I would like to bring to your attention and further clarification regarding the applicants application and submitted documents.

**1. Where are the caverns to be located?** I was informed by Islandmagee Energy at a previous Open Day that the caverns would be under the sea bed. On the submitted application, I can see no reference to caverns location. There is no map, chart or plan as required by The Marine Works Regulations (12.1). There is also no actual description of the project included in the application. This lack of transparency continues to cause confusion and project fear among local residents, myself included.

**2. How long is this licence for?** The application requests a 10 year licence, yet within the application notes, it states the licence is only to be granted for a maximum of 3 years! Please clarify whether this licence will be granted for 3 years or 10 years!

**3. Non Technical Summary is out of date.** Within the applicants submitted Environmental Information, the non-technical summary was produced in 2010. This is far out of date and does not comply with legal requirements for EIA.

**4. The brine dispersion model has not accounted for Storm Surges.** Particularly alarming, considering the recent storms.

**5. The many, many inconsistencies between the Application and the Environmental Assessments.** These inconsistencies are not only alarming but are insufficient to proceed with the consultation process.

**6. Portmuck is an ASSI.** Why is this not been included in the applicants assessment on impacts to designated sites? This site is functionally linked to the proposed brine discharge point.

**7. The Gobbins is an ASSI.** Why is this not been included in the applicants assessment on impacts to designated sites? This site is functionally linked to the proposed brine discharge point. Both the Gobbins and Portmuck list breeding seabirds to qualify as an ASSI. Both areas are key tourist attractions and make important contributions to our local economy.

8. Portmuck offers one of the best viewing platforms for **Harbour Porpoise** in Northern Ireland which lies within the North Channel SAC. **Source:**

<http://archive.jncc.gov.uk/default.aspx?page=7242>

- Listed as a UK Priority Species
- Protected under schedule 5 of the Wildlife (Northern Ireland) Order 1985
- Listed in Annex A of EU Council Regulation 338/97 and therefore treated by the EU as if they are on CITES, Appendix I, thus prohibiting their commercial trade

Listed on Appendix II of CITES

- Listed in Appendix II of the Convention on the Conservation of Migratory Species (The Bonn Convention)
- Covered by the terms of The Agreement on the Conservation of Small Cetaceans of the Baltic and North Seas (ASCOBANS)
- Listed in Appendix II of the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention)
- Classified as Vulnerable on the IUCN 2002 Red List
- Listed in Annex II and IV (Animal and Plant Species of Community Interest in Need of Strict Protection) of the EC Habitats Directive

**9. Construction of the project and brine outfall pipe has serious potential to cause a Temporary or Permanent Threshold Shift to harbour porpoise, grey seals and fish.**

The applicant has not submitted a survey considering these mammals and fish. Nor has the impact of underwater noise and vibration from the formation of the caverns been assessed.

**10. The submitted bird survey is completely inadequate.** So much so, reading the report brings a genuine tear to my eye. The RSPB have already pointed out these inadequacies in their letter of opposition and expertly drawn your attention to the inaccurate record these surveys produced namely the wrong time of year for foraging seabirds at the site area. As a local resident, and keen birdwatcher I can strongly attest to this.

Clearly the application does not meet the requirements of the EIA Directive or Habitats Directive. On this basis the application should be denied.

Thank you for taking the time to read the concerns of a local resident.

With warm regards,

[REDACTED]

On Thu, 6 Feb 2020 at 13:48, [REDACTED] <[REDACTED]> wrote:

[REDACTED]

Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast,  
BT7 2JA

6th February 2020

Dear Sir / Madam,

Re: Islandmagee Energy Marine Licence Consultation ML 28\_12

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, apart from a private company making money, why is there a need for this project? I can see no acceptable reason for taking any risks with the environment. With the NI Assembly voting in favour of declaring a Climate Emergency, the assembly has recognised that we are facing a climate breakdown and a biodiversity crisis! The executive has been called upon to fulfil climate action and our environmental commitments.

MLA's have called for an Independent Environmental Protection Agency to be established within the next 12 months, given the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise. As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

Bringing your attention to the consultation documents submitted; Ecological Survey for Birds document whereby it stated that 18 hours of surveying had taken place to comprehend this report and suggests in 3.3.1.1 that *'Only one record of a single Common Tern was recorded during survey. The bird was observed flying through the survey area on 30th July. Previous surveys and tracking data showed that tern species tended to avoid the area identified as potential zone of influence of a brine outfall for feeding'*.

As a resident of Mullaghboy, I walk around Portmuck, Browns Bay & Skernoghans Point, daily, year-round, observing the wildlife throughout the seasons and I strongly object to the validation of this report as a comprehensive account. Please take on board it is noted in this report that Early Breeding season was not surveyed for the purpose of this report. Throughout April/May each year, I concurrently bear witness to hundreds of Common Tern and Gannets plunge diving to feed on the abundance of herring shoals to this area, which in turn is used to feed their young during the early breeding nesting season.

The common skate is listed as **Critically Endangered** on the IUCN Red List and a protected species in Northern Ireland. It is a Priority Species under the UK Post-2010 Biodiversity Framework. What consideration has been given to the Common Skate in the area that will be directly affected by the discharged brine?

As a resident, I view this proposal as detrimental to the environment in this special and beloved area. What provisions are being put in place for the residents of Islandmagee should this environmental vandalism be allowed to go ahead? Infrastructure? Noise

Pollution? There has been very recent seismic activity in the area adding to the risk of a rupture or damage to the proposed underground caverns (see reference 1. below)? Insurance brokers have stated that home insurance in this area will rise due if this project goes ahead. The health and wellbeing of the residents are being put at risk so that shareholders of this project can make money. I heavily invested to live in this area that housed these sensitive and protected environmental habitats.

1. <https://www.insn.ie/2019-12-18-m1-6-offshore-antrim/>

Yours sincerely,

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

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas Caverns Public Consultation ML-28-12  
**Date:** 23 March 2020 11:05:13

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I refer to the notice issued by Islandmagee Energy company advising that the final consultation event has been cancelled due to the impact of the COVID 19 pandemic.

In view of this decision, which I fully understand and support, it would be more prudent to extend the consultation period and to subsequently re-arrange this event to enable members of the public to discuss the proposals in detail with consultants and officials from DAERA.

In addition I think it would be helpful if the presentation boards were made available online on the DAERA website during this extended consultation period to provide more informed feedback. Particular emphasis should be placed on the more contentious areas relating to the ecological and environmental effects and duration over which this is anticipated.

The extension period should be for at least the length of time that restrictions and guidance on social distancing remain in force. The final postponed consultation event could be re arranged within 2 weeks of restrictions being lifted and the overall public consultation period closed the following week.

I look forward to hearing from you and hope that the applicant will also be supportive of this proposal.

Regards

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Objection letter re Islandmagee energy marine license consultation ML 28 -12  
**Date:** 25 March 2020 09:37:19

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To whom it may concern  
Could you please answer the following questions

- \* Where are the caverns actually sited? It is unclear.
- \* There appears to be nothing about noise or vibration in Larne Lough during making the caverns how will it impact on wildlife and people living nearby?
- \* How long does the Marine Licence last for is it 3 or 10 years? How will we know?
- \* Would it be possible to have one current easy to read environmental statement not 6 documents where the non-technical summary is 10 years out of date?
- \* The Gobbins and Portmuck and others ASSI's are not included why not? They are very important to tourists wishing to see our healthy bird colonies including puffin and are there to protect our diverse ecosystems.
- \*The bird survey was only for four months. Is this not totally inadequate?
- \* What about fishing, kayaking; sailing; swimming; rowing and all uses that the sea is used. How do people know that they will be safe?

It was a shame that the open meeting was cancelled, but understand why.

Thanks  
[REDACTED]

Resident in Whitehead



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Objection letter  
**Date:** 25 March 2020 09:55:10

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Re:  
Islandmagee energy marine license consultation ML28\_12

**To whom it may concern.**

It was a shame that the recent meeting was cancelled.

I am writing as a concerned local resident as I feel that many questions have not been sufficiently answered, and that research into the effects seem to have been short term and therefore not reliable or viable.

Where are the caverns actually cited - it is unclear. Please can you clarify.

There appears to be nothing about noise or vibration in Larne Lough during making the caverns. How will it impact on wildlife and people living nearby? I am concerned about the marine environment being altered. Please can you tell me what research has been done into this.

How long does the Marine Licence last for - I have been informed it could be 3 or 10 years? Please can you tell me.

Would it be possible to have one up to date environmental statement? I am told that 6 documents were written and that a non-technical summary is 10 years out of date?

The Gobbins and Portmuck and other ASSI's are not included. They are very important to tourists wishing to see our bird colonies including puffin. We must protect our diverse ecosystems. The bird survey was only for four months. This is inadequate. Please can you explain why at least 1 year was not carried out.

What about fishing, kayaking, sailing; swimming, rowing and all other uses. How do people know that they will be safe? Please can you expand on this.

Thank you for your consideration and I look forward to hearing your replies to my queries.

With regards,

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Energy Project ML28-12  
**Date:** 25 March 2020 12:35:16

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Dear Sir/Madam

Further to our previous letter and following the cancellation of the last consultation meeting, concerning the above project application by Islandmagee Energy, we have a number of further concerns still outstanding with regards to this project and wish to further register our objections.

There is a notable lack of clarity in the consultation documents, which make it difficult to marry together the content of each submission and give a clear understanding of the full project. There are also certain inconsistencies and conflicting information.

Ordinance survey maps, detailing the exact location of the caverns have not been made available and in fact the application states that the location is as yet unknown. Original literature sent to Islandmagee residents show three possible sites for caverns. However the company have spoken of a possible 7-10 caverns, without clarifying where these will be located. The license period is also uncertain-is the application for 3 or 10 years and is this dependent on the number of caverns?

Construction methods are likewise ill defined, with three possible methods mooted. Surely at this stage, one clearly-defined construction method should have been submitted in the planning application? Similarly, the applicant seems to be unsure of the exact cubic capacity of each cavern and does not seem to have taken into consideration other significant factors, such as noise and impact of underwater vibration on marine life or indeed a range of other projects in the area such as the Cloghan Point application, Mullaghboy Sewage Works, the effects on tourism to the Gobbins Path or marine traffic to the Port of Larne itself. Furthermore, given the UK shift away from fossil fuels, who will take responsibility for the lifetime maintenance of these caverns once Islandmagee Energy no longer finds them financially viable?

We are both professional people, one of us in the construction and planning industry and we believe there should be one single composite document to facilitate understanding by the general public, which answers all the concerns. In light of the severe environmental impact of such a project, precautionary measures should apply and for that reason we believe there should be a public enquiry as under Regulation 17 of the Water Abstraction and Impoundment (licensing) Regulations (Northern Ireland) 2006 the department has the power to order a public enquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

For the above reasons, we believe the application documents submitted do not meet the requirements of the EIA Directive or the Habitat Directive and that the application by Islandmagee Energy should either be refused or the applicant should be required to submit further environmental information in a fresh application.

Thank you for your attention. We look forward to receiving your response at your earliest convenience.

Yours sincerely

[REDACTED]

Sent from my iPhone

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas Storage Project Consultation ML 28\_12  
**Date:** 25 March 2020 12:47:54

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Dear Daera Team

I write to state my objection to the proposed Islandmagee Gas Cavern project.

The application submitted is not in correlation with environmental protections and guidelines already set in place. It is also a high risk project and has no strategic value. It seems only to benefit business aims and to strongly hinder regulated environmental protections.

The consultation opportunities have been carefully staged and I never got any straight answers, rather, a lot of indirect waffle & I still feel that this project is completely wrong, unjustified & even immoral

Yours faithfully

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** ML28\_12  
**Date:** 25 March 2020 14:00:14

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[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Email: [REDACTED]

Dear Marine Licensing Team.

I have a significant number of concerns with regards to the Islandmagee Energy project ML28\_12 and wish to convey my objections listed below;

1, The public consultation documents appear to be heavily lacking in clarity. Although I am very well educated and conversant with reviewing various documents, I am finding it difficult to marry together the content of each separate submission in order to establish a clear understanding of the project in its entirety.

Should there not be a single composite document to facilitate use by the general public and shareholders?

2. There are several inconsistencies and conflicting information found between the various documents, thus making it difficult to ascertain what the precise plans are, so I'm asking, what are they?

3. I believe there should be a public inquiry, as under Regulation 17 of the Water abstraction and Impoundment (licensing) Regulations (Northern Ireland) 2006, the Department has the power to order a Public inquiry for the purpose of evaluating representations made as a result of a Public consultation exercise.

4. I believe the project to be unnecessary nor sensible because of the huge environmental risks and potential impacts both on land and at sea, with the admission by Islandmagee Energy of a dead zone in a dSAC, designated for Harbour Porpoise. Why is this going to be allowed to happen?

5. This application does not include any Ordinance Survey maps detailing the exact location of the Caverns as required, but in fact this application states that the exact location is as yet unknown. So, who does know?

6. Why has Portmuck Assi and The Gobbins Assi not been taken into consideration?

7. The impact of underwater noise from vibrations generated from the solution mining process has not been assessed, is there a reason for this?

8. What is the exact cubic capacity of the caverns? I can see no mention of this.

9. There seems to be no clear programme for the de-commissioning of the caverns. What is the precise plan for this? Who will take full responsibility for the lifetime maintenance of the caverns once Islandmagee Energy receives no commercial benefit from them?

This application should either be refused or the applicant should be asked to submit further environmental information and a fresh application.

Thank you for your attention and I look forward to receiving your response.

Yours Faithfully

A solid black rectangular redaction box covering the signature area.

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Energy Project  
**Date:** 25 March 2020 16:02:33

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Get [Outlook for iOS](#)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Email: [REDACTED]

Dear Marine Licensing Team.

I have a significant number of concerns with regards to the Islandmagee Energy project ML28\_12 and wish to convey my objections listed below;

1, The public consultation documents appear to be heavily lacking in clarity. Although I am very well educated and conversant with reviewing various documents, I am finding it difficult to marry together the content of each separate submission in order to establish a clear understanding of the project in its entirety.

Should there not be a single composite document to facilitate use by the general public and shareholders?

2. There are several inconsistencies and conflicting information found between the various documents, thus making it difficult to ascertain what the precise plans are, so I'm asking, what are they?

3. I believe there should be a public inquiry, as under Regulation 17 of the Water abstraction and Impoundment (licensing) Regulations (Northern Ireland) 2006, the Department has the power to order a Public inquiry for the purpose of evaluating representations made as a result of a Public consultation exercise.

4. I believe the project to be unnecessary nor sensible because of the huge environmental risks and potential impacts both on land and at sea, with the admission by Islandmagee Energy of a dead zone in a dSAC, designated for Harbour Porpoise. Why is this going to be allowed to happen?

5. This application does not include any Ordnance Survey maps detailing the exact

location of the Caverns as required, but in fact this application states that the exact location is as yet unknown. So, who does know?

6. Why has Portmuck Assi and The Gobbins Assi not been taken into consideration?

7. The impact of underwater noise from vibrations generated from the solution mining process has not been assessed, is there a reason for this?

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This application should either be refused or the applicant should be asked to submit further environmental information and a fresh application.

Thank you for your attention and I look forward to receiving your response.

Yours Faithfully

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



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** FW: GAS CAVERNS ISLANDMAGEE,  
**Date:** 25 March 2020 16:29:43

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** 25 March 2020 16:21  
**To:** [REDACTED] <[REDACTED]>  
**Subject:** GAS CAVERNS ISLANDMAGEE,

GAS

CAVERNS ISLANDMAGEE.

Dear Sir/ Madam.

All reports submitted do not set out APPORITATE MITIGATION MEASURES, to address the GYPSUM LEGACY issues affecting the site including any necessary Remedial works and/ or DEMONSTRATE how mining issues have influenced the proposed Development. The former is not addressed SPECIFICALLY . Mitigation measures and INVESTIGATION measures are only discussed in GENERAL TERMS And are not set out correctly.

The investigation of the works would require Different investigation techniques to ensure adequate definition , and these have not been Discussed in detail or how they would be applied . THE LATTER IS NOT ADRESSED.

ALL INFORMATION IN THE FORM OF A RISK ASSESSMENT WHICH ADRESSES THE HAZZARDS POSED BY THE UNDERGROUND SALT EXTRACTION AND WORKINGS, CAN NOT BE APPROVED BY A PRE-CONDITION. This type of assessment needs to be carried out PRE-PLANNING APPROVAL, so that DAERA can SUFFICIENTLY ASSESS THE FEASIBILITY OF THE SITE FOR SUCH A DEVELOPMENT.

1. Prove the ground model of the Gypsum seams in the Cavern site areas.
2. Prove the risk rating for the aera within the application [ including the power station and the Ferry Row houses ] of the Gas Emissions from the caverns along proven ground Fractures.
3. Prove and show existing detailed recommendation for intrusive and none intrusive site investigation works and detailed MITIGATION Strategy give by DAERA IN PREVIOUS PLANNING ON THIS PROPOSAL.
4. RECORDS SHOW FROM OTHER GAS CAVERNS , COLLAPSE OR GROUND MOVEMENT ASSOCIATED WITH CAVERNS WORKINGS, SHAFTS AND ENTRIES , SHOW DAERAS FINDINGS ON THIS THAT DAERA HOLDS ON FILE FROM THE PREVIOUS PROPOSAL

5. Prove there is no GAS EMISSIONS FROM CAVERNS TO OTHER ADJACENT PROPERTIES , POWER STATION AND P&O SHIPPING PROPERTIES , FROM UNDERGROUND SOURCES THROUGH GROUND FRACTURES, ALREADY SHOWN IN GSNI ARCHIVES.
  
6. Specify / zone risk and reporting on how this risk has been delivered.

regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Date:** 25 March 2020 18:31:31

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24 March 2020

The Marine Licensing Team

Dear Sirs

I am a regular visitor to Island Magee and I have read the public consultation documents with respect to the Island Magee Energy Project ML28\_12 and have many questions and concerns. I detail below the key issues for me in the scrutiny of a project application which seems very incomplete and has many inconsistencies.

1. My overall analysis of the project is that it is not required in NI and will have a detrimental environmental impact and economic impact.
2. The area for the proposed project is rich in wildlife and is an increasing tourist magnet. I am unable to ascertain from the documents published how close the site will be to designated environmental sites. The application refers to a plan covering this, which I have not been able to locate. Does this exist?
3. I understand that the application and environmental statements indicate that there will be further detailed design work –is this be available? Can Daera confirm that this application only covers the works that are required for the design phase? Will the next phase of the project will be the subject of a further application and environmental impact statement? The lack of the full picture here is alarming.
4. The applicant states the works will take 10 years, yet the licence is normally only granted for no more than 3 years. Which is this application for?
5. Where exactly will the caverns be? I cannot see any specific detail of location plans showing their location. The plan attached the application document is very rudimentary, with no orientation points or scale.
6. What is the actual depth of the caverns? I have rear and re read the documents and see references to a range of depths from 1350- 1500m, yet the application refers to 1700m . The variation in the range here is significant, and the imprecision is concerning.
7. I was unable to understand how the pumps will go from the pump house to the sea bed and how they will be designed and constructed. Is this information available?
8. I note the non-technical summary on the website is 10 years old and out of date. Is there an up to date summary available as my understanding is that all environmental statements have to be accompanied by a non-technical summary that is accessible to all.
9. I have read in detail the objections raised by the key Environmental groups in Northern Ireland under the umbrella of the NI Marine task force and see compelling evidence to turn down this application in their submissions. Nothing in the application gives me any information to counter that view.

In summary, there are so many inconsistencies and omissions from the material published that I am unable to submit a response until I have clarity on these points. If the Department are unable to resolve these queries then I request that you should refuse this application or ask the applicant to withdraw their application and submit a fresh one which addresses these issues and has an

easy to understand single environmental statement with a non-technical summary. Yours  
faithfully [REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas Storage Project ML 28\_12  
**Date:** 25 March 2020 23:28:38

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24th March 2020

Dear Sir / Madam

Re Islandmagee Gas Storage Project ML 28\_12

I am writing with regard to the above project and I'm trying to understand the full implications of the disturbance to the environment and wildlife that would occur as a result of the project going ahead.

I have read the response submitted by the Northern Ireland Marine Task Force and I am concerned about all of the points that they have raised.

For example, the design for both the brine outfall pipeline and the intake pipe as described in the Construction Method Statement<sup>9</sup> (CMS) does not match that which is assessed in the Marine Environmental Conditions Update and subsequently considered within the shadow HRA.

The bird surveys were not carried out at the appropriate time of year to obtain an accurate record of the usage of the site by foraging seabirds. Additionally, previous surveys carried out for the site are now notably out of date and cannot be considered as a basis for determining whether the proposed discharge site is of importance to foraging seabirds.

The applicant has stated within their application documents that tern species tend to "avoid" the proposed brine discharge location<sup>22</sup>. The applicant has used the results of their surveys as well as the Wilson et al. (2014)<sup>23</sup> report to support this assertion. As the RSPB stated in their submission, the updated surveys that the applicant has presented are not capable of showing tern foraging areas and behaviour in the vicinity of the proposed discharge area, so this cannot support the applicant's assertion of avoidance.

The applicant has not included Portmuck ASSI or The Gobbins ASSI into their assessment on impacts to designated sites<sup>24</sup>. Both of these sites list breeding seabirds within their qualifying features and include razorbill, guillemot and kittiwake among others. Given the fact that both sites are functionally linked to the proposed discharge area, this appears to be a major omission.

With regard to the survey of marine mammals, we note that the Applicant has used data obtained from CEDaR as opposed to carrying out their own survey of marine mammals. I feel that this is inadequate with regard to providing up to date and comprehensive data, especially given the location within the North Channel SAC in which the qualifying feature is harbour porpoise.

In light of the above, I would object to the present application and suggest that the applicant withdraw their application and submit a fresh application which clearly addresses these issues.

Yours faithfully

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Energy Marine Licence Consultation ML28\_12  
**Date:** 26 March 2020 08:27:59

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

26/03/2020

Dear Sir / Madam

I have examined the public consultation documents in relation to the above consultation and wish to strongly object to the project and marine construction licence.

I believe there should be a public inquiry as, under Regulation 17 of the water abstraction and Impoundment (licensing ) regulations (Northern Ireland ) 2006, the department has the power to order a public inquiry for the purpose of evaluating representations made as result of a public consultation exercise .

I believe the project to be unnecessary nor sensible, in light of the huge environmental risks and potential impacts both on land and at sea, with the admission by the company of a dead zone in a dSAC, designated for harbour porpoise and would admonish that in my opinion, the precautionary principle should apply.

