

Esteemed councillors and planners,

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

Congratulations on refusing this application already. I beseech you to sustain the refusal of this planning application no matter what.

I pledge to support any required legal costs to successfully overturn any appeal by Dart. It is critically important to us all that this destructive technology should not go ahead, on grounds of sheer risk to our population and the wellbeing of our common environment. There are well-established superior alternatives to this technology which I would be happy to expound upon on request.

If nothing else, please consider this from below: "Dart Energy is developing operations in the UK precisely because Australia has tightened up regulation of the industry in the wake of environmental destruction, pollution and adverse health impacts caused by drilling for coal bed methane there. All coal bed methane activity within 2km of residential areas has now been banned in New South Wales, where Dart previously operated."

So, I urgently require to register with you, my concern over the following facts.

1. The proposed development is environmentally unsustainable, contrary to Minerals Planning Policy Wales which states that oil and gas should only be extracted in sustainable locations. The site lies in a rural location and is served by an inadequate highway network. To allow this form of industrial use into a rural area would result in a significant increase in HGV traffic movements, increased noise levels and an adverse impact upon the landscape, and would be contrary to Policy GDP1 of the Wrexham Unitary Development Plan (2005).
2. The proposed development involves an industrial form of development outside recognised settlement limits within open countryside. To allow the development would therefore be contrary to Policies PS1 and PS2 of the Wrexham Unitary Development Plan (2005), which seeks to direct new development to within settlement limits and ensure that it does not materially detrimentally affect the countryside or the quality of the natural environment.
3. The submitted geophysical survey does not provide sufficient information in respect of the impact of drilling upon the vertical and lateral movement of gas. To allow this development without sufficient information could result in geological instability, potential subsidence and pollution as a result of the release of gas and would be contrary to Policy GDP1 (f) and (i) of the Wrexham Unitary Development Plan (2005).

Furthermore,

- Traffic movements will be substantial and the roads around the site are not suitable for this type of traffic even for a limited period of time. We know from Dart Energy's test drilling exercise at nearby Farndon just how many truck movements are involved. The Farndon site was down one straight stretch of side road. Even so, kerbstones and verges were badly damaged. The Borrass site is considerably further from the main road along winding and narrow country lanes, and traffic alone will cause considerable inconvenience, disruption, noise, pollution and likely physical damage.
- Records of coal mining do not cover the entire long history of coal mining in the area and there are therefore many unknowns about previous mining activity at the proposed drill site. The Gresford Mining disaster was caused by a huge gas explosion. Even a test drill runs the risk of hitting a gas pocket and leading to a large gas escape and possible explosion. There is also a risk of subsidence. In nearby Erddig some years ago, a whole area of land collapsed into old mine workings. Drilling activity will increase this risk.
- Test drilling will go down through the Kinnerton Formation, a major aquifer, with a risk of polluting the groundwater and local water supply. Once the aquifer is breached, pollution could be an ongoing problem.
- The appellants say that on completion, "the borehole will be plugged and abandoned". The 'abandoned' borehole could leak at any point in the future and because it won't be properly monitored, this could continue without anyone being aware of it. All boreholes will eventually fail. The cost of dealing with such a failure will fall on tax payers.
- The 2012 DECC report entitled "The Unconventional Hydrocarbon Resources of Britain's Onshore Basins" shows that the Borrass site is outside the area where coal bed methane extraction would potentially be successful. This is due to the absence of an impermeable layer of rock that would allow the successful dewatering of the coal. It is a requirement of the PEDL licence that test drilling be carried out and the government will claw back licences where no test drilling takes place, but it is unacceptable to allow test drilling and all its associated environmental disruption and risks when the coal bed methane extraction it is testing for cannot work. This matter needs to be urgently addressed by government. In the meantime, it makes no sense to permit pointless exploratory drilling permission.
- Dart Energy is responsible for environmental violations in Australia and in the UK including dumping benzene polluted water into the Firth of Forth. Dart Energy's promises to protect the environment and comply with planning conditions cannot be trusted. Dart Energy is developing operations in the UK precisely because Australia has tightened up regulation of the industry in the wake of environmental destruction, pollution and adverse health impacts caused by drilling for coal bed methane there. All coal bed methane activity within 2km of residential areas has now been banned in New South Wales, where Dart previously operated.
- People who have enquired about insuring their homes in the vicinity of coal bed methane exploration sites have been told that they will not be able to get insurance against damage caused by CBM drilling. It is unacceptable to allow developments that will render people's homes uninsurable or unsaleable.

Once again, along with many others, I pledge my full support to uphold your decision to prevent Dart Energy from operating here.

Please keep up your best work in these challenging times, we're all with you on this one!

Best regards,

Matt Rhys-Roberts
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