

P-04-648 Unconventional Oil and Gas Planning Applications – Correspondence from the Petitioner to the Committee, 06.11.15 – Further Comments

Thank you for the opportunity to comment on the Minister's response to our petition (P-04-648 Unconventional Oil and Gas Planning Applications).

We understand that Councillor Arfon Jones has already responded as Lead Petitioner on the original petition. We fully support the Councillor Jones' comments and would like to expand on them.

Frack Free Wales welcomes the Minister's remarks regarding Underground Coal Gasification (UCG), which reiterate previous comments by both the Minister and First Minister confirming that they are giving consideration to including UCG in the moratorium.

On the issue of boreholes and test drilling however, the Minister simply repeats previous statements on this issue and does not appear to take account of the comments made in our Statement accompanying the petition, which we therefore repeat here.

Test drilling for oil and gas is a very different prospect to drilling for water or checking the geology for engineering or building work.

These boreholes will extend to between 1,000 and 1,500 metres. No three-dimensional seismic surveys have been carried out and the companies will be drilling blind to a certain extent. When testing for Coal Bed Methane they will often be drilling in areas riddled with old coal workings, many unrecorded.

If the drillers were to strike localised faults or unrecorded cavities there is a significant risk that materials from the drilling – lubricating chemicals, drilling muds and contaminated water – could break out from the borehole and find their way into local water courses or aquifers.

Test drilling for oil and gas takes significantly longer than the boreholes mentioned by the Minister. From plans submitted by the companies we can see that they are proposing to drill 24/7 over a period of between 8 and 12 weeks. Drilling will create noise, light and air pollution throughout this period, posing a significant risk to the amenity of residents and visitors and disturbance of local wildlife.

It is illogical to allow test drilling when there is a moratorium on extraction in force. This sends all the wrong signals to the drilling companies, implying that the moratorium is nothing more than a PR exercise and could easily be lifted at some point in the future.

The Minister does not appear to be considering the issue of the “perceived fears of the public” which “are a material planning consideration that should be taken into account in determining whether a proposed development would affect the amenity of an area and could amount to a good reason for a refusal of planning permission.” (Planning Policy Wales (Edition 7), paragraph 3.1.8).

With widespread concerns about unconventional gas development and related technologies, as demonstrated by this and a number of other petitions, the Welsh Government should be sending a clear and consistent message to the companies that no drilling of any kind will be allowed in Wales until they can prove beyond reasonable doubt that it can be done safely. Current scientific evidence clearly shows that this is far from being the case.

If this industry were to get a toehold in Wales we would see widespread industrialisation of our countryside, including areas with special protection.

Given the Welsh Government's commitment to Wales playing its part in dealing with Climate Change and their oft stated preference for the development of renewable and carbon free sources of energy, why would we even contemplate prospecting for a new source of fossil fuels?

Yours,

Keith M Ross

for Frack Free Wales