The Environmental Information which accompanies the application is spread over six separate documents. The non-technical summary relates only to an Environmental Statement produced in 2010. There is no updated, single composite environmental statement with an updated non-technical summary. This is a paper chase and is contrary to the legal requirements for EIA;

The Environmental Information which accompanies the application, does not reflect or assess what is proposed in the application documents. For example the phasing of the leaching of caverns is different;

For these reasons the application is invalid and does not comply with the legal requirements of an environmental impact assessment;

The consultation process is also flawed as there is insufficient information to make informed and reasoned comments.

The application document dated December 2019 is inconsistent with the Environmental

Information submitted in support of the application.

The design for both the brine outfall pipeline and the intake pipe as described in the Construction Method Statement (CMS) does not match that which is assessed in the Marine Environmental Conditions Update and subsequently considered within the shadow HRA.

In respect of the brine outfall pipeline, the CMS states that “The HDD is expected to break the seabed surface at a distance of some 300-350m offshore with the remaining 100-150m of outfall laid on the seabed with rock mound protection”. The Marine Environmental Conditions Update and the original ES, it is consistently stated that the HDD will break out at, or close to, the outfall point. The shadow HRA states that the pipe section will only be approximately 40m in length. The environmental impacts of the application have not therefore been assessed.

The applicant has not included Portmuck ASSI or The Gobbins ASSI into their assessment on impacts to designated sites. Both of these sites list breeding seabirds within their qualifying features and include razorbill, guillemot and kittiwake among others. Both sites are functionally linked to the proposed discharge area.

The omission of any assessment of the potential impacts on the Gobbins ASSI is particularly striking given the importance of the Gobbins cliff top path. A key feature of the cliff top path is the opportunity to see rare seabirds and other sea life. Tourism is an important and legitimate use of our sea and makes an important contribution to our local economy.

Thank you for taking the time to consider my objections & concerns and I look forward to receiving your response at your earliest convenience.

Yours faithfully

[Redacted signature]

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[Redacted line]

[Redacted line]

[Redacted block]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Energy Project ML28\_12  
**Date:** 26 March 2020 09:38:06

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[REDACTED]

Dear Marine Licensing Team,

As a resident of Islandmagee I am writing with a number of concerns regarding the Islandmagee Project ML28\_12.

First of all it seems there are no ordinance survey maps included in the application and I am still in the dark as to where the exact location is to be and details such as the actual size of the caverns (capacity) and who is going to take responsibility for the lifetime maintenance of them are not evident. It is also unknown how long the licence period is for, is it 3 or 10 years?

It is difficult to glean information from the public consultation documents as there appears to be inconsistencies and conflicting information and I feel one document should be made available for the general public so that they can be much better informed.

As I live in Portmuck, I am deeply worried about the impact this construction will have on our environment. There does not appear to be an updated Environmental Statement; the last being a decade ago. I feel the Portmuck ASSI has not been taken into consideration and as I live overlooking Portmuck I have daily evidence of the abundance of wildlife that will possibly be affected by the brine dispersion, which will inevitably affect the food web. The Gobbins and Portmuck are both breeding grounds for seabirds such as guillemots, kittiwake, razorbills among others. There has not been a fully updated bird survey and it seems the last survey was at a time of year that would not reflect the usage of the site by foraging seabirds. There are six documents of Environment Information accompanying the application and as I mentioned before, there is no updated, single composite environmental statement with an updated non-technical summary and as such this is a paper chase and is contrary to the legal requirements for EIA.

I do not believe the application provides concise information for the general public or the stakeholders and therefore does not meet the requirements of the EIA Directive or the Habitats Directive. I think the application should be refused or at least updated environmental information should be submitted and a fresh application be made.

I look forward to hearing from you soon with your response.

Yours faithfully,

[REDACTED]



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Consultation ML28\_12  
**Date:** 26 March 2020 10:55:57  
**Importance:** High

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Good Morning

Could you please advise when the consultation for the above application ends.

On your website in grey background it states closing date 27 March 2020 at 17.00 however in the How to respond section beneath the project description it states, please note the closing date for responses is 26th March 2020

Thanks

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Objection to Issue of Marine Licence- For Islandmagee Energy for Larne gas storage project  
**Date:** 26 March 2020 12:29:59

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Dear Sir/Madam

In having received no reply or correspondence from my previous email([REDACTED]), I wish to submit the following points for your consideration and note my objection to the 'Larne lough gas cavern and storage' project.

1.

No map/plan for such reg12(1) Marine Works(EIA)Regulations. Under sea-'land'  
Marine licence for under sea—Is there a separate application for under land?

How long is the licence for—10yrs- 3yrs?? Application requests 10yrs, but notes which

accompany application state grant is for max 3yrs—Department must clarify.

2.

2010 was the last update environmental statement related to within the 'non technical summary'. Nothing updated since then for either the Environment statement or non technical summary??? All spread across numerous documents—far from being open and clear.

3.

Where can members of the public- and the department- clearly see and understand what is being proposed, how it will be constructed, and then oversee a true and real Environmental Impact Assessment of its workings.

The Construction Method Statement describes design for 'outfall' and 'intake' pipes and pipeline. This does not match with the Marine Conditions Update within the shadow HRA.

le brine outfall to break out some 400-450mts off shore with last 40mts on seabed..... but other information states it will break out some 300-350mts out with seabed pipe running last 100-150mts protected by rock mound...???

For the 'intake'. three different constructions, the third one added with a completely different approach, running on seabed and has not been assessed for potentially different impacts to the marine environments.

4.

The brine dispersion model has not accounted for storm surge. And not taken into account the local knowledge of the continually revolving eddies.

The bird survey data presented is inadequate to say the least. Was this survey even carried

out at appropriate time of year

Previous surveys carried out at the discharge site are now so out of date – they should not be considered for determining with above point also in mind.

The impact of underwater noise and vibration during construction/formation of the caverns has not been assessed.

The impact of noise, vibration, and sound frequency has not been assessed at the outfall and its diffuser .

Neither the Gobbins ASSI nor Portmuck ASSI has been assessed on adverse impacts on a huge range of species both above the water and below within these two designated sites

My conclusion:-

With the afore mentioned points and the numerous other inconsistencies between The application documents and the Environmental assessments- this does not meet the requirements of the EIA Directive or the Habitats Directive.

This application should either be refused or the applicant should be asked to submit further environmental information and a fresh application.

In anticipation of a reply to the above matters.

Kind Regards



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Energy Project ML28\_12  
**Date:** 26 March 2020 16:37:42

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Dear Marine Licensing team

I am writing about the Islandmagee Energy Project ML28\_12 public consultation documents. As a frequent visitor to Islandmagee I have many questions and concerns. Viz

1. The project will have a detrimental environmental and economic impact.
2. The area for the proposed project is key for local wildlife and is increasingly a tourist attraction. It is unclear from the documents published how close the site will be to designated environmental sites. A plan does not appear to be included in the application despite being referred to.
3. Can Daera confirm that this application only covers the works that are required for the design phase? Will the next phase of the project will be the subject of a further application and environmental impact statement? There is a clear lack of detail in the application.
4. The applicant states the works will take 10 years, yet the licence is normally only granted for no more than 3 years. Which is this application for?
5. I cannot see any specific detail of location plans showing the location of the caverns. The plan attached the application document is too basic for proper appraisal.
6. Detail regarding the depth of the caverns is inconsistent in the application. The documents refer to a range of depths from 1350- 1500m, yet the application refers to 1700m.
7. There is insufficient information the design and functioning of the pumps. Is this information available?
8. The non-technical summary on the website is 10 years old and requires updating.
9. I note the objections raised by the key Environmental groups in Northern Ireland under the umbrella of the NI Marine task force and see compelling evidence to turn down this application in their submissions.

In summary, there are many inconsistencies and omissions in the material published. The applicant should withdraw the application and resubmit addressing these issues including a single environmental statement with a non-technical summary.

Yours sincerely

[REDACTED]



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**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee gas caverns  
**Date:** 26 March 2020 17:44:24

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[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Post: Marine Licensing Team,  
Marine and Fisheries Division,  
Department of Agriculture, Environment and Rural Affairs,  
1st Floor Klondyke Building,  
Cromac Avenue,  
Belfast, BT7 2JA

Email: [REDACTED]  
January 2020

Dear Sir / Madam,

**Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12**

With reference to the Marine Construction Licence application 2019 Consultation ML 28\_12 by Islandmagee Energy / Infrastrata for the proposal to create 7 underground caverns by solution mining below Larne Lough for the storage of natural gas, which includes the associated marine infrastructure to enable seawater abstraction and the subsequent discharge of brine from the creation of the caverns by solution mining, I have examined the public consultation documents and I wish to object strongly to the project and the Marine Construction Licence.

Firstly, no evidence of need for the proposal has been released for public consultation, and I believe the project to be unnecessary with huge environmental impacts, both in the scale and associated risks of the underground caverns, the environmental impact on land and at sea, with the admission by the Company of the dead zone in a dSAC, designated for Harbour Porpoise.

As a member of the public with serious concerns, I believe there should be a public inquiry, as Under Regulation 17 of the *Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006*, the Department has the power to order a public inquiry for the purpose of evaluating representations made as a result of a public consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine Construction Licence as per the Public Consultation for the following reasons:

*I can see no benefit in any way to this project other than shareholder bank accounts. The thinking for the future of this project appears only to be profit based ; no different to storing goods for onward sales with profit.*

*If this was a form of energy that had any green credentials,we as residents,past,present and future would not be objecting so strongly.*

*For decades Scandinavia and other fellow advocates have researched and developed several green means of countrywide energy sources including wind,wave,solar and bio fuels applied successfully to achieve workable systems such as city generators serving heat and power. Countrywide composting systems which in turn create heat and power and vast employment opportunities, alongside power storage systems ,locally powered and stored allowing communities to soley benefit without lacing the bank accounts of large outside businesses.*

*As for the environmental consequences involved in such a project the facts stand for themselves : no renewable energies being, no benefit to locals or the planet as a whole.In fact , there is only negative consequences for life around the area of Islandmagee,Ballystrudder,Ballycarry,Whitehead,Magheramorne,Glynn, Larne further up and down the coast and beyond.Further more you have the financial domino effect starting with housing,transport,tourism,and local businesses in all sectors being affected by this projects non environmentally friendly operations as a blight on an amazing part of Ireland for profit.*

*Perhaps the members of this company can think about where they grew up ,or holidayed or any other special place in their memory and their reaction to see it mined, poluted, maybe even destroyed as this project threatens the pasts, the presents and the futures of all the generations that have and still do call these areas their home.*

*kind regards*



Sent from my Samsung device

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Objection to Islandmagee Gas Storage Project  
**Date:** 26 March 2020 18:03:39

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[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Ref : ML28\_12

Dear Sir /Madam

I have lived in Islandmagee with my family for many years and wholeheartedly oppose this project in light of many considerations .

Primarily our family are keen members of our sailing club and are very much concerned about the safety aspect of sailing over the areas where the caverns have been suggested to be mined.

### **Evidence of stakeholders consulted**

I would be keen to review stakeholder consultations , especially those with local sailing , kayaking & diving clubs.

Please can you advise where I might find this information ?

### **Cavern construction team not available during PC**

At the public meetings with Islandmagee Energy there has not been any of the cavern construction team in attendance to discuss concerns and questions.

Considering the numerous risks entailed surely a qualified consultant should have been available to clarify all aspects of this element of the project ?

### **Location of caverns**

According to the project application this is not yet fully determined and could be



under the lough or the land.

Is it acceptable to not know where these caverns will be ?

### **Impact on food web within an SAC**

With an acknowledged benthic dead zone as a result of brine dispersion into a designated SAC for harbour porpoise , is it lawful or responsible to deliberately risk interference with food web ?

### **Gobbins or Portmuck ASSI not taken into account**

Both of these specifically designated areas are cherished for the myriad of marine mammals , birds , flora and fauna and are proven prime locations of interest to both local residents and thousands of annual visitors who travel here from many global spheres.

Is it acceptable that these important areas of scientific and vital tourism based interest have been ignored ?

### **Time frame of licence**

The documents are not clear - is this a 3 or 10 year licence application ?

### **Not sensible or necessary**

- 1 - Environmental risks and potential impacts both on land and at sea
- 2 - Admission by the company of a dead zone in a dSAC, designated for harbour porpoise
- 3 - Safety risks due to cavern construction and gas storage within an area containing fault lines and has not been explored by GSNI & HSENI , since recent seismic activity
- 4 - Unlicensed dredging within a SAC
- 5 - There is no strategic proven need for gas storage in N.Ireland

Is it acceptable to risk harm to humans , food web and seas ?

Is it acceptable to risk harm for a project that has no strategic value ?

### **Missing environmental zone maps**

According to your own requirements , ordinance survey maps detailing and outlining all of the specific environmental areas were to have been included in the public consultation documents . These were not made available . Why not , surely

the public and daera have a right to see and understand the areas likely to be impacted by the project ?

### **Bird survey incomplete**

The bird survey data presented is either extremely out of date or fails to be updated (2019) They are of extremely limited value in determining whether there are important bird foraging areas in the vicinity of the brine outfall. These surveys were not carried out at the appropriate time of year to obtain an accurate record of the usage of the site by foraging seabirds.

Do you intend to ensure a full bird survey is completed as was required ?

### **Inconsistent information**

Environmental Information which accompanies the application, does not reflect or assess what is proposed in the application documents.

### **Confusion re Three different construction methods for intake**

Is it acceptable that one clearly defined construction method has not been determined ?

### **Confusion re Cubic capacity of caverns**

The exact cc of the caverns is unclear due to conflicting information within the documents.

Is it acceptable to not know what volume of gas will be stored ?

### **Confusion re depth of caverns**

Throughout the documentation a variety of cavern depths are discussed. Having had completed the feed study why is this precise and vital information not determined ?

### **Confusion re phasing of leaching process**

The sequence in which caverns are to be leached is not clearly defined with the documents .

A variety of categories of the PC docs provide conflicting sequences to information provided within others .

Is it acceptable that essential information regarding elements of construction are

not clearly defined or determined ?

**Application is invalid**

For the reasons stated above the application is invalid and does not comply with the legal requirements of an environmental impact assessment;

**Consultation process is flawed**

As there is insufficient accurate information to make informed and reasoned comments.

I look forward to receiving your response.

Yours faithfully

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

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Objection to gas caverns at Islandmagee..  
**Date:** 26 March 2020 19:58:17

---

Dear Daera,

Please don't let the gas caverns get permission to be based at this most beautiful and ecologically important site.

Fishing is an important part of our local economy and is a legitimate use of the sea;

The Environmental Information presented confirms that there will be adverse impacts on a broad range of species;

Table 7-2126 of the Environmental Update Report shows "minor (adverse)" impacts from brine discharge on a broad range of species including fish, plankton, shellfish and benthic subtidal habitat with no mitigation proposed for any of these. While these impacts are considered to be minor, the fact remains that this application will have adverse impacts on a huge range of species within two designated sites.

The applicant has not included Portmuck ASSI or The Gobbins ASSI into their assessment on impacts to designated sites. Both of these sites list breeding seabirds within their qualifying features and include razorbill, guillemot and kittiwake among others. Both sites are functionally linked to the proposed discharge area. The omission of any assessment of the potential impacts on the Gobbins ASSI is particularly striking given the importance of the Gobbins cliff top path. A key feature of the cliff top path is the opportunity to see rare seabirds and other sea life. Tourism is an important and legitimate use of our sea and makes an important contribution to our local economy.

Construction of the seawater intake and brine outfall pipe has the potential to cause a temporary threshold shift (TTS) and permanent threshold shift (PTS) to harbour porpoise, TTS to grey seals and TTS to fish whereby hearing involves a swim bladder or other gas volumes (this may cause behavioural effects at individual or population level);

The bird survey data presented is woefully inadequate. It is either extremely out of date or fails to the updated (2019) bird surveys provided by the applicant and believes that they are of extremely limited value in determining whether there are important bird foraging areas in the vicinity of the brine outfall. These surveys were not carried out at the appropriate time of year to obtain an accurate record of the usage of the site by foraging seabirds.

Additionally, previous surveys carried out for the site are now notably out of date and cannot be considered as a basis for determining whether the proposed discharge site is of importance to foraging seabirds;

The link between vital ecosystem components such as fish and foraging birds has been omitted;

The impact of underwater noise and vibration from the formation of the caverns under Larne Lough has not been assessed; and

The brine dispersion model has not accounted for storm surges.

For the above reasons the application documents do not meet the requirements of the EIA Directive or the Habitats Directive. The application should either be refused or the applicant should be asked to submit further environmental information and a fresh application.

Yours sincerely,

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas Storage Project December 2019 Consultation ML 28\_12,  
**Date:** 26 March 2020 20:42:41

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Good Morning

I would like to take advantage of the extended consultation to fully review the very detailed technical report on the website and in regard to the comprehensive objections submitted by the NI Marine Taskforce.

Please see attached some further 16 questions that I would like answered.

In addition, I believe that it is vital that further Public Consultations should take place specifically for the caverns, at which HSENI, GSNI, Atkins, RPS, GL and any other contributors to the project, need to be present to answer questions from the public. as to the exact methods of construction, operation and decommissioning; the lack of subject matter experts was of particular note at the Public Consultation when the DAERA staff were unable to answer my questions on the geological issue.

Furthermore, there needs to be an updated Non-Technical Summary, as I am only one of a very large number of concerned residents and friends of Islandmagee who have found great difficulty in wading through the information, some of which changes through the document, and does not provide enough detail, for example (but not limited to):

- Exact locations of caverns, are they all under the sea? The documents do not give coordinates, some have neither a north pointer nor a scale.
- What depth are the proposed 7No caverns? There are references to [1350, 1500 and 1700 meters](#) (all of which are deeper than recommended guidelines). The documents are not specific and there does not appear to have been sufficient geological exploration to confirm the suitability of the area for cavern construction and safe operation. Some of the developers literature and information refers to 15No additional caverns; can you please confirm that any additional caverns will require a fresh/new application?
- What the initial application covers? Is the design for 3 years for detailed design after which a further application will be submitted, or will it be effectively a case of "carte blanche" for the developers to proceed, without further DAERA scrutiny or the opportunity for the public to be consulted.
- What will be the distance from the various designated environmental sites? The application form refers to a plan, which I have been unable to find, can you please advise where this is?
- What is the design for the sea water intake and the discharge outlet? What precautions will be in place during construction and how will fishing trawlers be prevented from damaging the outfall or fouling their nets?

If DAERA can't provide clarification or resolve the various queries, it should request the applicant resubmit their application with enough detail to respond/address the issues, including an up to date EIS and both technical and non-technical summaries.

Yours sincerely

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Objection letter Marine Licence  
**Date:** 26 March 2020 20:45:02

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Attn : Daera Marine licensing team

Ref : islandmagee Energy Marine Licence Consultation ML28\_12

Dear Sir,

I have examined the public documents in relation to the above consultation and wish to very strongly object to the project and marine construction licence. Thank you for taking this time to give my concerns due diligence and i look forward to receiving your response at your earliest convenience.

I believe there should be a public inquiry, as under Regulation 17 of the water abstraction and Impoundment (licensing ) regulations (Northern Ireland ) 2006, the department has the power to order a public inquiry for the purpose of evaluating representations made as result of a public consultation exercise .

I believe the project to be unnecessary nor sensible , in light of the huge environmental risks and potential impacts both on land and at sea , with the admission by the company of a dead zone in a dSAC, designated for harbour porpoise and would admonish that in my opinion , the precautionary principle should apply.

The Environmental Information which accompanies the application is spread over six separate documents. The non-technical summary relates only to an Environmental Statement produced in 2010. There is no updated, single composite environmental statement with an updated non-technical summary. This is a paper chase and is contrary to the legal requirements for EIA;

The Environmental Information which accompanies the application, does not reflect or assess what is proposed in the application documents. For example the phasing of the leaching of caverns is different;

For these reasons the application is invalid and does not comply with the legal requirements of an environmental impact assessment;

The consultation process is also flawed as there is insufficient information to make informed and reasoned comments.

The application document dated December 2019 is inconsistent with the Environmental Information submitted in support of the application.

The design for both the brine outfall pipeline and the intake pipe as described in the Construction Method Statement (CMS) does not match that which is assessed in the Marine Environmental Conditions Update and subsequently considered within the shadow HRA.

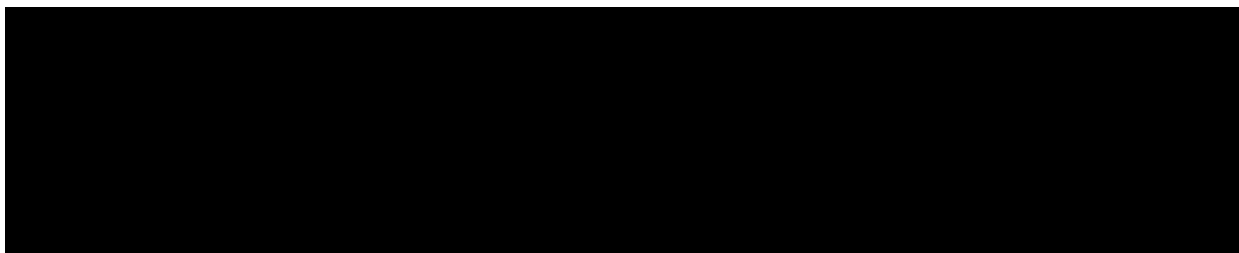
In respect of the brine outfall pipeline, the CMS states that “The HDD is expected to break the seabed surface at a distance of some 300-350m offshore with the remaining 100-150m of outfall laid on the seabed with rock mound protection”. The Marine Environmental Conditions Update and the original ES, it is consistently stated that the HDD will break out at, or close to, the outfall point. The shadow HRA states that the pipe section will only be approximately 40m in length. The environmental impacts of the application have not therefore been assessed.

The applicant has not included Portmuck ASSI or The Gobbins ASSI into their assessment on impacts to designated sites. Both of these sites list breeding seabirds within their qualifying features and include razorbill, guillemot and kittiwake among others. Both sites are functionally linked to the proposed discharge area.

The omission of any assessment of the potential impacts on the Gobbins ASSI is particularly striking given the importance of the Gobbins cliff top path. A key feature of the cliff top path is the opportunity to see rare seabirds and other sea life. Tourism is an important and legitimate use of our sea and makes an important contribution to our local economy.

Thank you for giving due diligence to my objections and concerns .

Yours faithfully

A large black rectangular redaction box covering the signature area.A small black rectangular redaction box covering a line of text.





