

Planning reference: P 2013 0660

Welsh Government reference: H6955/A/14/2218276

Description: Part of field west of Commonwood Farm and south of Borrass Road, Commonwood, Holt, Wrexham.

Response to application P 2013 0660 from Mr P Beer, 4 Penfold Hey, Upton, Chester, Cheshire CH2 1ES

I without reservation, support Wrexham County Borough Council's decision to reject the planning application by G P Energy to test drill for Coal Bed Methane at Borrass Commonwood.

Production of coalbed methane gas goes against the policy of tackling climate change. Methane is a greenhouse gas. To meet our carbon budgets, electricity production must be completely de-carbonised by 2030. Investing and allowing a new industry of producing methane gas from underground coal beds is contrary to meeting these targets. This application is for drilling an exploratory borehole at this site, although this does not produce methane gas in itself, it creates a precedent, and there is no reason to drill an exploratory borehole if the production of any gas found at the site is contrary to meeting our greenhouse gas emissions.

I believe this industry to be potentially very environmentally damaging, and with this site having no Environmental Impact Assessment, no baseline measurements will be taken, so any damage or harm caused during or after the process will be almost impossible to trace and report

The Precautionary Principle is a principle at the heart of environmental law to which the UK Government has committed since the UK signed the Rio Declaration on Environment and Development in 1992. In regards to this site not having a EIA as previously mentioned, the local authority is not applying a precautionary approach to this application from an industry with noted environmental risks.

Although this application is for temporary access to the site, it is well off of main roads and when this same company drilled earlier this year in Farndon, considerable damage was done to the short stretch of country lane that the lorries had to use to access the site from the main road, and I believe that in this site at Borrass Road, more damage will be done to the roads by the volume of heavy traffic that will be needed to carry out the drilling and restoration of the site.

After restoration of the site, the borehole will be plugged and capped and effectively abandoned. Dart Energy are in the process of being taken over by Island Gas Ltd, who held a public exhibition recently in Ellesmere Port, and when representatives were asked about their aftercare of boreholes, they informed me that they do not actively monitor their abandoned boreholes, so if there was any leakage it could continue indefinitely and would eventually result in the taxpayer being liable for any clean-up operations.

Again, drawing experience from the same operation that was carried out in Farndon earlier this year, this process is very noisy, both from the sound of the drill and from the massive increase in heavy traffic in the area. The sound of the drill and generators was considerably more noticeable at night from the surrounding homes.

I also find that there is very little information about what happens to the drilling mud and waste materials from this process. At Farndon, some of this waste matter ended up being washed onto the field next to the site after a spillage, and I can find no information about what should be happening to this waste. Do they actually have a plan for it or do they just think 'out of sight, out of mind?'

Experience shows that worldwide, this industry is a dirty and polluting one, previous claims made by proponents of the industry about increasing jobs, reducing fuel prices and lessening carbon emissions have all since been dismissed. Claims that production of this gas will increase our fuel security and make us less reliant on gas imports are unfounded as the gas produced will be sold on the global energy market, rather than produced solely for domestic use. Again, I understand that this particular application is for a temporary exploratory borehole, but these claims are made by Dart Energy to push the importance of having these test drills in the first place. If the industry is not viable for the reasons that they use to promote the industry in the first place, I don't see that there is any need for them to test drill in the first place just for the sake of it.

Yours,

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