**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee gas storage project.  
**Date:** 27 March 2020 08:25:03

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Good morning.

Sorry for asking a seemingly trivial question in these difficult (virus) times but sitting at home in lockdown drives one to look for other distractions. I hope this finds you all fit and well presumably working from home.

Could I enquire if the closing date of today still applies for the consultation given that the last public viewing was cancelled.

If the answer is affirmative, could I be so bold as to enquire how long the decision taking process is likely to be?

If, on the other hand, a further delay is required, will an announcement be forthcoming?

Thanking you in advance for any light you could possibly shed on the matter.

Stay well.

Regards

[REDACTED]

Sent from Samsung Mobile on O2

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Gas Taverns  
**Date:** 27 March 2020 09:14:46

---

Sent from my To DAERA  
Re Gas Taverns and Environmental Issues.

Fishing is an important part of our local economy and is a legitimate use of the sea; The Environmental Information presented confirms that there will be adverse impacts on a broad range of species;

Table 7-2126 of the Environmental Update Report shows “minor (adverse)” impacts from brine discharge on a broad range of species including fish, plankton, shellfish and benthic subtidal habitat with no mitigation proposed for any of these. While these impacts are considered to be minor, the fact remains that this application will have adverse impacts on a huge range of species within two designated sites.

The applicant has not included Portmuck ASSI or The Gobbins ASSI into their assessment on impacts to designated sites. Both of these sites list breeding seabirds within their qualifying features and include razorbill, guillemot and kittiwake among others. Both sites are functionally linked to the proposed discharge area. The omission of any assessment of the potential impacts on the Gobbins ASSI is particularly striking given the importance of the Gobbins cliff top path. A key feature of the cliff top path is the opportunity to see rare seabirds and other sea life. Tourism is an important and legitimate use of our sea and makes an important contribution to our local economy. Construction of the seawater intake and brine outfall pipe has the potential to cause a temporary threshold shift (TTS) and permanent threshold shift (PTS) to harbour porpoise, TTS to grey seals and TTS to fish whereby hearing involves a swim bladder or other gas volumes (this may cause behavioural effects at individual or population level); The bird survey data presented is woefully inadequate. It is either extremely out of date or fails to the updated (2019) bird surveys provided by the applicant and believes that they are of extremely limited value in determining whether there are important bird foraging areas in the vicinity of the brine outfall. These surveys were not carried out at the appropriate time of year to obtain an accurate record of the usage of the site by foraging seabirds.

Additionally, previous surveys carried out for the site are now notably out of date and cannot be considered as a basis for determining whether the proposed discharge site is of importance to foraging seabirds;

The link between vital ecosystem components such as fish and foraging birds has been omitted;

The impact of underwater noise and vibration from the formation of the caverns under Larne Lough has not been assessed; and

The brine dispersion model has not accounted for storm surges.

For the above reasons the application documents do not meet the requirements of the EIA Directive or the Habitats Directive. The application should either be refused or the applicant should be asked to submit further environmental information and a fresh application

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** ML28.12 Islandmagee Energy Marine Construction License Application #INFA  
**Date:** 27 March 2020 09:46:55

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Hi,

I believe that the economic argument outweighs the ecological argument but only given the safeguards that are built into this program and which will doubtless be properly overseen and scrutinised by the DAERA-NI to ensure the best possible outcome on these important considerations (Eco vs Econ).

The value of the ongoing works, jobs, supply chain locally and numerous spin off benefits alongside the H&W interest in Infrastrata PLC can be realised if the ML is granted; getting some good news in amongst the tirade of bad currently would be hugely beneficial to all involved and in the area.

Thanks

[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Objection to Islandmagee Gas Storage Project  
**Date:** 27 March 2020 10:08:07

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[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Ref : ML28\_12

Dear Sir /Madam

I have lived in Islandmagee with my family for many years and wholeheartedly oppose this project in light of many considerations .

Primarily our family are keen members of our sailing club and are very much concerned about the safety aspect of sailing over the areas where the caverns have been suggested to be mined.

### **Evidence of stakeholders consulted**

I would be keen to review stakeholder consultations , especially those with local sailing , kayaking & diving clubs.

Please can you advise where I might find this information ?

### **Cavern construction team not available during PC**

At the public meetings with Islandmagee Energy there has not been any of the cavern construction team in attendance to discuss concerns and questions.

Considering the numerous risks entailed surely a qualified consultant should have been available to clarify all aspects of this element of the project ?

### **Location of caverns**

According to the project application this is not yet fully determined and could be under the lough or the land.

Is it acceptable to not know where these caverns will be ?

### **Impact on food web within an SAC**

With an acknowledged benthic dead zone as a result of brine dispersion into a designated SAC for harbour porpoise , is it lawful or responsible to deliberately risk interference with food web ?

### **Gobbins or Portmuck ASSI not taken into account**

Both of these specifically designated areas are cherished for the myriad of marine mammals , birds , flora and fauna and are proven prime locations of interest to both local residents and thousands of annual visitors who travel here from many global spheres.

Is it acceptable that these important areas of scientific and vital tourism based interest have been ignored ?

### **Time frame of licence**

The documents are not clear - is this a 3 or 10 year licence application ?

### **Not sensible or necessary**

- 1 - Environmental risks and potential impacts both on land and at sea
- 2 - Admission by the company of a dead zone in a dSAC, designated for harbour porpoise
- 3 - Safety risks due to cavern construction and gas storage within an area containing fault lines and has not been explored by GSNI & HSENI , since recent seismic activity
- 4 - Unlicensed dredging within a SAC
- 5 - There is no strategic proven need for gas storage in N.Ireland

Is it acceptable to risk harm to humans , food web and seas ?

Is it acceptable to risk harm for a project that has no strategic value ?

### **Missing environmental zone maps**

According to your own requirements , ordinance survey maps detailing and outlining all of the specific environmental areas were to have been included in the public consultation documents . These were not made available . Why not , surely the public and daera have a right to see and understand the areas likely to be impacted by the project ?

### **Bird survey incomplete**

The bird survey data presented is either extremely out of date or fails to be updated (2019) They are of extremely limited value in determining whether there are important bird foraging areas in the vicinity of the brine outfall. These surveys were not carried out at the appropriate time of year to obtain an accurate record of the usage of the site by foraging seabirds.

Do you intend to ensure a full bird survey is completed as was required ?

### **Inconsistent information**

Environmental Information which accompanies the application, does not reflect or assess what is proposed in the application documents.

### **Confusion re Three different construction methods for intake**

Is it acceptable that one clearly defined construction method has not been determined ?

### **Confusion re Cubic capacity of caverns**

The exact cc of the caverns is unclear due to conflicting information within the documents.

Is it acceptable to not know what volume of gas will be stored ?

### **Confusion re depth of caverns**

Throughout the documentation a variety of cavern depths are discussed. Having had completed the feed study why is this precise and vital information not determined ?

### **Confusion re phasing of leaching process**

The sequence in which caverns are to be leached is not clearly defined with the documents .

A variety of categories of the PC docs provide conflicting sequences to information provided within others .

Is it acceptable that essential information regarding elements of construction are not clearly defined or determined ?

### **Application is invalid**

For the reasons stated above the application is invalid and does not comply with the legal requirements of an environmental impact assessment;

### **Consultation process is flawed**

As there is insufficient accurate information to make informed and reasoned comments.

I look forward to receiving your response.

Yours faithfully

■■■ ■■■



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Letter of Objection to Gas Cavern Project  
**Date:** 27 March 2020 11:22:18

---

[REDACTED]

Ref : ML28\_12

Dear Sir /Madam

I have lived in Islandmagee with my family for all my life to date and wholeheartedly oppose this project in light of many considerations.  
Primarily our family are keen members of our sailing club and are very much concerned about the safety aspect of sailing over the areas where the caverns have been suggested to be mined.

Evidence of stakeholders consulted

I would be keen to review stakeholder consultations, especially those with local sailing, kayaking & diving clubs.

Please can you advise where I might find this information?

Cavern construction team not available during public consultation

At the public meetings with Islandmagee Energy there has not been any of the cavern construction team in attendance to discuss concerns and questions.

Considering the numerous risks entailed surely a qualified consultant should have been available to clarify all aspects of this element of the project?

Location of caverns

According to the project application this is not yet fully determined and could be under the lough or the land. Is it acceptable to not know where these caverns will be?

Impact on food web within a SAC

With an acknowledged benthic dead zone as a result of brine dispersion into a designated SAC for harbour porpoises, is it lawful or responsible to deliberately risk interference with food web?

Gobbins or Portmuck ASSI not taken into account

Both of these specifically designated areas are cherished for the myriad of marine mammals, birds, flora and fauna and are proven prime locations of interest to both local residents and thousands of annual visitors who travel here from many global spheres.

Is it acceptable that these important areas of scientific and vital tourism-based interest have been ignored?

Time frame of license

The documents are not clear - is this a 3- or 10-year license application?

Not sensible or necessary

- 1 - Environmental risks and potential impacts both on land and at sea
- 2 - Admission by the company of a dead zone in a DSAC, designated for harbour porpoises
- 3 - Safety risks due to cavern construction and gas storage within an area containing fault lines and has not been explored by GSNI & HSENI, since recent seismic activity
- 4 - Unlicensed dredging within a SAC
- 5 - There is no strategic proven need for gas storage in N.Ireland

Is it acceptable to risk harm to humans, food web and seas?

Is it acceptable to risk harm for a project that has no strategic value?

#### Missing environmental zone maps

According to your own requirements, ordinance survey maps detailing and outlining all of the specific environmental areas were to have been included in the public consultation documents. These were not made available. Why not, surely the public and DAERA have a right to see and understand the areas likely to be impacted by the project?

#### Bird survey incomplete

The bird survey data presented is either extremely out of date or fails to be updated (2019) They are of extremely limited value in determining whether there are important bird foraging areas in the vicinity of the brine outfall. These surveys were not carried out at the appropriate time of year to obtain an accurate record of the usage of the site by foraging seabirds.

Do you intend to ensure a full bird survey is completed as was required?

#### Inconsistent information

Environmental Information which accompanies the application, does not reflect or assess what is proposed in the application documents.

#### Confusion re Three different construction methods for intake

Is it acceptable that one clearly defined construction method has not been determined?

#### Confusion re Cubic capacity of caverns

The exact cc of the caverns is unclear due to conflicting information within the documents.

Is it acceptable to not know what volume of gas will be stored?

#### Confusion re depth of caverns

Throughout the documentation a variety of cavern depths are discussed. Having had completed the feed study why is this precise and vital information not determined?

#### Confusion re phasing of leaching process

The sequence in which caverns are to be leached is not clearly defined with the documents.

A variety of categories of the PC docs provide conflicting sequences to information provided within others.

Is it acceptable that essential information regarding elements of construction are not clearly defined or determined?

#### Application is invalid

For the reasons stated above the application is invalid and does not comply with the legal requirements of an environmental impact assessment;

#### Consultation process is flawed

As there is insufficient accurate information to make informed and reasoned comments.

I look forward to receiving your response.

Yours faithfully

██████████

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Energy Marine Licence Consultation ML 28\_12  
**Date:** 27 March 2020 11:43:25

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Dear Sir/ Madam

Further to my previous email copied below I wish to make further objection as follows:-

Fishing is an important part of our local economy and is a legitimate use of the sea;

The Environmental Information presented confirms that there will be adverse impacts on a broad range of species;

Table 7-2126 of the Environmental Update Report shows “minor (adverse)” impacts from brine discharge on a broad range of species including fish, plankton, shellfish and benthic subtidal habitat with no mitigation proposed for any of these. While these impacts are considered to be minor, the fact remains that this application will have adverse impacts on a huge range of species within two designated sites.

The applicant has not included Portmuck ASSI or The Gobbins ASSI into their assessment on impacts to designated sites. Both of these sites list breeding seabirds within their qualifying features and include razorbill, guillemot and kittiwake among others. Both sites are functionally linked to the proposed discharge area. The omission of any assessment of the potential impacts on the Gobbins ASSI is particularly striking given the importance of the Gobbins cliff top path. A key feature of the cliff top path is the opportunity to see rare seabirds and other sea life. Tourism is an important and legitimate use of our sea and makes an important contribution to our local economy.

Construction of the seawater intake and brine outfall pipe has the potential to cause a temporary threshold shift (TTS) and permanent threshold shift (PTS) to harbour porpoise, TTS to grey seals and TTS to fish whereby hearing involves a swim bladder or other gas volumes (this may cause behavioural effects at individual or population level);

The bird survey data presented is woefully inadequate. It is either extremely out of date or fails to the updated (2019) bird surveys provided by the applicant and believes that they are of extremely limited value in determining whether there are important bird foraging areas in the vicinity of the brine outfall. These surveys were not carried out at the appropriate time of year to obtain an accurate record of the usage of the site by foraging seabirds.

Additionally, previous surveys carried out for the site are now notably out of date and cannot be considered as a basis for determining whether the proposed discharge site is of importance to foraging seabirds;

The link between vital ecosystem components such as fish and foraging birds has been omitted;

The impact of underwater noise and vibration from the formation of the caverns under Larne Lough has not been assessed; and

The brine dispersion model has not accounted for storm surges.

For the above reasons the application documents do not meet the requirements of the EIA Directive or the Habitats Directive. The application should either be refused or the applicant should be asked to submit further

environmental information and a fresh application.

Thank you for your attention

Yours faithfully

A large black rectangular redaction box covering the signature area.

Dear Sir / Madam,

Ref: Islandmagee Energy Marine Licence Consultation ML 28\_12

With reference to the Marine Construction Licence application 2019  
Consultation ML 28\_12

by Islandmagee Energy / Infrastrata for the proposal to create 7 underground  
caverns by

solution mining below Larne Lough for the storage of natural gas, which  
includes the

associated marine infrastructure to enable seawater abstraction and the  
subsequent

discharge of brine from the creation of the caverns by solution mining, I  
have examined the

public consultation documents and I wish to object strongly to the project  
and the Marine

Construction Licence.

Firstly, no evidence of need for the proposal has been released for public  
consultation, and I

believe the project to be unnecessary with huge environmental impacts, both  
in the scale and

associated risks of the underground caverns, the environmental impact on  
land and at sea,

with the admission by the Company of the dead zone in a dSAC, designated  
for Harbour

Porpoise.

As a member of the public with serious concerns, I believe there should be a  
public inquiry,

as Under Regulation 17 of the Water Abstraction and Impoundment  
(Licensing) Regulations

(Northern Ireland) 2006, the Department has the power to order a public  
inquiry for the

purpose of evaluating representations made as a result of a public  
consultation exercise.

In the meantime I wish to object strongly to the issuing of a Marine  
Construction Licence as

per the Public Consultation for the following reasons:

1) the project is totally contrary to UK energy policy regarding the use of  
fossil fuel technology. we need to be reduce existing fossil fuel power  
generation not facilitate their longevity.

2) There are myriad ecological reasons why this area with all the applicable  
designations SPA, SAC, SSSI needs to be protected. The project owners  
have neither the knowledge nor the resources to ensure a sufficient degree of

protection either in construction or operation.

3) My family have lived in the area for well over 120 years and have seen the decline in the rural economy during that time since the advent of Ballylumford A. The only solution is a buoyant tourist economy based on the natural beauty and peaceful environment. This project benefits no one but the shareholders of the company who have no concern for either the local community nor the local environment.

I very much hope you will respect this objection.

Yours faithfully

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas Storage Project  
**Date:** 27 March 2020 12:02:18  
**Attachments:** [image001.png](#)  
[image003.png](#)

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Dear Madam

I make this further objection on behalf of No Gas Caverns Limited.

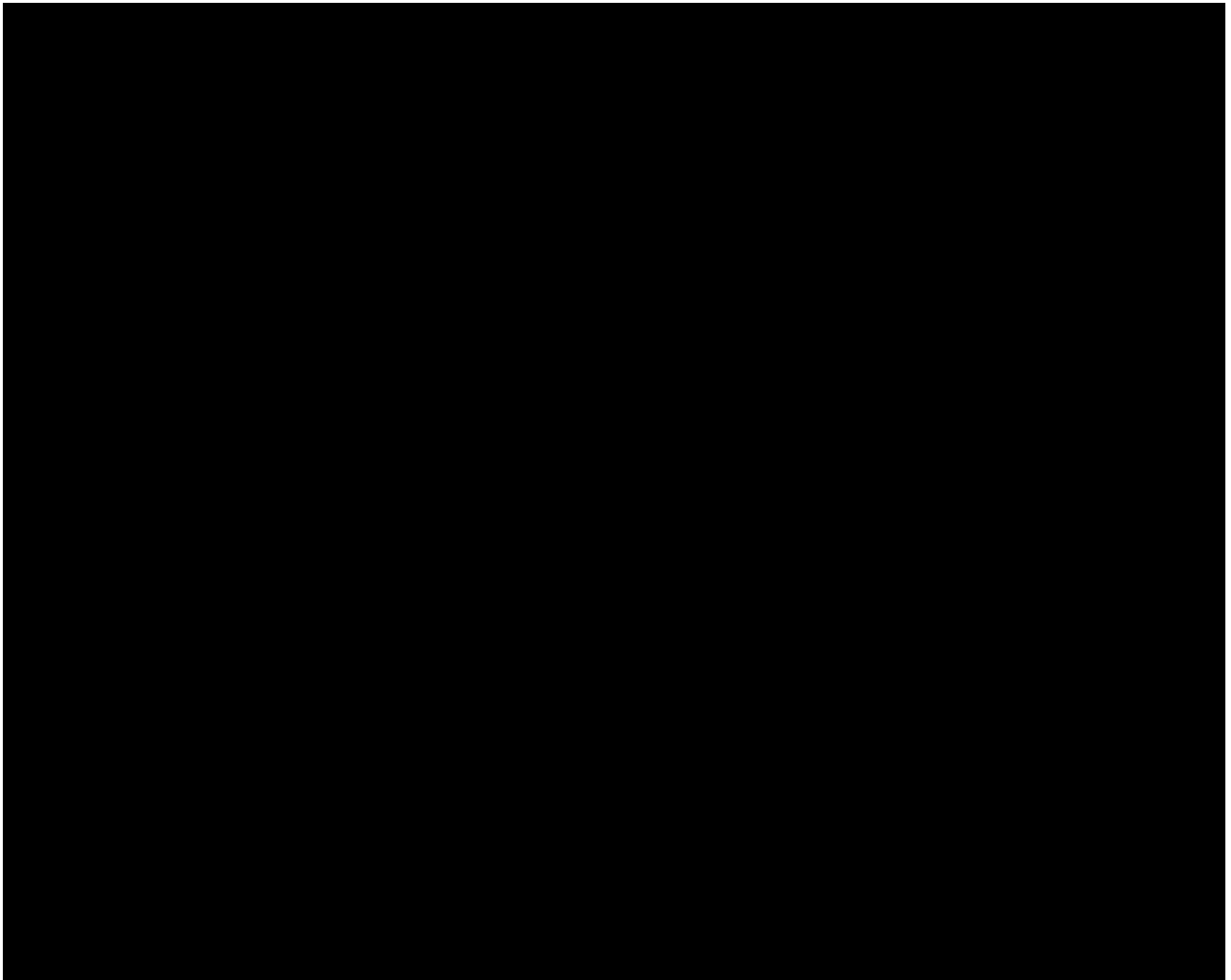
I note from the environmental statement and other environmental information submitted as part of the application that the proposal involves dredging. However, the application does not include an application for dredging works. Please can you clarify whether it is intended to request a further licence application to allow dredging works?

It is also requested that the consultation period be extended. A significant number of our members wish to make individual representations but are unable to do so because they fall within vulnerable groups which the UK Government has recommended self isolate in response to the Coronavirus Pandemic. Most of these individuals are elderly and do not have access to email. Furthermore, the applicant's latest consultation event was cancelled, many of our members had wished to attend, given that the previous event was advertised at very short notice. If the Department decides not to extend the consultation period to a week or two weeks after Government movement restrictions are lifted, it will disproportionality discriminate against the elderly, disabled and other vulnerable groups. Such a short extension would not in any way disadvantage the applicant as it is assumed that the Marine Licensing Team will only be dealing with urgent matters at the present time.

I look forward to your confirmation that the consultation period will be extended.

Kind regards

[REDACTED]



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Letter of Objection  
**Date:** 27 March 2020 12:10:53

---

[REDACTED]

Ref : ML28\_12

Dear Sir /Madam

I have lived in Islandmagee with my family for all my life to date and wholeheartedly oppose this project in light of many considerations.  
Primarily our family are keen members of our sailing club and are very much concerned about the safety aspect of sailing over the areas where the caverns have been suggested to be mined.

Evidence of stakeholders consulted

I would be keen to review stakeholder consultations, especially those with local sailing, kayaking & diving clubs.

Please can you advise where I might find this information?

Cavern construction team not available during public consultation

At the public meetings with Islandmagee Energy there has not been any of the cavern construction team in attendance to discuss concerns and questions.

Considering the numerous risks entailed surely a qualified consultant should have been available to clarify all aspects of this element of the project?

Location of caverns

According to the project application this is not yet fully determined and could be under the lough or the land.

Is it acceptable to not know where these caverns will be?

Impact on food web within a SAC

With an acknowledged benthic dead zone as a result of brine dispersion into a designated SAC for harbour porpoises, is it lawful or responsible to deliberately risk interference with food web?

Gobbins or Portmuck ASSI not taken into account

Both of these specifically designated areas are cherished for the myriad of marine mammals, birds, flora and fauna and are proven prime locations of interest to both local residents and thousands of annual visitors who travel here from many global spheres.

Is it acceptable that these important areas of scientific and vital tourism-based interest have been ignored?

Time frame of license

The documents are not clear - is this a 3- or 10-year license application?

Not sensible or necessary

1 - Environmental risks and potential impacts both on land and at sea

- 2 - Admission by the company of a dead zone in a DSAC, designated for harbour porpoises
  - 3 - Safety risks due to cavern construction and gas storage within an area containing fault lines and has not been explored by GSNI & HSENI, since recent seismic activity
  - 4 - Unlicensed dredging within a SAC
  - 5 - There is no strategic proven need for gas storage in N.Ireland
- Is it acceptable to risk harm to humans, food web and seas?  
Is it acceptable to risk harm for a project that has no strategic value?

#### Missing environmental zone maps

According to your own requirements, ordinance survey maps detailing and outlining all of the specific environmental areas were to have been included in the public consultation documents. These were not made available. Why not, surely the public and DAERA have a right to see and understand the areas likely to be impacted by the project?

#### Bird survey incomplete

The bird survey data presented is either extremely out of date or fails to be updated (2019) They are of extremely limited value in determining whether there are important bird foraging areas in the vicinity of the brine outfall. These surveys were not carried out at the appropriate time of year to obtain an accurate record of the usage of the site by foraging seabirds.  
Do you intend to ensure a full bird survey is completed as was required?

#### Inconsistent information

Environmental Information which accompanies the application, does not reflect or assess what is proposed in the application documents.

#### Confusion re Three different construction methods for intake

Is it acceptable that one clearly defined construction method has not been determined?

#### Confusion re Cubic capacity of caverns

The exact cc of the caverns is unclear due to conflicting information within the documents.  
Is it acceptable to not know what volume of gas will be stored?

#### Confusion re depth of caverns

Throughout the documentation a variety of cavern depths are discussed. Having had completed the feed study why is this precise and vital information not determined?

#### Confusion re phasing of leaching process

The sequence in which caverns are to be leached is not clearly defined with the documents.  
A variety of categories of the PC docs provide conflicting sequences to information provided within others.

Is it acceptable that essential information regarding elements of construction are not clearly defined or determined?

#### Application is invalid

For the reasons stated above the application is invalid and does not comply with the legal requirements of an environmental impact assessment;

#### Consultation process is flawed

As there is insufficient accurate information to make informed and reasoned comments.

I look forward to receiving your response.



Yours faithfully



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Ref : ML28\_12 Objection  
**Date:** 27 March 2020 12:42:06

---

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Ref : ML28\_12

March 27th 2020

Dear Sir /Madam

As a member of Rostrevor Action Respecting our Environment (RARE) I am one of a number of people engaged in compiling a list of planning cases, particularly in areas with protected status such as SAC and ASSI, wherein outdated and/or inaccurate documents have been submitted in support of planning applications.

We have also a special interest in cases where public consultations have been either incomplete or non existent and where, through incompetence or as yet unidentified reasons, a pattern of vagueness at best and total confusion at worst has been in evidence.

We have grave concerns regarding all of the above in the case ML28\_12 and I am now writing to register my strongest objection.

**One. Lack of proper information at PC.**

Cavern construction team not available during PC

At the public meetings with Islandmagee Energy there has not been any of the cavern construction team in attendance to discuss concerns and questions.

Considering the numerous risks entailed, why was a qualified consultant not available to clarify all aspects of this element of the project ?

**Two. Vagueness/lack of transparency/ signs of incompetence.**

Location of caverns

According to the project application this is not yet fully determined and could be under the lough or the land.

Time frame of licence

The documents are not clear - is this a 3 or 10 year licence application ?

This vagueness is unacceptable.

### **Three. Lack of cautionary principle in protected areas.**

Impact on food web within an SAC

With an acknowledged benthic dead zone as a result of brine dispersion into a designated SAC for harbour porpoise , is it lawful or responsible to deliberately risk interference with food web ?

Gobbins or Portmuck ASSI not taken into account

Both of these specifically designated areas are cherished for the myriad of marine mammals , birds , flora and fauna and are proven prime locations of interest to both local residents and thousands of annual visitors who travel here from many global spheres.

Is it acceptable that these important areas of scientific and vital tourism based interest have been ignored ?

### **Four. Confusion and inconsistent information.**

Environmental Information which accompanies the application, does not reflect or assess what is proposed in the application documents.

Confusion re Three different construction methods for intake

Is it acceptable that one clearly defined construction method has not been determined ?

Confusion re Cubic capacity of caverns

The exact cc of the caverns is unclear due to conflicting information within the documents.

Is it acceptable to not know what volume of gas will be stored ?

Confusion re depth of caverns

Throughout the documentation a variety of cavern depths are discussed. Having had completed the feed study why is this precise and vital information not determined ?

Confusion re phasing of leaching process

The sequence in which caverns are to be leached is not clearly defined with the documents .

A variety of categories of the PC docs provide conflicting sequences to information provided within others .

Is it acceptable that essential information regarding elements of construction are not clearly defined or determined ?

Missing environmental zone maps

According to your own requirements , ordinance survey maps detailing and outlining all of the specific environmental areas were to have been included in the public consultation documents . These were not made available . Why not , surely the public and daera have a right to see and understand the areas likely to be impacted by the project ?

Bird survey incomplete

The bird survey data presented is either extremely out of date or fails to be updated (2019) They are of extremely limited value in determining whether there are important bird foraging areas in the vicinity of the brine outfall. These surveys were not carried out at the appropriate time of year to obtain an accurate record of the usage of the site by foraging seabirds.

Do you intend to ensure a full bird survey is completed as was required ?

Not sensible or necessary

- 1 - Environmental risks and potential impacts both on land and at sea
- 2 - Admission by the company of a dead zone in a dSAC, designated for harbour porpoise
- 3 - Safety risks due to cavern construction and gas storage within an area containing fault lines and has not been explored by GSNI & HSENI , since recent seismic activity
- 4 - Unlicensed dredging within a SAC
- 5 - There is no strategic proven need for gas storage in N.Ireland

Is it acceptable to risk harm to humans , food web and seas ?

Is it acceptable to risk harm for a project that has no strategic value ?

For the reasons stated above the application is invalid and does not comply with the legal requirements of an environmental impact assessment;

Consultation process is flawed as there is insufficient accurate information to make informed and reasoned comments.

For all of the above reasons I wish to register my objection to this application.

I respectfully request your acknowledgement of this email and I would be grateful for your response to any or all of the questions raised above

I look forward to receiving your response.

Thank you.

Yours faithfully



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Infrastrata Application for Marine Licence - Islandmagee  
**Date:** 27 March 2020 13:56:03

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Dear Sirs

I have already forwarded an objection to this proposal, and I'm not quite sure if further objection is required in the light of the extension of the Consultation Period.

In any event, I reiterate my original objection to the Marine Licence.

I am a former Chartered Civil Engineer, whose initial expertise was that of Harbour/Marine Engineering. I cannot see how the Marine discharge in the present case can be predicted with any degree of accuracy. The potential damage is enormous. I think that the scheme generally is misconceived and the threat to the wildlife and environment is very real.

Please note my (further) objection to the granting of the relevant Licence.

Yours faithfully

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Objection Islandmagee Energy project  
**Date:** 27 March 2020 14:55:58

---

Dear Sir/Madam

I have a significant number of concerns with regards to the Islandmagee Energy Project ML28\_12 and wish to convey my objections as detailed below :

1 - The public consultation documents appear to be heavily lacking in clarity. It is difficult to bring together the content of each separate submission in order to fully understand the project in its entirety. Surely a single submission document would present a clearer picture.

2 - There are inconsistencies and conflicting information found between the various documents thus making it difficult to ascertain what the precise plans are. Can this be clarified by the applicant.

3 - There should be a public inquiry, as under Regulation 17 of the water abstraction and Impoundment (licensing ) regulations (Northern Ireland ) 2006, the department has the power to order a public inquiry for the purpose of evaluating representations made as result of a public consultation exercise .

4 -The project is unnecessary in light of the huge environmental risks and potential impacts both on land and at sea , with the admission by the company of a dead zone in a dSAC, designated for harbour porpoise and would admonish that in my opinion , the precautionary principle should apply.

5 - The application does not include any Ordnance Survey maps detailing exact location of the caverns , as is required - but in fact the application states the exact location is as yet unknown as surely a proposed location is of vital importance.

6 - The licence period is unknown. What is the timescale and lifespan of the project?

7 - There are 3 different construction methods mentioned . Surely there should be only one construction method , which should be clearly defined ?

Do the design and construction team not have a definitive plan / method ?

8 - Neither Portmuck ASSI nor the Gobbins ASSI have been considered.

9 - Not all of the “in combination projects “ within the surrounding areas were taken into consideration - Mullaghboy Sewage works and the controversial Cloghan point which also lie within the SAC.

10 - The bird survey has not been fully updated

11 - The brine dispersion will impact upon the food web and although suggested it is unlikely to cause significant permanent displacement of harbour porpoise - the findings are wholly speculative and non conclusive .

12 - The impact of underwater noise from vibrations generated from the solution mining process has not been assessed. Why not ?

13 - The applicant does not appear to know the exact cubic capacity of the caverns - what is the correct capacity?

14 - HR Wallingford gave clear direction that the number of ports should be increased or that the size of the ports decreased.

Why then were the number of ports decreased ?

15 - There seems to be no clear programme for the decommissioning of the caverns.

What is the precise plan for this ?

Who will take full responsibility for the lifetime maintenance of them once Islandmagee Energy no longer receive commercial benefit from the project ?

For the above reasons the application documents do not meet the requirements of the EIA Directive or the Habitats Directive. The application should either be refused or the applicant should be asked to submit further environmental information and a fresh application.

Thanking you for your attention and I look forward to receiving your response.

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Objection Islandmagee Energy Project ML 28-12  
**Date:** 27 March 2020 15:07:45

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> Dear Sir/Madam

> I have a significant number of concerns with regards to the Islandmagee Energy Project ML28\_12 and wish to convey my objections as detailed below :

> 1 - The public consultation documents appear to be heavily lacking in clarity. It is difficult to bring together the content of each separate

> submission in order to fully understand the project in its entirety. Surely a single submission document would present a clearer picture.

> 2 - There are inconsistencies and conflicting information found between the various documents thus making it difficult to ascertain what the precise plans are. Can this be clarified by the applicant.

> 3 - There should be a public inquiry, as under Regulation 17 of the water abstraction and Impoundment (licensing ) regulations (Northern Ireland ) 2006, the department has the power to order a public inquiry for the purpose of evaluating representations made as result of a public consultation exercise .

> 4 -The project is unnecessary in light of the huge environmental risks and potential impacts both on land and at sea , with the admission by the company of a dead zone in a dSAC, designated for harbour porpoise and would admonish that in my opinion , the precautionary principle should apply.

> 5 - The application does not include any Ordnance Survey maps detailing exact location of the caverns , as is required - but in fact the application states the exact location is as yet unknown as surely a proposed location is of vital importance.

> 6 - The licence period is unknown. What is the timescale and lifespan of the project?

> 7 - There are 3 different construction methods mentioned . Surely there should be only one construction method , which should be clearly defined ?

> Do the design and construction team not have a definitive plan / method ?

> 8 - Neither Portmuck ASSI nor the Gobbins ASSI have been considered.

> 9 - Not all of the “in combination projects “ within the surrounding areas were taken into consideration - Mullaghboy Sewage works and the controversial Cloghan point which also lie within the SAC.

> 10 - The bird survey has not been fully updated

> 11 - The brine dispersion will impact upon the food web and although suggested it is unlikely to cause significant permanent displacement of harbour porpoise - the findings are wholly speculative and non conclusive .

> 12 - The impact of underwater noise from vibrations generated from the solution mining process has not been assessed. Why not ?

> 13 - The applicant does not appear to know the exact cubic capacity of the caverns - what is the correct capacity?

> 14 - HR Wallingford gave clear direction that the number of ports should be increased or that the size of the ports decreased.

> Why then were the number of ports decreased ?

> 15 - There seems to be no clear programme for the decommissioning of the caverns.

> What is the precise plan for this ?

> Who will take full responsibility for the lifetime maintenance of them once Islandmagee Energy no longer receive commercial benefit from the project ?

> For the above reasons the application documents do not meet the requirements of the EIA Directive or the Habitats Directive. The application should either be refused or the applicant should be asked to submit further environmental information and a fresh application.

> Thanking you for your attention and I look forward to receiving your response.

> [REDACTED]  
>  
>  
>  
>  
>



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Letter of objection  
**Date:** 27 March 2020 15:55:43

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[REDACTED]  
[REDACTED]  
[REDACTED]

Marine licensing team  
Ref : ML28\_12

Dear Sir /Madam

I have lived in Islandmagee for most of my life (27 years) and now enable my young family to appreciate the many ecological benefits and beauty this area has to offer .

I am appalled that this project was even considered by planning , and hope that considering the huge push for environmental responsibility and the many changes in legislation since the initial planning application , this may no longer be deemed sensible or necessary .

I have some objections and wholeheartedly oppose this project. Please find listed below my concerns.

#### Risk to harbour porpoise

The area is well documented by cedar and ulster wildlife as habitat , feeding and breeding area of harbour porpoise and has been designated as an SAC.

The proposed brine dispersion will pump 1000 cm per hour for 5 - 7 years of brine 8 times the normal salinity , creating subsequent benthic loss. within this designated SAC.

It is a known fact that any interference with food web can create a causal effect .

Is the risk of creating a causal effect , with regard to the harbour porpoise even permitted within an SAC ?

#### Risk to breeding colonies of Rosate Tern

Larne lough is well documented as the only breeding site in NI for Rosate Tern and a huge financial investment of £400,000 was used to create seawater defences to facilitate the protection of the nesting sites .

I have had the privilege of watching the tern, with beaks full of sand eel , fly over my parents home on the east side of the peninsula , not far from the proposed brine dispersion area, to their breeding site on the west , within the lough.

With the unknown volume of benthic loss due to the toxic brine dispersion and seawater abstraction process , how positively assured can we be that this interference upon the food web will not negatively impact the tern and enable their continuing breeding success. ?

#### Risk to quality of water

The very popular beaches at Browns bay and Portmuck are within just a few hundred metres of the brine dispersion area. These beaches are where our children and many adults too, spend their summer days , swimming and pier jumping into.

I would like to fully understand what the brine being pumped at high velocity into the sea creating turbulence , will do to the appearance and quality of the sea water ?

Also , what will the brine creep of several kilometres ( as per HR Wallingford report) do to

(a) the visual appearance of the water and (b) what effect will a highly saturated brine content of the sea have upon those swimming within it ?

Thank you for considering my concerns and I look forward to receiving your responses in due course .

Yours faithfully ,



Sent from my Samsung Galaxy smartphone.

**From:** [REDACTED]  
**Subject:** [DAERA Marine Licensing Team](#)  
**Date:** Islandmagee Energy Project ML28-12  
27 March 2020 16:03:14

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Dear Marine Licensing team

I am writing about the Islandmagee Energy Project ML28\_12 public consultation documents. As a frequent visitor to Islandmagee I have many questions and concerns. Viz


1. The project will have a detrimental environmental and economic impact.
2. The area for the proposed project is key for local wildlife and is increasingly a tourist attraction. It is unclear from the documents published how close the site will be to designated environmental sites. A plan does not appear to be included in the application despite being referred to.
3. Can Daera confirm that this application only covers the works that are required for the design phase? Will the next phase of the project will be the subject of a further application and environmental impact statement? There is a clear lack of detail in the application.
4. The applicant states the works will take 10 years, yet the licence is normally only granted for no more than 3 years. Which is this application for?
5. I cannot see any specific detail of location plans showing the location of the caverns. The plan attached the application document is too basic for proper appraisal.
6. Detail regarding the depth of the caverns is inconsistent in the application. The documents refer to a range of depths from 1350- 1500m, yet the application refers to 1700m.
7. There is insufficient information the design and functioning of the pumps. Is this information available?
8. The non-technical summary on the website is 10 years old and requires updating.
9. I note the objections raised by the key Environmental groups in Northern Ireland under the umbrella of the NI Marine task force and see compelling evidence to turn down this application in their submissions.

In summary, there are many inconsistencies and omissions in the material published. The applicant should withdraw the application and resubmit addressing these issues including a single environmental statement with a non-technical summary.

Yours sincerely

[REDACTED]

Sent from my iPad

**From:**   
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Further Questions and points Islandmagee Gas Storage application ML 28\_12  
**Date:** 27 March 2020 16:07:02

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I have to say that I was most disturbed to see this shoddy cowboy builders type outfit\*\* get an additional period of time for additions to the consultation (\*\*Infrastrata/Islandmagee Energy in case you aren;t aware of who I am talking about)

Its the last day and I probably should have written earlier But I have been ill with Corona Virus like symptoms! So my apologies if I tend to wander

Yesterday and this morning I was incensed by the hand wringing and derisory comments being made towards us the people who live on Islandmagee and any objectors to the project

These people have no sentiment of "Green" the only green they will be interested in are the notes flowing into their coffers, from Grant schemes and subsidies! As far as I recollect there is

They claim Local employment I call rubbish They will bring in overseas labour as the cheapest tender Just as they did with Ballylumford Gas Pressure reducing Station and Conversions at Kilroot and the Gas pipeline networks

I sincerely hope that you fo ks, who it would appear to all of us, been robbed of the opportunity to close this Scam off permanently by the decision having to be made by a "minister"

I would strongly hope that you folks at DAERA who know, what is what, are actually listened to! "BUT" as we are fairly sure Ministers love a bit of good media and they do NOT I ke to be left as responsible So how about you folks word into the document that the Minister who approves this project despite or recommendation to deny Marine licence be culpable on every count of Environmental damage

So I thought Their computer modelling ?? Based on What ??? A small trawler Bobbing around making no worthy attempt at following a grid pattern? What was their data etc etc etc

So I thought Lets just share Real world experience NOt a computer model that can be?

Shall we say "tweaked" to give data that is favourable and please I worked in IT, the slightest tweak of coding can make a marked change

So in that instance I have a video that I put online Its live recorded and is self evident

So If one teaspoon in 200 ml of cold water can do this What wold you expect from thousands of cubic litres travelling up from 1Km underground

Can you imagine real world NOT some computer model of how murky and uninhabitable that will make the waters in and around

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** RE: Islandmagee Gas Storage Marine License Application  
**Date:** 27 March 2020 16:30:05

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Reference: ML\_28\_12

To whom it may concern,

I am writing today in order to express my deepest concerns surrounding Infrastrata's proposed gas cavern project in Islandmagee. I have previously sent a letter of objection regarding this to yourselves and am slightly concerned by the letter sent in reply stating that I do not need to make further response during the newly extended consultation period.

Infrastrata have been permitted to submit new documents to yourselves following the period of initial consultation. I therefore feel it necessary to further express my concerns surrounding the gas cavern project, which have not changed, even in light of the new information provided by Infrastrata.

Can you please clarify to me the precise proposed location of everything pertaining to this application? As from the maps submitted by Infrastrata I can find no way to accurately pinpoint where any of this will be. The maps have no scale nor direction markers to allow me to know for sure if these proposed caverns will be under water or under land or how close or far apart from each other they will be. It is also impossible to tell how near the geological fault they could possibly be.

At 16:15 on the day of closing your consultation, the HR Wallingford Brine Dispersion Model Verification Report is still inaccessible via the Islandmagee Energy webpage, making its public availability suspect at best.

I have this and many other questions to put to Infrastrata but unfortunately, due to the current public health crisis, this in-person consultation had to be cancelled, and while these questions and my earlier question on accountability remaining unanswered I feel it would be unwise to allow this proposal to proceed.

I am aware that the current Covid-19 situation makes a public consultation unlikely in the near future, though I still feel it would be in the best interests of both Infrastrata and the residents of Islandmagee that another one should go ahead prior to any further industrial planning.

At your nearest convenience I would appreciate your thoughts on the questions raised above and previously.

Thank you for your time.

Kind regards,

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas Storage Project  
**Date:** 27 March 2020 16:49:03

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Further to my earlier email, I wish to add the following observations:

As far as I can see from the mass of information provided, a response from the then Dept of Enterprise, Trade and Investment dated 9/1/09 stated that there was a "definite need for the project". This was over 11 years ago and seems to be at odds with current thinking. Has a more up to date response been sought and if not, why not.

The undersea brine discharge pipework arrangements seem to be unclear, the aspiration would appear to be a fully buried pipe except where it nears the diffuser but this is not supported by detailed drawings.

The gas cavern locations are not accurately indicated other than being described as within the limits of horizontal drilling (1000m) with a given separation distance. I do not believe this meets with planning requirements.

[REDACTED]

[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Fwd:  
**Date:** 27 March 2020 17:29:24

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----- Forwarded message -----

**From:** [REDACTED] <[REDACTED]>  
**Date:** Thu, 26 Mar 2020, 10:51  
**Subject:** Fwd:  
**To:** <[REDACTED]>

Dear Sir/Madam

Re: Islandmagee Gas Storage Project – Consultation ML 28\_12

I wish to raise some concerns regarding the application for a Marine Licence for works at Islandmagee.

I must admit I have found the documents very difficult to follow and the content very confusing. Surely in the case of a project which has attracted such public attention the information could have been presented in a more user friendly manner. There are documents from 2010 and documents from 2019, there are contradictory statements, out of date information and only vague descriptions of designs and proposals. I feel this is totally inadequate.

The newspaper advertisement states the proposed caverns will be used for “the storage of approximately 500 million cubic metres of natural gas” also 500 million cubic metres is stated in the Environmental Impact Statement dated 2010, yet I see the shadow Habitats Assessment refers to a total capacity of 400 million cubic metres. Which is correct? The difference of 100 million cubic metres of capacity would dramatically change the amount of brine generated during the leaching process. So I would question the accuracy of the assessment of the environmental impact of the brine when the size of the caverns has not yet been established.

The design for both the brine outfall pipeline and the intake pipe as described in the Construction Method Statement (CMS) does not match that which is assessed in the Marine Environmental Conditions Update and subsequently considered within the shadow HRA. In respect of the brine outfall pipeline, the CMS states that “The HDD is expected to break the seabed surface at a distance of some 300-350m offshore with the remaining 100-150m of outfall laid on the seabed with rock mound protection”. The Marine Environmental Conditions Update and the original Environmental statement state that the HDD will break out at, or close to, the outfall point. The shadow HRA states that the pipe section will only be approximately 40m in length. Which is correct? Again I suggest the

environmental impacts of the application have not therefore been assessed.

The proposed project has the potential to have a huge detrimental effect on our coastline, our bird life, our wildlife and our marine life. Not to mention our property values our tourist industry our fishing jobs our leisure pursuits and our health and mental well-being but yet the documents presented lack attention to detail, lack current factual evidence and do not reflect acceptable consideration of the enormity of the judgement warranted by this application.

In my opinion the documents released are not yet at a stage where they should have been submitted for public consultation and because of this, I believe the entire marine licence application should be revisited.

Yours faithfully

[Redacted signature]

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**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** ML 28\_12  
**Date:** 27 March 2020 18:20:02

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To Whom It May Concern,

As someone who grew up in Islandmagee and still regularly spends time there with family who live in the area, I am writing to you to express my concerns about the Islandmagee Gas Storage Project (ML 28\_12).

While I have my concerns about the people behind this project and how they have conducted themselves, particularly in the media, I will express my concerns based on my primary field of expertise: acoustics. For context, I am currently working as a researcher at Sorbonne University in Paris on projects related to acoustics and acoustical modelling.

Appendix C – Underwater Noise presents almost 50 pages of graphs that, as far as I can see, are provided completely without context or explanation in any of the other documents. It appears as if they have been included simply to tick some box or to give the impression of rigor. Were a student to hand me a report with so many graphs presented without adequate explanation I would assume they were attempting to compensation for a lack of analysis with a surplus of useless data.

The graphs themselves raise several questions:

1. Under what conditions were these measurements made? What microphones or sensors were used? To what Standard do these measurement conform? Without this information there is no way to interpret them.
2. If these graphs present measurements made at some underwater site (my best guess) then why not include some modelling of the noise expected to be generated by the various processes required by the project? The current graphs may give some indication of the current background noise but it would be important to know how the additional noise compares to this. This is done for construction and traffic noise in the report, so why not underwater noise for the construction and operational phases?
3. Why was the A-weighted power spectrum used? A-weighting is used to approximate how sensitive humans are to different frequencies. As such, it has the effect of reducing the amount of low and high frequencies in the measurement. Is this part of the Standard used?

Overall, I find the lack of rigor in the presentation of data to be worrying. The lack of context given to this data makes it useless to anyone reading the report who does not have prior knowledge of how the data was obtained. This lack of rigor in the handling of data makes me question the overall quality of the report.

Best regards,

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Island Magee Gas Storage decision.  
**Date:** 30 March 2020 00:53:19

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<https://www.daera-ni.gov.uk/consultations/islandmagee-gas-storage-project-december-2019-consultation-ml-2812>

Dear DAERA

In relation to the Island Magee Gas Storage project, could you please inform me as to the time-frame for when you envisage a decision to be made on this project now that the consultation has closed.

Rgds [REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Infrastrata - Islandmagee  
**Date:** 01 April 2020 13:26:24

---

Hello

Hope you are all safe and well during these uncertain times.

Would it be possible to get an understanding of the timelines to award or rejection of the Marine Licence application now that the consultation period has now closed

Any info greatly appreciated

Regards

[REDACTED]

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[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** infrastrata application for a marine licence  
**Date:** 02 April 2020 12:43:22

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Good afternoon,

I hope all is well with you.

I am writing regarding the application for a marine licence by Infrastrata.

Are you able to provide a guideline as to when a decision will have been made?

Kind Regards,

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Fwd: Islandmagee Energy Marine Licence Consultation ML28\_12  
**Date:** 03 April 2020 18:51:48

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Sent from my iPhone

Begin forwarded message:

**From:** [REDACTED] <[REDACTED]>  
**Date:** 26 March 2020 at 15:13:01 GMT  
**To:** <[REDACTED]>  
**Subject:** FW: Islandmagee Energy Marine Licence Consultation ML28\_12

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**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 26 March 2020 15:10  
**To:** [REDACTED] <[REDACTED]>  
**Subject:** Islandmagee Energy Marine Licence Consultation ML28\_12

Dear Sir/Madam

I object to this damaging and unnecessary project. I have read through the public consultation documents and I feel that they are outdated and lacking in various areas.

The company admits it will create a dead zone in a dSAC, in an area specifically to protect harbour porpoise.

According to the companies reports, the noise levels will exceed those levels deemed safe for harbour porpoise.

The applicant has not include Portmuck ASSI or The Gobbins ASSI into their reports – why?? These areas are hugely important for the breeding and nesting of seabirds, including razorbill and guillemot.

The bird survey supplied could not possibly be accurate as it was taken at the wrong time of year to study foraging seabirds. Previous surveys carried out are also out of date and should not be considered.

The consultations documents fail to specify exactly where the caverns will be, could some of them be underground?. The marine licence legislation does not allow for an outline consent, were detailed design can be approved later on.

The applicant must include a detailed construction method statement with the application.

We must protect the inhabitants and species off Islandmagee, this project is too much of a threat to the delicate eco system. To this end we must support a healthy

sea, all the environmental organisations object to this outdated proposal.

Thankyou for considering my concerns.

Yours faithfully

A solid black rectangular redaction box covering the signature area.

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Fwd: Islandmagee Energy Marine Licence Consultation ML28\_12  
**Date:** 03 April 2020 20:50:29

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Sent from my iPhone

Begin forwarded message:

**From:** [REDACTED] <[REDACTED]>  
**Date:** 26 March 2020 at 15:13:01 GMT  
**To:** <[REDACTED]>  
**Subject:** FW: Islandmagee Energy Marine Licence Consultation ML28\_12

---

**From:** [REDACTED]mailto:[REDACTED]  
**Sent:** 26 March 2020 15:10  
**To:** [REDACTED]  
**Subject:** Islandmagee Energy Marine Licence Consultation ML28\_12

Dear Sir/Madam

I object to this damaging and unnecessary project. I have read through the public consultation documents and I feel that they are outdated and lacking in various areas.

The company admits it will create a dead zone in a dSAC, in an area specifically to protect harbour porpoise.

According to the companies reports, the noise levels will exceed those levels deemed safe for harbour porpoise.

The applicant has not include Portmuck ASSI or The Gobbins ASSI into their reports – why?? These areas are hugely important for the breeding and nesting of seabirds, including razorbill and guillemot.

The bird survey supplied could not possibly be accurate as it was taken at the wrong time of year to study foraging seabirds. Previous surveys carried out are also out of date and should not be considered.

The consultations documents fail to specify exactly where the caverns will be, could some of them be underground?. The marine licence legislation does not allow for an outline consent, were detailed design can be approved later on.

The applicant must include a detailed construction method statement with the application.

We must protect the inhabitants and species off Islandmagee, this project is too much of a threat to the delicate eco system. To this end we must support a healthy

sea, all the environmental organisations object to this outdated proposal.

Thankyou for considering my concerns.

Yours faithfully

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



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Fwd: Islandmagee Energy Marine Consultation ML28\_12  
**Date:** 03 April 2020 20:51:46

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Sent from my iPhone

Begin forwarded message:

**From:** [REDACTED] <[REDACTED]>  
**Date:** 26 March 2020 at 17:39:39 GMT  
**To:** <[REDACTED]>  
**Subject:** Islandmagee Energy Marine Consultation ML28\_12

Dear Sir/Madam

I wish to point out my queries on the public consultation documents in regard to this proposed project –

I believe there should be a public inquiry, as under Regulation 17 of the water abstraction and Impoundment (licensing ) regulations (Northern Ireland ) 2006, the department has the power to order a public inquiry for the purpose of evaluating representations made as result of a public consultation exercise .

I believe the project to be unnecessary nor sensible , in light of the huge environmental risks and potential impacts both on land and at sea , with the admission by the company of a dead zone in a dSAC, designated for harbour porpoise and would admonish that in my opinion , the precautionary principle should apply.

The applicant has not included Portmuck ASSI or The Gobbins ASSI into their assessment on impacts to designated sites. Both of these sites list breeding seabirds within their qualifying features and include razorbill, guillemot and kittiwake among others. Both sites are functionally linked to the proposed discharge area. The omission of any assessment of the potential impacts on the Gobbins ASSI is particularly striking given the importance of the Gobbins cliff top path. A key feature of the cliff top path is the opportunity to see rare seabirds and other sea life. Tourism is an important and legitimate use of our sea and makes an important contribution to our local economy. Construction of the seawater intake and brine outfall pipe has the potential to cause a temporary threshold shift (TTS) and permanent threshold shift (PTS) to harbour porpoise, TTS to grey seals and TTS to fish whereby hearing involves a swim bladder or other gas volumes (this may cause behavioural effects at individual or population level).

In relation to bird surveys. These surveys were not carried out at the appropriate time of year to obtain an accurate record of the usage of the site by foraging seabirds.

Additionally, previous surveys carried out for the site are now notably out of date and cannot be considered as a basis for determining whether the proposed discharge site is of importance to foraging seabirds;

The link between vital ecosystem components such as fish and foraging birds has been omitted.

Thank you for hearing my concerns..

Yours faithfully

A black rectangular redaction box covering the signature area.

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Fwd: Islandmagee Energy Marine Licence Consultation ML28\_12  
**Date:** 03 April 2020 20:52:33

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Sent from my iPhone

Begin forwarded message:

**From:** [REDACTED] <[REDACTED]>  
**Date:** 26 March 2020 at 17:11:14 GMT  
**To:** [REDACTED]  
**Subject:** Islandmagee Energy Marine Licence Consultation ML28\_12

Dear sir/madam

In relation to the gas caverns, I have many concerns regarding the public consultation documents supplied by Islandmagee Energy.

Harbour porpoise among other species will be effected. Construction of the seawater intake and brine outfall pipe has the potential to cause a temporary threshold shift (TTS) and permanent threshold shift (PTS) to harbour porpoise, TTS to grey seals and TTS to fish whereby hearing involves a swim bladder or other gas volumes (this may cause behavioural effects at individual or population level).

The bird survey data presented is woefully inadequate. It is either extremely out of date or fails to the updated (2019) bird surveys provided by the applicant and believes that they are of extremely limited value in determining whether there are important bird foraging areas in the vicinity of the brine outfall. These surveys were not carried out at the appropriate time of year to obtain an accurate record of the usage of the site by foraging seabirds. Additionally, previous surveys carried out for the site are now notably out of date and cannot be considered as a basis for determining whether the proposed discharge site is of importance to foraging seabirds; The link between vital ecosystem components such as fish and foraging birds has been omitted; The impact of underwater noise and vibration from the formation of the caverns under Larne Lough has not been assessed.

The brine dispersion model has not accounted for storm surges.

I believe there should be a public inquiry, as under Regulation 17 of the water abstraction and Impoundment (licensing ) regulations (Northern Ireland ) 2006, the department has the power to order a public inquiry for the purpose of evaluating representations made as result of a public consultation exercise .

I believe the project to be unnecessary nor sensible , in light of the huge

environmental risks and potential impacts both on land and at sea , with the admission by the company of a dead zone in a dSAC, designated for harbour porpoise and would admonish that in my opinion , the precautionary principle should apply.

Thankyou for acknowledging my concerns –

Regards

■■■■■ ■■■■

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Fwd: Islandmagee Energy Marine Licence Consulation ML28\_12  
**Date:** 04 April 2020 02:30:47

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Sent from my iPhone

Begin forwarded message:

**From:** [REDACTED] <[REDACTED]>  
**Date:** 26 March 2020 at 17:02:18 GMT  
**To:** [REDACTED]  
**Subject:** Islandmagee Energy Marine Licence Consulation ML28\_12

Dear Sir/Madam

As the owner of a local riding school I have various concerns regarding the project. One of my many concerns is regarding the noise/blasting that may occur – Construction of the seawater intake and brine outfall pipe has the potential to cause a temporary threshold shift (TTS) and permanent threshold shift (PTS) to harbour porpoise, TTS to grey seals and TTS to fish whereby hearing involves a swim bladder or other gas volumes (this may cause behavioural effects at individual or population level). The impact of underwater noise and vibration from the formation of the caverns under Larne Lough has not been assessed.

The applicant has not included Portmuck ASSI or The Gobbins ASSI into their assessment on impacts to designated sites. Both of these sites list breeding seabirds within their qualifying features and include razorbill, guillemot and kittiwake among others. Both sites are functionally linked to the proposed discharge area. The omission of any assessment of the potential impacts on the Gobbins ASSI is particularly striking given the importance of the Gobbins cliff top path. A key feature of the cliff top path is the opportunity to see rare seabirds and other sea life. Tourism is an important and legitimate use of our sea and makes an important contribution to our local economy.

Location of the caverns is not clear in the documents – at this stage they should be outlined clearly.

My concerns are for the animals, I don't feel that the bird surveys are accurate as they haven't been taken over a period of time that is required and they are also out of date.

My business relies on tourism and quiet country surroundings, both of which will be disrupted here, for an unnecessary end.

Thankyou for hearing my concerns

Best regards

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Fwd: Islandmagee Energy Marine Licence Consultation ML28\_12  
**Date:** 04 April 2020 10:53:05

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Sent from my iPhone

Begin forwarded message:

**From:** [REDACTED] <[REDACTED]>  
**Date:** 26 March 2020 at 16:49:42 GMT  
**To:** <[REDACTED]>  
**Subject:** Islandmagee Energy Marine Licence Consultation ML28\_12

Dear Sir/Madam

I wish to raise some points in regard to the project, which I believe to be totally unnecessary and damaging. On reading the public consultation documents supplied by Islandmagee Energy/Infrastrata I have the following concerns –

The location of the caverns are not outlined - The Marine Licence legislation does not allow for an “outline consent” process where detailed design can be approved later by subsequent consents. The applicant must therefore include a detailed Construction Method Statement with its application so that the Department and members of the public can clearly understand what is proposed, how it will be constructed and the Department can then carry out an Environmental Impact Assessment of those works and their construction.

Portmuck ASSI and Gobbins ASSI are not included in the assessment on impacts to designated sites. - Both of these sites list breeding seabirds within their qualifying features and include razorbill, guillemot and kittiwake among others. Both sites are functionally linked to the proposed discharge area.

The omission of any assessment of the potential impacts on the Gobbins ASSI is particularly striking given the importance of the Gobbins cliff top path. A key feature of the cliff top path is the opportunity to see rare seabirds and other sea life. Tourism is an important and legitimate use of our sea and makes an important contribution to our local economy.

The design for both the brine outfall pipeline and the intake pipe as described in the Construction Method Statement (CMS) does not match that which is assessed in the Marine Environmental Conditions Update and subsequently considered within the shadow HRA.

In respect of the brine outfall pipeline, the CMS states that “The HDD is

expected to break the seabed surface at a distance of some 300-350m offshore with the remaining 100-150m of outfall laid on the seabed with rock mound protection". The Marine Environmental Conditions Update and the original ES, it is consistently stated that the HDD will break out at, or close to, the outfall point. The shadow HRA states that the pipe section will only be approximately 40m in length. The environmental impacts of the application have not therefore been assessed.

I believe there should be a public inquiry, as under Regulation 17 of the water abstraction and Impoundment (licensing ) regulations (Northern Ireland ) 2006, the department has the power to order a public inquiry for the purpose of evaluating representations made as result of a public consultation exercise .

I look forward to hearing from you in regards to my concerns.

Your faithfully

A solid black rectangular redaction box covering the signature area.

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee energy marine licence application concerns and questions.  
**Date:** 16 April 2020 09:21:29

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Dear Sirs,

I am writing to let you know that during this difficult time of lockdown, I have spoken by phone to many Islandmagee neighbours who are elderly, who feel that they have not had the opportunity to have their questions about the marine licence addressed by you or Islandmagee energy, as the public consultation evening on 18 March was cancelled .

People have not had a full opportunity to raise concerns and be heard. The consultation process seems incomplete.

Could you please comment on this.

Yours sincerely

[REDACTED]

Sent from my iPad



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** RE: Islandmagee Gas storage ML28\_12  
**Date:** 16 April 2020 11:09:20  
**Attachments:** [image001.png](#)

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Good morning team,

I trust you are safe and well and appreciate you will be very busy at this time, I hope you are all good.

[REDACTED] ( CEO of Infrastrata ) has released an interview that took place with him and [REDACTED] [REDACTED] at London South East ( AIM ). As usual, [REDACTED] was attempting to attach some sort of synergies between H&W, the gas caverns and the boost to the economy....of which there are none!...and I can only assume he does this as an attempt to gain some sort of political sway in getting his ML granted, along with funding!. That aside, what did concern me was his rather, confident comment that he “ Will” get a decision on the ML in 4/6 weeks once Mr Poots has approved it!.... and he can see no reason why it would not get approved?? . I totally understand that he has made these throw away comments more than once and that nobody can control that however, does anyone take into account the concern and the impact that these statements ( Which are factually incorrect ) have on residents and the thousands of people that oppose this ridiculous “ Plan” of his?

This comment, along with his other ramblings does have an impact, It personally upset me last night and ruined my evening and is even impacting me today. I know this has had a similar impact on other concerned residents and again, causes upset and very unsettling times.

I totally understand the position of the Dept and the limitations in controlling this kind of behaviour however I would like this impact noted please along with the message that it sends out, pre determination.

Stay safe all and take care.

Thank you for your time.

Kindest Regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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**From:** DAERA Marine Licensing Team [mailto:[REDACTED]]

**Sent:** 25 March 2020 08:01

**To:** [REDACTED]\_12

Thank you for your response to the consultation.

Marine Licensing Team

**From:** [REDACTED] [mailto:[REDACTED]]

**Sent:** 18 March 2020 11:54

**To:** DAERA Marine Licensing Team <[REDACTED]>

**Subject:** HPRM: Islandmagee Gas storage ML28\_12

Good morning

Considering the current climate, I trust you are all safe and well.

In addition to my previous communications and objections, please see below some further points I am raising.

- Cavern location are unclear and / or not specified. A requirement of 12(1) of the Marine Works (EIA) Regulations. There are indications that the caverns will / maybe be constructed under land?
- Project description is unclear of vague.
- No detail, including plans of the licensable elements of the projects. Throughout the application and environmental information there are references to information being made available after a "detailed design phase", why has that not been complete as there will surely be "Unknowns" until that element is done, we cannot and it impossible to have a balanced view with no plans, currently it is all assumptions.
- Duration of licence validity. This is unclear and the application requests a licence for a 10 year period, yet the explanatory notes which accompany the application form state that licences will only be granted for a maximum of 3 years? Can we get clarity on that please along with the detail as to why we are seeing a huge variance.
- 
- Up to date non-technical summary. The Environmental Information which accompanies the application is spread over six separate documents. The non-technical summary relates only to an Environmental Statement produced in 2010. There is no updated,

single composite environmental statement with an updated non-technical summary.

This is a paper chase and is contrary to the legal requirements for EIA.

- Conflicting information in the environmental data ( Eg – Cavern Leaching schedule) The Environmental Information which accompanies the application, does not reflect or assess what is proposed in the application documents. One example being the phasing of the leaching of caverns is very different.
- Insufficient and conflicting information along with the consultation process being flawed as there is insufficient or lack of information to make informed and reasoned comments.
- The Marine Licence legislation does not allow for an “outline consent” process where detailed design can be approved later by subsequent consents. The applicant must therefore include a detailed Construction Method Statement with its application so that the Department and members of the public can clearly understand what is proposed, how it will be constructed and the Department can then carry out an Environmental Impact Assessment of those works and their construction.
- The application document dated Dec 2019 is conflicting and inconsistent with environmental information submitted in support of the application. The design for both the brine outfall pipeline and the intake pipe as described in the Construction Method Statement (CMS) does not match that which is assessed in the Marine Environmental Conditions Update and subsequently considered within the shadow HRA. In respect of the brine outfall pipeline, the CMS states that “The HDD is expected to break the seabed surface at a distance of some 300-350m offshore with the remaining 100-150m of outfall laid on the seabed with rock mound protection”. The Marine Environmental Conditions Update and the original ES, it is consistently stated that the HDD will break out at, or close to, the outfall point. The shadow HRA states that the pipe section will only be approximately 40m in length. The environmental impacts of the application have not therefore been assessed.
- For the intake pipe, three different construction methods are proposed within the CMS. Two of these methods are similar to what is assessed within the other documents but the third option represents a very different approach. It involves “a section of pipe running above ground and pinned to the rocks with a pipe length on the seabed secured with concrete saddles”, and has not been assessed for potential impacts in the documentation. This method would significantly increase the direct take footprint of the seabed and the differing construction methods have the potential to result in significantly different impacts to the marine environment than the others presented.

There are many more examples of inconsistencies between the application and environmental information. It is clear that the environmental information presented does not in fact assess the application proposal.

For these reasons, the Department should require that the Applicant submit further environmental information.
- Fishing is an important part of our local economy and is a legitimate use of the sea.
- The Environmental Information presented confirms that there will be adverse impacts on a broad range of species.

- Table 7-2126 of the Environmental Update Report shows “minor (adverse)” impacts from brine discharge on a broad range of species including fish, plankton, shellfish and benthic subtidal habitat with no mitigation proposed for any of these. While these impacts are considered to be minor, the fact remains that this application will have adverse impacts on a huge range of species within two designated sites.
- The applicant has not included Portmuck ASSI or The Gobbins ASSI into their assessment on impacts to designated sites. Both of these sites list breeding seabirds within their qualifying features and include razorbill, guillemot and kittiwake among others. Both sites are functionally linked to the proposed discharge area. The omission of any assessment of the potential impacts on the Gobbins ASSI is particularly striking given the importance of the Gobbins cliff top path. A key feature of the cliff top path is the opportunity to see rare seabirds and other sea life. Tourism is an important and legitimate use of our sea and makes an important and growing contribution to our local economy. There are also plans to ensure that connectivity is key in these areas to ensure we are aligned to digital growth, there is significant investment plans to deliver this along with plans to expand the Gobbins path, which will both increase tourism along with increases in revenue streams and opportunity into the Island and surrounding seas.
- Construction of the seawater intake and brine outfall pipe has the potential to cause a temporary threshold shift (TTS) and permanent threshold shift (PTS) to harbour porpoise, TTS to grey seals and TTS to fish whereby hearing involves a swim bladder or other gas volumes (this may cause behavioural effects at individual or population level).
- The bird survey data presented is woefully inadequate. It is either extremely out of date or fails to the updated (2019) bird surveys provided by the applicant and believes that they are of extremely limited value in determining whether there are important bird foraging areas in the vicinity of the brine outfall. These surveys were not carried out at the appropriate time of year to obtain an accurate record of the usage of the site by foraging seabirds.
- Additionally, previous surveys carried out for the site are now notably out of date and cannot be considered as a basis for determining whether the proposed discharge site is of importance to foraging seabirds.
- The link between vital ecosystem components such as fish and foraging birds has been omitted.
- The impact of underwater noise and vibration from the formation of the caverns under Larne Lough has not been assessed along with the very clear fact that this is “New” noise. There will be acoustics created that are alien to this region and seas and cannot assume just because “Boats and ferries” make noise that “Noise is Noise” and “Creatures will adapt or move away” We should not just focus on construction noise either, there is nothing to demonstrate what “New noise” will be created whilst this plant / structure outfall pipe etc is in operation over its lifespan and will that change over time due to environment changes or equipment changing /aging or being replaced?
- The brine dispersion model has not accounted for storm surges and they are VERY



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** RE: Islandmagee Gas storage ML28\_12  
**Date:** 16 April 2020 11:50:07  
**Attachments:** [image001.png](#)

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Thank you.

Go well.

Kindest Regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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**From:** DAERA Marine Licensing Team [mailto:[REDACTED]]  
**Sent:** 16 April 2020 11:44  
**To:** [REDACTED]  
**Subject:** RE: Islandmagee Gas storage ML28\_12

[REDACTED],

Thank you for your latest email. The department will not comment on speculation made in public by the company. There is no time frame for a decision to be made on the marine licence.

Regards,  
Marine Licencing Team

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**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 16 April 2020 11:09  
**To:** DAERA Marine Licensing Team <[REDACTED]>  
**Subject:** RE: Islandmagee Gas storage ML28\_12

Good morning team,

I trust you are safe and well and appreciate you will be very busy at this time, I hope you are all good.

[REDACTED] [REDACTED] has released an interview that took place with him and [REDACTED] [REDACTED] at London South East ( AIM ). As usual, [REDACTED] was attempting to attach some sort of synergies between H&W, the gas caverns and the boost to the economy...of which there are

none!...and I can only assume he does this as an attempt to gain some sort of political sway in getting his ML granted, along with funding!. That aside, what did concern me was his rather, confident comment that he “ Will” get a decision on the ML in 4/6 weeks once Mr Poots has approved it!.... and he can see no reason why it would not get approved?? . I totally understand that he has made these throw away comments more than once and that nobody can control that however, does anyone take into account the concern and the impact that these statements ( Which are factually incorrect ) have on residents and the thousands of people that oppose this ridiculous “ Plan” of his?

This comment, along with his other ramblings does have an impact, It personally upset me last night and ruined my evening and is even impacting me today. I know this has had a similar impact on other concerned residents and again, causes upset and very unsettling times.

I totally understand the position of the Dept and the limitations in controlling this kind of behaviour however I would like this impact noted please along with the message that it sends out, pre determination.

Stay safe all and take care.

Thank you for your time.

Kindest Regards

[Redacted signature block]

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**From:** DAERA Marine Licensing Team [<mailto:> [Redacted]]  
**Sent:** 25 March 2020 08:01  
**To:** [Redacted]  
**Subject:** Islandmagee Gas storage ML28\_12

Thank you for your response to the consultation.

Marine Licensing Team

**From:** [redacted] [mailto:[redacted]]  
**Sent:** 18 March 2020 11:54  
**To:** DAERA Marine Licensing Team <[redacted]>  
**Subject:** HPRM: Islandmagee Gas storage ML28\_12

Good morning

Considering the current climate, I trust you are all safe and well.

In addition to my previous communications and objections, please see below some further points I am raising.

- Cavern location are unclear and / or not specified. A requirement of 12(1) of the Marine Works (EIA) Regulations. There are indications that the caverns will / maybe be constructed under land?
- Project description is unclear of vague.
- No detail, including plans of the licensable elements of the projects. Throughout the application and environmental information there are references to information being made available after a “detailed design phase”, why has that not been complete as there will surely be “ Unknowns” until that element is done, we cannot and it impossible to have a balanced view with no plans, currently it is all assumptions.
- Duration of licence validity. This is unclear and the application requests a licence for a 10 year period, yet the explanatory notes which accompany the application form state that licences will only be granted for a maximum of 3 years? Can we get clarity on that please along with the detail as to why we are seeing a huge variance.
- 
- Up to date non-technical summary. The Environmental Information which accompanies the application is spread over six separate documents. The non-technical summary relates only to an Environmental Statement produced in 2010. There is no updated, single composite environmental statement with an updated non-technical summary. This is a paper chase and is contrary to the legal requirements for EIA.
- Conflicting information in the environmental data ( Eg – Cavern Leaching schedule) The Environmental Information which accompanies the application, does not reflect or assess what is proposed in the application documents. One example being the phasing of the leaching of caverns is very different.
- Insufficient and conflicting information along with the consultation process being flawed as there is insufficient or lack of information to make informed and reasoned comments.
- The Marine Licence legislation does not allow for an “outline consent” process where detailed design can be approved later by subsequent consents. The applicant must therefore include a detailed Construction Method Statement with its application so that the Department and members of the public



can clearly understand what is proposed, how it will be constructed and the Department can then carry out an Environmental Impact Assessment of those works and their construction.

- The application document dated Dec 2019 is conflicting and inconsistent with environmental information submitted in support of the application. The design for both the brine outfall pipeline and the intake pipe as described in the Construction Method Statement (CMS) does not match that which is assessed in the Marine Environmental Conditions Update and subsequently considered within the shadow HRA. In respect of the brine outfall pipeline, the CMS states that “The HDD is expected to break the seabed surface at a distance of some 300-350m offshore with the remaining 100-150m of outfall laid on the seabed with rock mound protection”. The Marine Environmental Conditions Update and the original ES, it is consistently stated that the HDD will break out at, or close to, the outfall point. The shadow HRA states that the pipe section will only be approximately 40m in length. The environmental impacts of the application have not therefore been assessed.
- For the intake pipe, three different construction methods are proposed within the CMS. Two of these methods are similar to what is assessed within the other documents but the third option represents a very different approach. It involves “a section of pipe running above ground and pinned to the rocks with a pipe length on the seabed secured with concrete saddles”, and has not been assessed for potential impacts in the documentation. This method would significantly increase the direct take footprint of the seabed and the differing construction methods have the potential to result in significantly different impacts to the marine environment than the others presented.

There are many more examples of inconsistencies between the application and environmental information. It is clear that the environmental information presented does not in fact assess the application proposal.

For these reasons, the Department should require that the Applicant submit further environmental information.

- Fishing is an important part of our local economy and is a legitimate use of the sea.
- The Environmental Information presented confirms that there will be adverse impacts on a broad range of species.
- Table 7-2126 of the Environmental Update Report shows “minor (adverse)” impacts from brine discharge on a broad range of species including fish, plankton, shellfish and benthic subtidal habitat with no mitigation proposed for any of these. While these impacts are considered to be minor, the fact remains that this application will have adverse impacts on a huge range of species within two designated sites.
- The applicant has not included Portmuck ASSI or The Gobbins ASSI into their assessment on impacts to designated sites. Both of these sites list breeding seabirds within their qualifying features and include razorbill, guillemot and kittiwake among others. Both sites are functionally linked to the proposed discharge area. The omission of any assessment of the potential impacts on the Gobbins ASSI is particularly striking given the importance of the Gobbins cliff top path. A key feature of the cliff top path is the opportunity to see rare seabirds and other sea life. Tourism is an important and legitimate use of our sea and

makes an important and growing contribution to our local economy. There are also plans to ensure that connectivity is key in these areas to ensure we are aligned to digital growth, there is significant investment plans to deliver this along with plans to expand the Gobbins path, which will both increase tourism along with increases in revenue streams and opportunity into the Island and surrounding seas.

- Construction of the seawater intake and brine outfall pipe has the potential to cause a temporary threshold shift (TTS) and permanent threshold shift (PTS) to harbour porpoise, TTS to grey seals and TTS to fish whereby hearing involves a swim bladder or other gas volumes (this may cause behavioural effects at individual or population level).
- The bird survey data presented is woefully inadequate. It is either extremely out of date or fails to the updated (2019) bird surveys provided by the applicant and believes that they are of extremely limited value in determining whether there are important bird foraging areas in the vicinity of the brine outfall. These surveys were not carried out at the appropriate time of year to obtain an accurate record of the usage of the site by foraging seabirds.
- Additionally, previous surveys carried out for the site are now notably out of date and cannot be considered as a basis for determining whether the proposed discharge site is of importance to foraging seabirds.
- The link between vital ecosystem components such as fish and foraging birds has been omitted.
- The impact of underwater noise and vibration from the formation of the caverns under Larne Lough has not been assessed along with the very clear fact that this is “New” noise. There will be acoustics created that are alien to this region and seas and cannot assume just because “Boats and ferries” make noise that “Noise is Noise” and “Creatures will adapt or move away” We should not just focus on construction noise either, there is nothing to demonstrate what “New noise” will be created whilst this plant / structure outfall pipe etc is in operation over its lifespan and will that change over time due to environment changes or equipment changing /aging or being replaced?
- The brine dispersion model has not accounted for storm surges and they are VERY common around these islands and are increasing.

In addition to my already detailed and robust challenges that I have previously communicated and the above reasons given today, the application documents do not meet the requirements of the EIA Directive or the Habitats Directive. The application should either be refused or the applicant should be asked to submit further environmental information and a fresh application.

Thank you again for your time on this matter.



[REDACTED]

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[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED] [Marine Licensing Team](#)  
**Subject:** RE: Islandmagee Gas Storage Project  
**Date:** 16 April 2020 16:59:03  
**Attachments:** [image001.png](#)

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[REDACTED]

Thank you for your email. I hope that you and your family are all safe and well.

I attach a link to an interview with the CEO of Islandmagee Energy recorded this week.  
<https://youtu.be/A3j-E1A3810>

You will note that at 11.24 in the video he is discussing the gas project “with a transition later in life into hydrogen”. Storage of hydrogen has not been assessed in the ES, and is a fundamental change to the project. This has not been assessed or considered in the Environmental Statement. This demonstrates that the present Environmental Statement amounts to project splitting.

You will recall that we have raised, on behalf of No Gas Caverns Limited a wide range of deficiencies in the Environmental Statement. In particular we raised the failure to assess the traffic and transport impacts of transporting construction materials to and from the site. We note that the CEO has now gone on record stating that parts of the build will be fabricated at Harland and Wolff shipyard and transported by sea to the site (1.52 in video) “as access roads into Islandmagee are smaller”. The transport of materials by sea and the unloading of these materials has not been assessed. The application documentation does not identify where these boats will dock and whether any upgrades are required to existing facilities or whether new facilities will be required.

As this information has only just come to light, and the consultation event scheduled to take place during March was cancelled, please add this to our objection. We expect that this issue will be addressed and resolved through the consultation process.

I would also be grateful if you could confirm what the staffing arrangements are for the Marine Licensing team during the present Covid 19 situation and the anticipated timescales for responding to objections and commencing the iterative process of resolving objections as set out within the Marine Licence Guidance document.

Kind regards

[REDACTED]

[REDACTED]

---

**Subject:** Islandmagee Gas Storage Project

Hello [REDACTED]

Thank you for your email of 27th March which makes two points on behalf of No Gas Caverns Ltd.

**1. Clarification as to whether it is intended to request a further licence application to allow dredging works**

This point will be addressed as part of the response to consultation.

**2. A request that the consultation period be extended for a short period in light of the COVID-19 emergency**

The consultation closed on 27<sup>th</sup> March and the Department is considering the responses received. We are however keeping the situation under review and I will contact you when the COVID-19 emergency situation passes to respond to your request.

Best wishes and stay safe.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

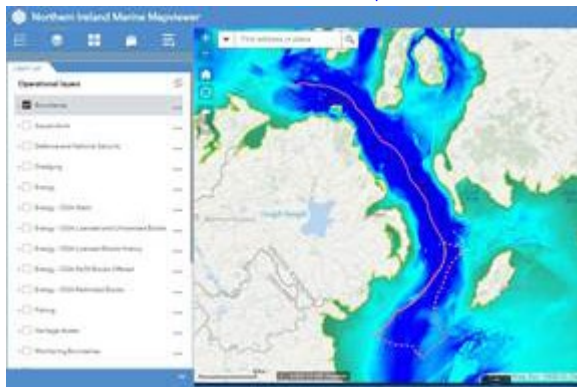
Email: [REDACTED]

Web: <https://www.daera-ni.gov.uk/topics/marine>

[REDACTED]

<http://thinkbeforeprinting.org/>

Check out DAERA's new [NI Marine Mapviewer!](#)



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: Islandmagee Gas Storage application ML 28\_12  
**Date:** 19 April 2020 16:32:45

---

As the expiry date for the public consultation has now passed, are you able to advise the number of responses received by yourselves? If you are able to give a breakdown of numbers supporting and numbers objecting to the application, that would be appreciated.

I look forward to hearing from you and, in the meantime, hope everyone in the Department is safe and well.

Regards,

[REDACTED]

---

**From:** DAERA Marine Licensing Team <[REDACTED]>  
**Sent:** 18 February 2020 15:30  
**Subject:** Additional information regarding Islandmagee Gas Storage application ML 28\_12

Dear Sir/Madam,

Following on from the email you received today advising you of the extended consultation period for the Islandmagee Gas Storage project, ML 28\_12, I wish to draw your attention to the following detail:

- The consultation will now expire on Friday 27 March 2020 at 17.00; and
- The addition of the HR Wallingford 3rd part audit of Brine Dispersion Model (consultation item 15 – see link below)

<https://www.daera-ni.gov.uk/consultations/islandmagee-gas-storage-project-december-2019-consultation-ml-2812>

For those of you who have emailed on behalf of other members of the public, please pass this information on.

**Kind Regards**

Marine Licensing Team

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas Storage Consultation  
**Date:** 22 April 2020 14:02:37

---

Marine Licensing Team,

My name is [REDACTED] from the Northern Ireland Marine Task Force. I am contacting you in relation to the Islandmagee Gas Storage Marine Licence consultation which NIMTF responded to in February. I would be grateful if you could clarify what the next stages and time-frames are for this application and how consultation responses will be answered?

I appreciate that in the middle of this difficult crisis an immediate answer may not be possible.

Kind regards,

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Date:** 27 April 2020 14:08:58

---

Dear DAERA, please accept this as my objection to the proposed gas cavern off  
Idlandmagee. [REDACTED]



**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Re: Islandmagee 60+ Group  
**Date:** 28 April 2020 22:28:24  
**Attachments:** [image001.png](#)

---

Many thanks for this.

On Tue, Apr 28, 2020 at 5:09 PM [REDACTED] wrote:

[REDACTED]

Thank you very much for your call earlier in relation to the Marine Licence Application for Islandmagee Gas Storage Project. I promised that I would get back to you on two specific issues, the location of the storage caverns and noise. I have attached a document showing you a figure of where the caverns will be located one mile underground and as you can see they are all beneath the Lough, not Islandmagee. You were also concerned about noise emanating from the drilling operation. I have extracted the Conclusions from the Noise Assessment which states there will be no measurable noise from the cavern construction and an 18 day period of some noise with the potential to have a slight negative impact on marine wildlife.

I fully appreciate that the documentation is highly technical and detailed and therefore difficult to grasp the big picture. Feel free to call me again if any specific issues or concerns spring to mind.

Yours aye

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Web: <https://www.daera-ni.gov.uk/topics/marine>

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** RE: Islandmagee Gas Storage Consultation  
**Date:** 01 May 2020 16:11:51

---

That's perfect, thank you for getting back to me.

Kind regards,  
[REDACTED]

----- On Wed, 22 Apr 2020 14:53:41 +0100 **DAERA Marine Licensing Team**  
<[REDACTED]> wrote -----

Dear [REDACTED]

There is no time frame for decision making on this proposal. A summary of responses would be published at a future date.

Marine Licensing Team

---

**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 22 April 2020 14:02  
**To:** DAERA Marine Licensing Team <[REDACTED]>  
**Subject:** Islandmagee Gas Storage Consultation

Marine Licensing Team,

My name is [REDACTED] from the Northern Ireland Marine Task Force. I am contacting you in relation to the Islandmagee Gas Storage Marine Licence consultation which NIMTF responded to in February. I would be grateful if you could clarify what the next stages and time-frames are for this application and how consultation responses will be answered?

I appreciate that in the middle of this difficult crisis an immediate answer may not be possible.

Kind regards,  
[REDACTED]



**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Questions  
**Date:** 04 May 2020 15:59:48

---

Dear team ,

I hope this finds you all in good health during this period of high risk and uncertainty .

Further to your recent response to me regarding only new and significant information will be considered and accepted up to the point of deliberation , I was wondering if you could please advise me :

1 - How can I or any of the public know what information is new , has or has not already been submitted to you ?

( There does not appear to be any record of objections / significant information already submitted to you on the Daera website )

2 - How can I or any of the public know what date the point of deliberation is ?

( There does not appear to be any specified date listed on the Daera website )

Would be very grateful to glean a better understanding of your directive .

Kind regards

[REDACTED]

Sent from my iPad

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: Islandmagee Gas Storage Project - ML 28\_12  
**Date:** 06 May 2020 17:13:18

---

[REDACTED]

Copied fyi

[REDACTED]

---

**From:** [REDACTED] [[mailto:\[REDACTED\]](mailto:[REDACTED])]  
**Sent:** 06 May 2020 3:13 PM  
**To:** [REDACTED] <[REDACTED]>  
**Subject:** Re: Islandmagee Gas Storage Project - ML 28\_12

Hi [REDACTED]

Thanks for getting back to me with the update, I appreciate it.

Yes thanks, I'm managing with the change - living in a quiet rural area has definitely helped. Hopefully your isolation won't be for too much longer, though I imagine we'll have to accept a new 'normal' for quite some time.

I appreciate it's not possible to give any timescale for this matter but when the public consultation is able to commence, will information sessions be held in the local community - similar to those for the marine licence? One other point I wasn't sure about was what all would we be consulted on - just the licences applications, or also the HRA when it is produced? I'm not aware of the process - does the HRA get done after the public consultation so that issues raised can be considered and addressed within it? If so, would there be any further opportunity for the public to comment on the HRA if they felt any issues were outstanding?

Sorry for the further questions, I appreciate you are under extra pressure due to Covid-19. I'll try and keep any others for the info sessions - if there are any! Thanks again for your help.

Regards,

[REDACTED]

---

**From:** [REDACTED] <[REDACTED]>  
**Sent:** 01 May 2020 14:44  
**To:** [REDACTED] <[REDACTED]>

**Cc:** [REDACTED] <[REDACTED]>  
**Subject:** RE: HPRM: Re: Islandmagee Gas Storage Project - ML 28\_12

Hi [REDACTED]

Sorry for the delay in replying to you.

I'm slowly getting used to being isolated, but not liking it. I hope you also are managing.

In answer to your questions I can say that we have received review applications for the proposed abstraction and discharge, and we are processing them, but as a result of Covid-19 that process has been slow. The virus has meant a delay to advertising and the consultation process. When advertising commences I can then forward you on application e-copies.

Regards and keep safe.

[REDACTED]

---

**From:** [REDACTED] [[mailto:\[REDACTED\]](mailto:[REDACTED])]  
**Sent:** 19 April 2020 4:17 PM  
**To:** [REDACTED]  
**Subject:** HPRM: Re: Islandmagee Gas Storage Project - ML 28\_12

Hi [REDACTED]

I hope you are keeping well in these strange times.

I appreciate your normal work schedule has likely changed considerably, but I was wondering if you were able to give me an update on Infrastrata's application in respect of the Abstraction and Consent to Discharge side of things. Have updated applications now been submitted? If so, (a) have you any idea when the public consultation might commence and (b) am I able to have sight of the new applications?

Thanks again for your help in this matter and I hope you and your colleagues stay safe.

Regards,

[REDACTED]

---

**From:** [redacted] <[redacted]>  
**Sent:** 06 March 2020 16:30  
**To:** [redacted] <[redacted]>  
**Cc:** [redacted] <[redacted]> [redacted]  
<[redacted]>  
**Subject:** Islandmagee Gas Storage Project - ML 28\_12

Hi [redacted]

Please find attached the licence documents / applications, you requested.

With respect of the current situation the Department will review these licenses, the determination/s will be made in the knowledge of current designations, and will be informed by the additional information submitted to DAERA, in support of the Marine Licence application. For consultation purposes the company will need to jointly advertise both review applications.

Regards [redacted]

---

**From:** [redacted] [[mailto:\[redacted\]](#)]  
**Sent:** 01 March 2020 2:23 PM  
**To:** [redacted] [redacted]  
**Subject:** Fw: Islandmagee Gas Storage Project - ML 28\_12

Hi [redacted]

In case the copy documents need to be sent my post, my address is:

[redacted]  
[redacted]  
[redacted]  
[redacted]  
[redacted]

Whilst writing, I can't quite remember if you said on the phone that the Abstraction Licence and Consent to Discharge applications were completely fresh applications. I recall you mentioned both will be subject to a further Public Consultation. Could you clarify the current position regarding the applications please?

Many thanks for your help.

Regards,

[redacted]

---

**From:** [REDACTED]

**Sent:** 24 February 2020 11:47

**To:** [REDACTED] <[REDACTED]>

**Subject:** Islandmagee Gas Storage Project - ML 28\_12

Hi [REDACTED]

Further to our telephone conversation, I would be grateful if you could forward copies of the original Abstraction Licence application, Consent to Discharge application and the Licences in respect of each application which were subsequently issued (albeit both in principle).

Thank you for your assistance in this matter.

Regards,

[REDACTED]



**From:** [REDACTED]  
**To:** [REDACTED] [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas Storage ML\_28\_12  
**Date:** 07 May 2020 13:49:21

---

Dear [REDACTED],

I hope you are all keeping well in these difficult times.

Further to my recent objection regarding information in a video with the CEO of InfraStrata / Islandmagee Energy [REDACTED], I have been informed that the team responded to a similar question raised by [REDACTED] with the following:

*“The application for the marine licence is considered as described in the public consultation earlier this year, any changes have not yet been proposed to the department. We are unable to comment on further speculation”*

When Islandmagee Energy / Infrastrata previously released information in RNS' (Regulated News Stories, regulated by the FCA) and on their website stating that 8 caverns were the objective of the project, this was not taken by DAERA as "speculation". Islandmagee Energy were required to clarify the precise number of caverns to ensure it accurately reflected information in the original draft marine construction license and planning application. The company then clarified in writing that the number of caverns was 7, as per the original application.

I would suggest this is also the case here. It doesn't show any consistency from the Department if the transportation of large building modules by sea and the project transitioning from storage of gas to hydrogen, as clearly stated as the intention by the CEO, is considered to be just "speculation", and the Department does not follow up to ask for clarity on whether these two new areas of concern are being considered.

This information was repeated again on 30th April, please find a link to the RNS here: <https://www.lse.co.uk/rns/INFA/interim-results-kbx1ly8gslhqdrf.html>

If these new areas of concern are the intention of the company, they must be considered and fully assessed for environmental impacts at this stage of the license application process. If they are not being considered, this should be confirmed in writing, in the same way clarification was required by DEARA on the number of caverns being considered by Islandmagee Energy.

I would be grateful if you would give this matter due consideration, and I look forward to hearing from you.

Kind regards,

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Marine Licence Public Consultation ML28\_12  
**Date:** 12 May 2020 19:33:20

---

I wrote a letter of objection on 24<sup>th</sup> January 2020 and by your letter of 19<sup>th</sup> February 2020 you advised me that a further document [HR Wallingford Brine Dispersion Study Review – FEED Stage] had been added to the public consultation documents. Your letter also stated that if I had already responded within the original consultation period then I did not need to make a further response, therefore I did nothing more.

I have now had a chance to look over the HR Wallingford document. It refers to a previous report by them done in 2013. That document is not with the public consultation documents on your website. Could you let me know where I can find it?

Thank you.

[REDACTED]

Sent from [Mail](#) for Windows 10

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: Questions  
**Date:** 14 May 2020 11:17:16

---

Good morning,

I was wondering if you could possibly point me in the right direction . A 2013 HR Wallingford doc should be in the consultation docs . However , it does not appear to be available within the public domain.

Please could you advise when /where this document maybe accessed .

Kind [REDACTED]  
[REDACTED]

Sent from my iPhone

> On 4 May 2020, at 18:49, DAERA Marine Licensing Team <[REDACTED]> wrote:

>

> Dear [REDACTED]

> All the information currently available regarding this application is in the public domain and the marine licence consultation is closed.

> At this time we would only accept a further response to the consultation if a member of the public or statutory consultee brings forward new or significant information not already under consideration or in the existing documentation. If you hold such information this should be submitted to DAERA promptly.

>

> As you know a range of issues and questions for consideration have been submitted during the public consultation period and a summary will be made available in the future.

>

> As previously explained to you and members of the campaign group there is no known timeframe for the consideration and decision making period, this position is unchanged. DAERA have two other consents to be consulted on and reviewed (water discharge and abstraction) and it is expected that the three decisions will be delivered at the same time by the department.

>

> Marine Licensing Team

>

>

> -----Original Message-----

> From: [REDACTED] [[mailto:\[REDACTED\]](mailto:[REDACTED])]

> Sent: 04 May 2020 15:57

> To: DAERA Marine Licensing Team <[REDACTED]>

> Subject: Questions

>

> Dear team ,

> I hope this finds you all in good health during this period of high risk and uncertainty .

>

> Further to your recent response to me regarding only new and significant information will be considered and accepted up to the point of deliberation , I was wondering if you could please advise me :

>

> 1 - How can I or any of the public know what information is new , has or has not already been submitted to you ?

> ( There does not appear to be any record of objections / significant information already submitted to you on the Daera website )

> 2 - How can I or any of the public know what date the point of deliberation is ?

> ( There does not appear to be any specified date listed on the Daera website )

>

> Would be very grateful to glean a better understanding of your directive .

> Kind regards

>

> [REDACTED]

>

>

>

>

>

> Sent from my iPad

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Islandmagee Gas Storage - ML 28\_12  
**Date:** 19 May 2020 08:30:23

---

FAO: [REDACTED]

[REDACTED]

I hope you are keeping well in these difficult times. I appreciate your working schedule may be somewhat different these days, but I'd appreciate it if you could clarify the current status of the Marine Licence application.

You may recall that at one of the information sessions I asked if the public would be given the opportunity to consider matters which may arise from responses received by DAERA to the Public Consultation. I have now seen that Infrastrata have stated that they expect to receive a request for further clarification. I attach the link to the full announcement in which they say:

*The Company expects to receive a request for clarifications from the Department of Agriculture, Environment and Rural Affairs ("DAERA") shortly, now that the public consultation process has closed. The Company is prepared to respond promptly to any clarification requests made by DAERA. Thereafter, the Company expects that a recommendation will be made by DAERA to Edwin Poots MLA, Minister of Agriculture, Environment, and Rural Affairs in relation to granting of the Marine Licence.*

*With the information currently available, the Company expects that this will meet its previously advised timeframe of committing to a Financial Investment Decision for the Project by the end of H1 2020. The Company understands that DAERA is still fully functioning at this time, whilst observing the Government's COVID-19 advice.*

Will those clarifications and Infrastrata's responses be made available to the public?

As you can see, Infrastrata continue to advise their shareholders of the timeframe for the Marine Licence. I appreciate it is not within your control to monitor such announcements, but I wanted to bring it to your attention as I had previously made the Department aware of similar claims by the company.

Thank you for your assistance and I look forward to hearing from you.

<https://polaris.brighterir.com/public/infrastrata/news/rns/story/wk84nvw/export>

Regards,



**From:** [REDACTED]  
**To:** [REDACTED]; [DAERA Marine Licensing Team](#)  
**Subject:** ref: Islandmagee Gas Storage ML\_28\_12  
**Date:** 19 May 2020 16:37:26

---

Dear [REDACTED]

ref: Islandmagee Gas Storage ML\_28\_12

I hope you are keeping well.

I have been made aware of the recent response from Marine Licensing to an enquiry regarding the 2013 HR Wallingford "Brine dispersion study review" that has still not been released by the Department for public consultation:

*"Thank you for your query. The older report you refer to has been superseded by the relevant documentation, which is still available on the website"*

Whilst the HR Wallingford "Brine dispersion study review - FEED stage" report from June 2019 certainly comes after the 2013 report, and was written in response to the FEED stage of the project, there appears to be no evidence of it "superseding" the 2013 report. In fact it makes several references to the 2013 report and is actually listed as item number 1 in the References section on page 5 of the 2019 report. I would suggest it follows that in order for a member of the public to be able to refer to the 2013 report, it would need to form part of the current documents available for review.

A comparison of the two documents also shows:

- The 2019 report does not contain a silt dispersion assessment, which is included in the 2013 report.
- The section "Hydrodynamic modelling and calibration" is reduced from 1 1/2 pages in the 2013 report to a single small paragraph in the 2019 report. On page 3 of the 2019 report it states *"Our previous review comments, which can be summarised as follows, still apply.."* with only two points indicated. For clarity and transparency the public and stakeholders would expect to be able to access the previous review comments, not rely on a very brief summary.

It is clear that the author of the 2019 report intended that the 2013 report be available for reference to enable the reader to be fully informed when reviewing the later report, which is why the 2013 report is included in the References section of the 2019 report. It does not mention anywhere in the 2019 report that it supersedes the 2013 report, as suggested by Marine Licensing. The 2013 report should therefore be released for public consultation to accompany the 2019 report.

Please consider the above as additional comment to add to my previous objection on the subject, and it would be appreciated if you would give the points raised due consideration.

I would be grateful if you would confirm receipt of my email, and I look forward to hearing from you.

Kind regards,

██████████



**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [DAERA Marine Licensing Team](#)  
**Subject:** Fwd: F/2010/0092/F ml 28\_12  
**Date:** 19 May 2020 18:47:00

---

Dear Sir/Madam

Please could you forward acknowledgement of receipt of this email.

Yours faithfully

[REDACTED]

Sent from my iPhone

Begin forwarded message:

**From:** [REDACTED] <[REDACTED]>  
**Date:** 8 February 2020 at 10:33:40 GMT  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** F/2010/0092/F ml 28\_12

Dear Planning ,

I have forwarded a letter of objection to marine licensing in which i have raised concerns regarding the location of caverns as outlined in planning application. Am not sure whether or not this has been drawn to your attention yet or not .

As per project description within daera consultation page :

" The well-heads and well pad will be located onshore although the boreholes will be directionally drilled out under Lame Lough to the positions where the caverns will be constructed."

The updated planning application 2019 states :

" Note: the cavern locations shown are estimates only and will only be confirmed at detailed design stage, some may even be located under the land rather than under the Lough "

The declaration within the updated planning application that the location is as yet unknown , would in my opinion suggest , that the original planning application was flawed.

Taking this substantial change to a significant element of the application into consideration , please could you advise your intent , with regard to the status of this planning application and whether a full and complete new application process will be required .

Yours faithfully

[REDACTED]

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Islandmagee Gas Storage Project - ML 28\_12  
**Date:** 20 May 2020 11:06:01

---

[REDACTED]

For consistency can I be copied into your HRA response?

I'll use the same wording.

Clearly re: the consent and the abstraction licence we will not be having public meetings.

Thanks [REDACTED]

---

**From:** [REDACTED]  
**Sent:** 07 May 2020 4:52 PM  
**To:** [REDACTED] <[REDACTED]> [REDACTED] e <[REDACTED]>  
[REDACTED] <[REDACTED]>  
**Subject:** RE: Islandmagee Gas Storage Project - ML 28\_12

Thanks, yes we have had similar queries regarding the HRA.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 06 May 2020 17:13  
**To:** [REDACTED] [REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
**Cc:** [REDACTED] [REDACTED]  
**Subject:** FW: Islandmagee Gas Storage Project - ML 28\_12

[REDACTED]

Copied fyi

[REDACTED]

---

[REDACTED] [REDACTED] [[mailto:\[REDACTED\]](mailto:[REDACTED])]  
**Sent:** 06 May 2020 3:13 PM  
**To:** [REDACTED] [REDACTED]  
**Subject:** Re: Islandmagee Gas Storage Project - ML 28\_12

Hi [REDACTED]

Thanks for getting back to me with the update, I appreciate it.

Yes thanks, I'm managing with the change - living in a quiet rural area has definitely

helped. Hopefully your isolation won't be for too much longer, though I imagine we'll have to accept a new 'normal' for quite some time.

I appreciate it's not possible to give any timescale for this matter but when the public consultation is able to commence, will information sessions be held in the local community - similar to those for the marine licence? One other point I wasn't sure about was what all would we be consulted on - just the licences applications, or also the HRA when it is produced? I'm not aware of the process - does the HRA get done after the public consultation so that issues raised can be considered and addressed within it? If so, would there be any further opportunity for the public to comment on the HRA if they felt any issues were outstanding?

Sorry for the further questions, I appreciate you are under extra pressure due to Covid-19. I'll try and keep any others for the info sessions - if there are any! Thanks again for your help.

Regards,

■

---

**From:** ■ <■>  
**Sent:** 01 May 2020 14:44  
**To:** ■ <■>  
**Cc:** ■  
**Subject:** RE: HPRM: Re: Islandmagee Gas Storage Project - ML 28\_12

Hi ■

Sorry for the delay in replying to you.

I'm slowly getting used to being isolated, but not liking it. I hope you also are managing.

In answer to your questions I can say that we have received review applications for the proposed abstraction and discharge, and we are processing them, but as a result of Covid-19 that process has been slow. The virus has meant a delay to advertising and the consultation process. When advertising commences I can then forward you on application e-copies.

Regards and keep safe.

■

---

■ ■ [\[mailto:■\]](mailto:■)  
**Sent:** 19 April 2020 4:17 PM

**To:** [REDACTED] <[REDACTED]>  
**Subject:** HPRM: Re: Islandmagee Gas Storage Project - ML 28\_12

Hi [REDACTED]

I hope you are keeping well in these strange times.

I appreciate your normal work schedule has likely changed considerably, but I was wondering if you were able to give me an update on Infrastrata's application in respect of the Abstraction and Consent to Discharge side of things. Have updated applications now been submitted? If so, (a) have you any idea when the public consultation might commence and (b) am I able to have sight of the new applications?

Thanks again for your help in this matter and I hope you and your colleagues stay safe.

Regards,

[REDACTED]

---

[REDACTED] <[REDACTED]>  
**Sent:** 06 March 2020 16:30  
**To:** [REDACTED] <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]> [REDACTED]  
<[REDACTED]>  
**Subject:** Islandmagee Gas Storage Project - ML 28\_12

Hi [REDACTED]

Please find attached the licence documents / applications, you requested.

With respect of the current situation the Department will review these licenses, the determination/s will be made in the knowledge of current designations, and will be informed by the additional information submitted to DAERA, in support of the Marine Licence application. For consultation purposes the company will need to jointly advertise both review applications.

Regards [REDACTED]

---

**From:** [REDACTED] [[mailto:\[REDACTED\]](mailto:[REDACTED])]  
**Sent:** 01 March 2020 2:23 PM

**To:** [REDACTED]  
**Subject:** Fw: Islandmagee Gas Storage Project - ML 28\_12

Hi [REDACTED]

In case the copy documents need to be sent my post, my address is:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Whilst writing, I can't quite remember if you said on the phone that the Abstraction Licence and Consent to Discharge applications were completely fresh applications. I recall you mentioned both will be subject to a further Public Consultation. Could you clarify the current position regarding the applications please?

Many thanks for your help.

Regards,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 24 February 2020 11:47  
**To:** [REDACTED] <[REDACTED]>  
**Subject:** Islandmagee Gas Storage Project - ML 28\_12

Hi [REDACTED]

Further to our telephone conversation, I would be grateful if you could forward copies of the original Abstraction Licence application, Consent to Discharge application and the Licences in respect of each application which were subsequently issued (albeit both in principle).

Thank you for your assistance in this matter.

Regards,

[REDACTED]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: Questions  
**Date:** 21 May 2020 09:28:26

---

Dear team ,

Thank you for your response . However am still rather confused . The new report gives reference to the preceeding one where more in depth clarification is found . This surely indicates it should be read in tandem rather than being superseded does It not ?

Kind regards

[REDACTED]

Sent from my iPhone

> On 14 May 2020, at 14:05, DAERA Marine Licensing Team <[REDACTED]> wrote:

>

> Dear [REDACTED]

> Thank you for your query. The older report you refer to has been superseded by the relevant documentation, which is still available on the website.

> <https://www.daera-ni.gov.uk/consultations/islandmagee-gas-storage-project-december-2019-consultation-ml-2812>

>

> Marine Licensing Team

>

> -----Original Message-----

> From: [REDACTED] [mailto:[REDACTED]]

> Sent: 14 May 2020 11:17

> To: DAERA Marine Licensing Team <[REDACTED]>

> Subject: Re: Questions

>

> Good morning,

> I was wondering if you could possibly point me in the right direction . A 2013 HR Wallingford doc should be in the consultation docs . However , it does not appear to be available within the public domain.

> Please could you advise when /where this document maybe accessed .

> Kind regards

> [REDACTED]

>

> Sent from my iPhone

>

>> On 4 May 2020, at 18:49, DAERA Marine Licensing Team <[REDACTED]> wrote:

>>

>> Dear [REDACTED]

>> All the information currently available regarding this application is in the public domain and the marine licence consultation is closed.

>> At this time we would only accept a further response to the consultation if a member of the public or statutory consultee brings forward new or significant information not already under consideration or in the existing documentation. If you hold such information this should be submitted to DAERA promptly.

>>

>> As you know a range of issues and questions for consideration have been submitted during the public consultation period and a summary will be made available in the future.

>>

>> As previously explained to you and members of the campaign group there is no known timeframe for the consideration and decision making period, this position is unchanged. DAERA have two other consents to be consulted on and reviewed (water discharge and abstraction) and it is expected that the three decisions will be delivered at the same time by the department.

>>

>> Marine Licensing Team

>>

>>

>> -----Original Message-----

>> From: [REDACTED] [\[mailto:\[REDACTED\]\]](mailto:[REDACTED])

>> Sent: 04 May 2020 15:57

>> To: DAERA Marine Licensing Team <[REDACTED]>

>> Subject: Questions

>>

>> Dear team ,

>> I hope this finds you all in good health during this period of high risk and uncertainty .

>>

>> Further to your recent response to me regarding only new and significant information will be considered and accepted up to the point of deliberation , I was wondering if you could please advise me :

>>

>> 1 - How can I or any of the public know what information is new , has or has not already been submitted to you ?

>> ( There does not appear to be any record of objections / significant information already submitted to you on the Daera website )

>> 2 - How can I or any of the public know what date the point of deliberation is ?

>> ( There does not appear to be any specified date listed on the Daera website )

>>

>> Would be very grateful to glean a better understanding of your directive .

>> Kind regards

>>

>> [REDACTED]

>>

>>

>>

>>

>>

>> Sent from my iPad

>

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** RE: Islandmagee Gas storage ML28\_12  
**Date:** 21 May 2020 15:53:43  
**Attachments:** [image001.png](#)

---

Good afternoon,

I trust you are all safe and well. We are now some time into this process, what stage is this at now please? Is there anything you can share in the way of a summary update?

Thanks in advance.

Kindest Regards

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** DAERA Marine Licensing Team [mailto:[REDACTED]]  
**Sent:** 16 April 2020 11:44  
**To:** [REDACTED]  
**Subject:** RE: Islandmagee Gas storage ML28\_12

[REDACTED],

Thank you for your latest email. The department will not comment on speculation made in public by the company. There is no time frame for a decision to be made on the marine licence.

Regards,  
Marine Licencing Team

---

**From:** [REDACTED] (Northern Ireland) [mailto:[REDACTED]]  
**Sent:** 16 April 2020 11:09  
**To:** DAERA Marine Licensing Team <[REDACTED]>  
**Subject:** RE: Islandmagee Gas storage ML28\_12

Good morning team,

I trust you are safe and well and appreciate you will be very busy at this time, I hope you are all good.



[REDACTED] CEO of Infrastrata ) has released an interview that took place with him and [REDACTED] [REDACTED] at London South East ( AIM ). As usual, [REDACTED] was attempting to attach some sort of synergies between H&W, the gas caverns and the boost to the economy...of which there are none!...and I can only assume he does this as an attempt to gain some sort of political sway in getting his ML granted, along with funding!. That aside, what did concern me was his rather, confident comment that he “ Will” get a decision on the ML in 4/6 weeks once Mr Poots has approved it!.... and he can see no reason why it would not get approved?? . I totally understand that he has made these throw away comments more than once and that nobody can control that however, does anyone take into account the concern and the impact that these statements ( Which are factually incorrect ) have on residents and the thousands of people that oppose this ridiculous “ Plan” of his?

This comment, along with his other ramblings does have an impact, It personally upset me last night and ruined my evening and is even impacting me today. I know this has had a similar impact on other concerned residents and again, causes upset and very unsettling times.

I totally understand the position of the Dept and the limitations in controlling this kind of behaviour however I would like this impact noted please along with the message that it sends out, pre determination.

Stay safe all and take care.

Thank you for your time.

Kindest Regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

[REDACTED] DAERA Marine Licensing Team [[mailto:\[REDACTED\]](mailto:[REDACTED])]

**Sent:** 25 March 2020 08:01

**To:** [REDACTED]

**Subject:** Islandmagee Gas storage ML28\_12

Thank you for your response to the consultation.

Marine Licensing Team

**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 18 March 2020 11:54  
**To:** DAERA Marine Licensing Team <[REDACTED]>  
**Subject:** HPRM: Islandmagee Gas storage ML28\_12

Good morning

Considering the current climate, I trust you are all safe and well.

In addition to my previous communications and objections, please see below some further points I am raising.

- Cavern location are unclear and / or not specified. A requirement of 12(1) of the Marine Works (EIA) Regulations. There are indications that the caverns will / maybe be constructed under land?
- Project description is unclear of vague.
- No detail, including plans of the licensable elements of the projects. Throughout the application and environmental information there are references to information being made available after a “detailed design phase”, why has that not been complete as there will surely be “Unknowns” until that element is done, we cannot and it impossible to have a balanced view with no plans, currently it is all assumptions.
- Duration of licence validity. This is unclear and the application requests a licence for a 10 year period, yet the explanatory notes which accompany the application form state that licences will only be granted for a maximum of 3 years? Can we get clarity on that please along with the detail as to why we are seeing a huge variance.
- 
- Up to date non-technical summary. The Environmental Information which accompanies the application is spread over six separate documents. The non-technical summary relates only to an Environmental Statement produced in 2010. There is no updated, single composite environmental statement with an updated non-technical summary. This is a paper chase and is contrary to the legal requirements for EIA.
- Conflicting information in the environmental data ( Eg – Cavern Leaching schedule) The Environmental Information which accompanies the application, does not reflect or assess what is proposed in the application documents. One example being the phasing of the leaching of caverns is very different.
- Insufficient and conflicting information along with the consultation process being flawed as there is insufficient or lack of information to make informed and reasoned comments.

- The Marine Licence legislation does not allow for an “outline consent” process where detailed design can be approved later by subsequent consents. The applicant must therefore include a detailed Construction Method Statement with its application so that the Department and members of the public can clearly understand what is proposed, how it will be constructed and the Department can then carry out an Environmental Impact Assessment of those works and their construction.
- The application document dated Dec 2019 is conflicting and inconsistent with environmental information submitted in support of the application. The design for both the brine outfall pipeline and the intake pipe as described in the Construction Method Statement (CMS) does not match that which is assessed in the Marine Environmental Conditions Update and subsequently considered within the shadow HRA. In respect of the brine outfall pipeline, the CMS states that “The HDD is expected to break the seabed surface at a distance of some 300-350m offshore with the remaining 100-150m of outfall laid on the seabed with rock mound protection”. The Marine Environmental Conditions Update and the original ES, it is consistently stated that the HDD will break out at, or close to, the outfall point. The shadow HRA states that the pipe section will only be approximately 40m in length. The environmental impacts of the application have not therefore been assessed.
- For the intake pipe, three different construction methods are proposed within the CMS. Two of these methods are similar to what is assessed within the other documents but the third option represents a very different approach. It involves “a section of pipe running above ground and pinned to the rocks with a pipe length on the seabed secured with concrete saddles”, and has not been assessed for potential impacts in the documentation. This method would significantly increase the direct take footprint of the seabed and the differing construction methods have the potential to result in significantly different impacts to the marine environment than the others presented.  
 There are many more examples of inconsistencies between the application and environmental information. It is clear that the environmental information presented does not in fact assess the application proposal.  
 For these reasons, the Department should require that the Applicant submit further environmental information.
- Fishing is an important part of our local economy and is a legitimate use of the sea.
- The Environmental Information presented confirms that there will be adverse impacts on a broad range of species.
- Table 7-2126 of the Environmental Update Report shows “minor (adverse)” impacts from brine discharge on a broad range of species including fish, plankton, shellfish and benthic subtidal habitat with no mitigation proposed for any of these. While these impacts are considered to be minor, the fact remains that this application will have adverse impacts on a huge range of species within two designated sites.
- The applicant has not included Portmuck ASSI or The Gobbins ASSI into their assessment on impacts to designated sites. Both of these sites list breeding seabirds within their qualifying features and include razorbill, guillemot and kittiwake among others. Both sites

are functionally linked to the proposed discharge area. The omission of any assessment of the potential impacts on the Gobbins ASSI is particularly striking given the importance of the Gobbins cliff top path. A key feature of the cliff top path is the opportunity to see rare seabirds and other sea life. Tourism is an important and legitimate use of our sea and makes an important and growing contribution to our local economy. There are also plans to ensure that connectivity is key in these areas to ensure we are aligned to digital growth, there is significant investment plans to deliver this along with plans to expand the Gobbins path, which will both increase tourism along with increases in revenue streams and opportunity into the Island and surrounding seas.

- Construction of the seawater intake and brine outfall pipe has the potential to cause a temporary threshold shift (TTS) and permanent threshold shift (PTS) to harbour porpoise, TTS to grey seals and TTS to fish whereby hearing involves a swim bladder or other gas volumes (this may cause behavioural effects at individual or population level).
- The bird survey data presented is woefully inadequate. It is either extremely out of date or fails to the updated (2019) bird surveys provided by the applicant and believes that they are of extremely limited value in determining whether there are important bird foraging areas in the vicinity of the brine outfall. These surveys were not carried out at the appropriate time of year to obtain an accurate record of the usage of the site by foraging seabirds.
- Additionally, previous surveys carried out for the site are now notably out of date and cannot be considered as a basis for determining whether the proposed discharge site is of importance to foraging seabirds.
- The link between vital ecosystem components such as fish and foraging birds has been omitted.
- The impact of underwater noise and vibration from the formation of the caverns under Larne Lough has not been assessed along with the very clear fact that this is “New” noise. There will be acoustics created that are alien to this region and seas and cannot assume just because “Boats and ferries” make noise that “Noise is Noise” and “Creatures will adapt or move away” We should not just focus on construction noise either, there is nothing to demonstrate what “New noise” will be created whilst this plant / structure outfall pipe etc is in operation over its lifespan and will that change over time due to environment changes or equipment changing /aging or being replaced?
- The brine dispersion model has not accounted for storm surges and they are VERY common around these islands and are increasing.

In addition to my already detailed and robust challenges that I have previously communicated and the above reasons given today, the application documents do not meet the requirements of the EIA Directive or the Habitats Directive. The application should either be refused or the applicant should be asked to submit further environmental information and a fresh application.

Thank you again for your time on this matter.

kindest regards

[Redacted]

[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
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[Redacted]

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: Public consultation response - Islandmagee Gas Storage Project Marine Licence ML 28\_12  
**Date:** 22 May 2020 12:58:47

---

To whom it may concern,

I would be grateful for the purposes of transparency if your department could confirm if the survey vessel Fugro Discovery which has been navigating around the coastline of Islandmagee for the last couple of weeks is conducting further survey work in relation to the above project either on behalf of Infrastrata PLC or others.

Regards,

[REDACTED]

On 10 Feb 2020 11:03 am, [REDACTED] wrote:

To whom it may concern,

I would be grateful if your department could provide some clarity regarding the announcement made by Infrastrata PLC via RNS on Friday morning, that the Public Consultation period is to be extended until 23rd March.

Kind regards,

[REDACTED]

On 6 Feb 2020 10:37 am, [REDACTED] wrote:

To whom it may concern,


Please find attached my response to the Public Consultation for Islandmagee Gas Storage Project Marine Licence ML 28\_12.

Please redact any personal information if publishing my response.

I look forward to your confirmation that my response has been received.

Yours faithfully,

[REDACTED]

**From:**   
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Various  
**Date:** 04 June 2020 20:59:43

---

Dear Team ,

Many thanks for your offer to forward the original preceding wallingford doc, that would be much appreciated .

With regard to your statement below :

“As previously explained to you and members of the campaign group there is no known timeframe for the consideration and decision making period, this position is unchanged. DAERA have two other consents to be consulted on and reviewed (water discharge and abstraction) and it is expected that the three decisions will be delivered at the same time by the department”.

I have now have further confirmation from the NIEA that a public consultation will take place for the licence to discharge and Abstraction Licence at some point in the future .

I appreciate that during these difficult and trying times it could be a while before this public consultation can take place , but would be very grateful if you could let me know in due course when it may begin .

Thank you for your assistance .

Stay safe

Regards



Sent from my iPhone

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Re: Islandmagee Gas Storage - ML 28\_12  
**Date:** 08 June 2020 07:36:06

---

FAO: [REDACTED]

I refer to my e-mail of 19th May and would be grateful to receive a response or, at the very least, an acknowledgement that it is receiving attention.

Whilst I wish to receive clarification on the query I raised as soon as possible, the said query should also be considered as forming part of my response to the Public Consultation.

I look forward to hearing from you in early course.

Regards,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 19 May 2020 07:30  
**To:** DAERA Marine Licensing Team <[REDACTED]>  
**Subject:** Islandmagee Gas Storage - ML 28\_12

FAO: [REDACTED]

[REDACTED]

I hope you are keeping well in these difficult times. I appreciate your working schedule may be somewhat different these days, but I'd appreciate it if you could clarify the current status of the Marine Licence application.

You may recall that at one of the information sessions I asked if the public would be given the opportunity to consider matters which may arise from responses received by DAERA to the Public Consultation. I have now seen that Infrastrata have stated that they expect to receive a request for further clarification. I attach the link to the full announcement in which they say:

*The Company expects to receive a request for clarifications from the Department of Agriculture, Environment and Rural Affairs ("DAERA") shortly, now that the public consultation process has closed. The Company is prepared to respond promptly to any clarification requests made by DAERA. Thereafter, the Company expects that a recommendation will be made by DAERA to Edwin Poots MLA, Minister of Agriculture, Environment, and Rural Affairs in relation to granting of the Marine Licence.*

*With the information currently available, the Company expects that this will meet its previously advised timeframe of committing to a Financial Investment Decision for the Project by the end of H1 2020. The Company understands that DAERA is still fully*



*functioning at this time, whilst observing the Government's COVID-19 advice.*

Will those clarifications and Infrastrata's responses be made available to the public?

As you can see, Infrastrata continue to advise their shareholders of the timeframe for the Marine Licence. I appreciate it is not within your control to monitor such announcements, but I wanted to bring it to your attention as I had previously made the Department aware of similar claims by the company.

Thank you for your assistance and I look forward to hearing from you.

<https://polaris.brighterir.com/public/infrastrata/news/rns/story/wk84nvw/export>

Regards,

██████████

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** Infrastrata survey boat?  
**Date:** 08 June 2020 09:56:01

---

Hi

I have just been watching a vessel Valkyrie and another smaller craft working off where Infrastrata's outlet proposed outlet pipe beside Castle Robin. They have been there from around 8 am this morning.

Please can you confirm if further surveys are being undertaken for this project's Marine Licence and if so, what they are?

Best regards

[REDACTED]

Sent from [Mail](#) for Windows 10

**From:** [REDACTED]  
**To:** [DAERA Marine Licensing Team](#)  
**Subject:** RE: Islandmagee gas storage project.  
**Date:** 08 June 2020 12:52:24

---

Good morning. Given several months have passed since the public consultation closed, would it be possible to know when we could expect a decision.

Regards

[REDACTED]

Sent from Samsung Mobile on O2

----- Original message -----

**From:** DAERA Marine Licensing Team <[REDACTED]>  
**Date:** 27/03/2020 08:58 (GMT+00:00)  
**To:** [REDACTED] <[REDACTED]>  
**Subject:** RE: Islandmagee gas storage project.

Thank you for the response to the public consultation, the closing date is today and will not be extended.

We have no time frame for when a decision will be made.

Regards,

Marine Licensing Team

---

**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 27 March 2020 08:25  
**To:** DAERA Marine Licensing Team <[REDACTED]>  
**Subject:** Islandmagee gas storage project.

Good morning.

Sorry for asking a seemingly trivial question in these difficult (virus) times but sitting at home in lockdown drives one to look for other distractions. I hope this finds you all fit and well presumably working from home.

Could I enquire if the closing date of today still applies for the consultation given that the last public viewing was cancelled.

If the answer is affirmative, could I be so bold as to enquire how long the decision taking process is likely to be?

If, on the other hand, a further delay is required, will an announcement be forthcoming?

Thanking you in advance for any light you could possibly shed on the matter.

Stay well.

Regards

██████████

Sent from Samsung Mobile on O2

**From:** [REDACTED]  
**To:** [REDACTED] [DAERA Marine Licensing Team](#)  
**Cc:** [REDACTED]  
**Subject:** RE: Islandmagee Gas Storage Project  
**Date:** 16 June 2020 13:13:40  
**Attachments:** [image001.png](#)

---

[REDACTED]

Thank you for your response.

Working from home is certainly challenging – I have then added complication of a two year old!

I understand that movement of cargo by sea is not regulated under the marine licence but it is an integral part of the environmental assessment. It is essential that further information is provided as to:

1. The proposed transport route;
2. The proposed loading and unloading destination; and
3. The road route used to transport the materials from the port to the development site.

I note that you appear to have received verbal assurances that there would be no new infrastructure and that there would be no use of private roads (perhaps you meant public roads?). As you will be aware, in order to properly assess the environmental impacts of the construction phase the Department must require further environmental information from the applicant to provide written details of these proposals.

Can you confirm whether the Department has issued a formal request for Further Environmental Information and if you have can you please provide me with a copy.

Kind regards

[REDACTED]

[REDACTED]

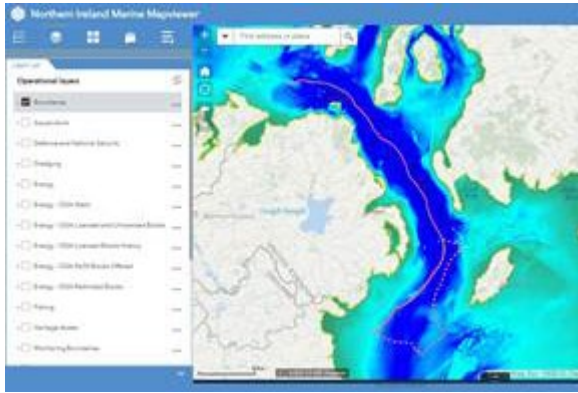
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**From:** [REDACTED] <[REDACTED]>  
**Sent:** 16 June 2020 11:49  
**To:** DAERA Marine Licensing Team <[REDACTED]> <[REDACTED]>  
**Subject:** RE: Islandmagee Gas Storage Project

[REDACTED]

Apologies for the late response in getting back to you, as you can appreciate working from home is not without its problems and working on a laptop without access to a printer is a new way of working, I have filled 5 notebooks in the last 10 weeks.





---

**From:** DAERA Marine Licensing Team

**Sent:** 03 June 2020 17:29

**To:** [REDACTED] <[REDACTED]>

**Cc:** [REDACTED] <[REDACTED]>

**Subject:** RE: Islandmagee Gas Storage Project

Dear [REDACTED]

Please accept our delayed acknowledgment to this email to [REDACTED] which was received on 16.4.2020. He will respond in due course.

We also note your correspondence dated 9.3.2020 and we will address the issues raised in response to the consultation.

Best wishes,

[REDACTED]

[REDACTED]

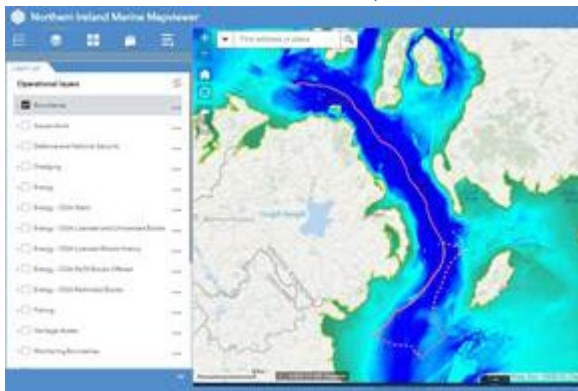
[REDACTED] Marine Licensing | DAERA Marine & Fisheries Division | 1st Floor |  
Klondyke Building | Cromac Street | Gasworks Business Park | Belfast | BT7 2JA

[REDACTED]

Telephone: [REDACTED]

<https://www.daera-ni.gov.uk/articles/marine-licensing>

Check out DAERA's new [NI Marine Mapviewer!](#)



---

**From:** [redacted] [mailto:[redacted]]  
**Sent:** 16 April 2020 16:59  
**To:** [redacted]  
**Cc:** [redacted]  
<[redacted]> DAERA Marine Licensing Team  
<[redacted]>  
**Subject:** RE: Islandmagee Gas Storage Project

Joe

Thank you for your email. I hope that you and your family are all safe and well.

I attach a link to an interview with the CEO of Islandmagee Energy recorded this week.

<https://youtu.be/A3j-E1A3810>

You will note that at 11.24 in the video he is discussing the gas project “with a transition later in life into hydrogen”. Storage of hydrogen has not been assessed in the ES, and is a fundamental change to the project. This has not been assessed or considered in the Environmental Statement. This demonstrates that the present Environmental Statement amounts to project splitting.

You will recall that we have raised, on behalf of No Gas Caverns Limited a wide range of deficiencies in the Environmental Statement. In particular we raised the failure to assess the traffic and transport impacts of transporting construction materials to and from the site. We note that the CEO has now gone on record stating that parts of the build will be fabricated at Harland and Wolff shipyard and transported by sea to the site (1.52 in video) “as access roads into Islandmagee are smaller”. The transport of materials by sea and the unloading of these materials has not been assessed. The application documentation does not identify where these boats will dock and whether any upgrades are required to existing facilities or whether new facilities will be required.

As this information has only just come to light, and the consultation event scheduled to take place during March was cancelled, please add this to our objection. We expect that this issue will be addressed and resolved through the consultation process.

I would also be grateful if you could confirm what the staffing arrangements are for the Marine Licensing team during the present Covid 19 situation and the anticipated timescales for responding to objections and commencing the iterative process of resolving objections as set out within the Marine Licence Guidance document.

Kind regards

[redacted]

[redacted]

---

**From:** [redacted] <[redacted]>  
**Sent:** 10 April 2020 15:30



**To:** [redacted] <[redacted]>  
**Cc:** [redacted] [redacted] [redacted]  
<[redacted]> DAERA Marine Licensing Team  
<[redacted]>  
**Subject:** Islandmagee Gas Storage Project

Hello [redacted]

Thank you for your email of 27th March which makes two points on behalf of No Gas Caverns Ltd.

**1. Clarification as to whether it is intended to request a further licence application to allow dredging works**

This point will be addressed as part of the response to consultation.

**2. A request that the consultation period be extended for a short period in light of the COVID-19 emergency**

The consultation closed on 27<sup>th</sup> March and the Department is considering the responses received. We are however keeping the situation under review and I will contact you when the COVID-19 emergency situation passes to respond to your request.

Best wishes and stay safe.

[redacted]

[redacted] | Marine Strategy & Licensing | DAERA Marine & Fisheries  
Division | 1st Floor | Klondyke Building | Cromac Street | Gasworks Business Park | Belfast | BT7  
2JA

Tel: [redacted]  
[redacted]  
Email: [redacted]  
Web: <https://www.daera-ni.gov.uk/topics/marine>

[redacted]  
<http://thinkbeforeprinting.org/>

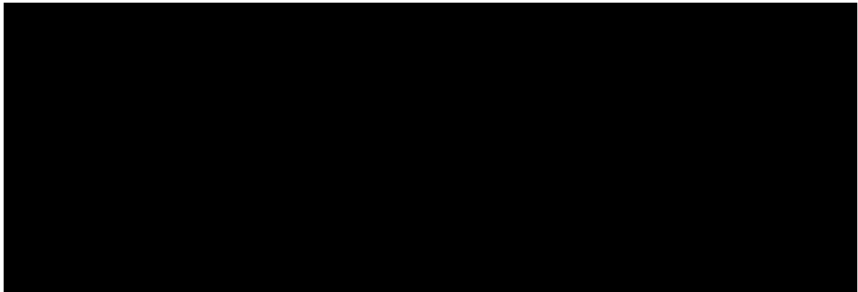
Check out DAERA's new [NI Marine Mapviewer!](#)



**From:** [REDACTED]  
**To:** [REDACTED] [DAERA Marine Licensing Team](#)  
**Cc:** [REDACTED]  
**Subject:** RE: Islandmagee Gas Storage Project  
**Date:** 16 June 2020 14:22:29  
**Attachments:** [image001.png](#)

---

Thanks for the clarification [REDACTED].



---

**From:** [REDACTED] <[REDACTED]>  
**Sent:** 16 June 2020 14:17  
**To:** [REDACTED] <[REDACTED]> DAERA Marine Licensing Team  
<[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>  
**Subject:** RE: Islandmagee Gas Storage Project

[REDACTED]

Yes, I should have said public roads. The Company indicated that they would be using the southerly pier of the two piers attached to the Ballylumford estate and this connects directly to their construction site without a need to use public roads. I will formally ask the Company for a statement to clarify this matter as part of the EIA process. My immediate concern is the Hydrogen issue and we have asked for clarification and will be discussing this at a meeting with the Company in the very near future.

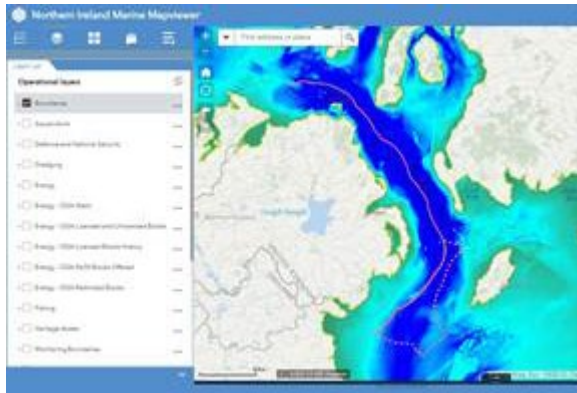
[REDACTED]

[REDACTED] | Marine Strategy & Licensing | DAERA Marine & Fisheries  
Division | 1st Floor | Klondyke Building | Cromac Street | Gasworks Business Park | Belfast | BT7  
2JA

[REDACTED]  
[REDACTED]  
[REDACTED]  
Email: [REDACTED]  
Web: <https://www.daera-ni.gov.uk/topics/marine>

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**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 16 June 2020 13:14  
**To:** [REDACTED] <[REDACTED]> DAERA Marine Licensing Team  
<[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>  
**Subject:** RE: Islandmagee Gas Storage Project

[REDACTED]

Thank you for your response.

Working from home is certainly challenging – I have then added complication of a two year old!

I understand that movement of cargo by sea is not regulated under the marine licence but it is an integral part of the environmental assessment. It is essential that further information is provided as to:

1. The proposed transport route;
2. The proposed loading and unloading destination; and
3. The road route used to transport the materials from the port to the development site.

I note that you appear to have received verbal assurances that there would be no new infrastructure and that there would be no use of private roads (perhaps you meant public roads?). As you will be aware, in order to properly assess the environmental impacts of the construction phase the Department must require further environmental information from the applicant to provide written details of these proposals.

Can you confirm whether the Department has issued a formal request for Further Environmental Information and if you have can you please provide me with a copy.

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** [REDACTED] <[REDACTED]>

**Sent:** 16 June 2020 11:49

**To:** DAERA Marine Licensing Team <[REDACTED]>  
<[REDACTED]>

**Subject:** RE: Islandmagee Gas Storage Project

[REDACTED]

Apologies for the late response in getting back to you, as you can appreciate working from home is not without its problems and working on a laptop without access to a printer is a new way of working, I have filled 5 notebooks in the last 10 weeks.

Following your email detailing the You tube link and references I wrote to the company on 11<sup>th</sup> May 2020 asking for clarification of their intentions with regards to plans to use the proposed caverns for hydrogen storage at a future date. They have yet to respond to me and I will be following up with them this week if a response is not forthcoming.

At the last public engagement meeting held in the Community Centre on February 20<sup>th</sup> 2020 I raised the issue of transportation by sea of the large modules directly to Islandmagee with company officials. They assured me that they would be using existing infrastructure to offload the blocks from where they will be transported to the construction site through private land not needing to use private roads. Movement of cargo by sea comes under the jurisdiction of Harbour-masters and the Maritime Coastguard Agency and not subject to a marine licence under MACA 2009.

The Marine Licensing Team is fully operational remote working from home with full access to the IT available in the office environment. We have all become proficient in the use of Teleconferencing and keep in daily contact. With regards to the timetable for responding to the consultation and determination of the licence, we have no set date in mind due to complexity of the project and the significant numbers of responses and questions raised. We are working towards a decision on the application for the Marine Licence in Autumn this year.

Regards

[REDACTED]

[REDACTED] | Marine Strategy & Licensing | DAERA Marine & Fisheries  
Division | 1st Floor | Klondyke Building | Cromac Street | Gasworks Business Park | Belfast | BT7  
2JA

Tel: [REDACTED]

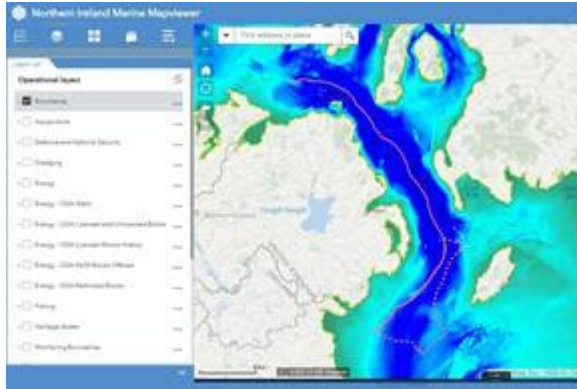
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Email: [REDACTED]

Web: <https://www.daera-ni.gov.uk/topics/marine>

[REDACTED]

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**From:** DAERA Marine Licensing Team

**Sent:** 03 June 2020 17:29

**To:** [REDACTED] <[REDACTED]>

**Cc:** [REDACTED]

**Subject:** RE: Islandmagee Gas Storage Project

Dear [REDACTED]

[REDACTED] acknowledgment to this email to Joe Breen which was received on 16.4.2020. He will respond in due course.

We also note your correspondence dated 9.3.2020 and we will address the issues raised in response to the consultation.

Best wishes,

[REDACTED]

[REDACTED]

[REDACTED] | Marine Licensing | DAERA Marine & Fisheries Division | 1st Floor |  
Klondyke Building | Cromac Street | Gasworks Business Park | Belfast | BT7 2JA

[REDACTED]

Telephone: [REDACTED] ([REDACTED])

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[REDACTED]

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** 10 April 2020 15:30  
**To:** [REDACTED] <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]> [REDACTED]  
<[REDACTED]> DAERA Marine Licensing Team  
<[REDACTED]>  
**Subject:** Islandmagee Gas Storage Project

Hello [REDACTED],

Thank you for your email of 27th March which makes two points on behalf of No Gas Caverns Ltd.

**1. Clarification as to whether it is intended to request a further licence application to allow dredging works**

This point will be addressed as part of the response to consultation.

**2. A request that the consultation period be extended for a short period in light of the COVID-19 emergency**

The consultation closed on 27<sup>th</sup> March and the Department is considering the responses received. We are however keeping the situation under review and I will contact you when the COVID-19 emergency situation passes to respond to your request.

Best wishes and stay safe.

[REDACTED]

[REDACTED] | Marine Strategy & Licensing | DAERA Marine & Fisheries  
Division | 1st Floor | Klondyke Building | Cromac Street | Gasworks Business Park | Belfast | BT7  
2JA

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