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The Planning Inspectorate
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

6 August 2014

Dear Sir or Madam

Re: 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.

I am writing in support of Wrexham Council's decision to turn down GP Energy's application to test drill for coal bed methane (CBM), which I believe was the right decision both for the reasons the council gave and for additional important material considerations some of which apply not just to this application but more generally.

For example, I believe the whole basis of the application is fundamentally flawed and that this issue (point 1 below) should be considered as a matter of urgency by the government for all such applications across a wide geographical area where PEDL licences have been issued but where the geology means that CBM extraction is unfeasible. Likewise, the decision not to require an Environmental Impact Assessment here or at other proposed sites is a travesty and should be urgently reviewed by Welsh Government and by Westminster (point 2 below), taking proper account of the precautionary principle, the experiences in other countries where coal bed methane extraction has taken place and the obvious critical need for a baseline assessment before beginning any work on such a site. For all such applications, our obligation to tackle climate change and reduce carbon emissions should be paramount (point 3 below). Both the application under appeal and the longer term intentions of the company to drill for gas as a commercial enterprise fly in the face of Wales Planning Policy on climate change.

Point 1: Whole application is fundamentally flawed as CBM extraction cannot work in this area

The government's DECC report "The Unconventional Hydrocarbon Resources of Britain's Onshore Basins" (2012) is clear that the Borrass site - and indeed many other sites within the PEDL areas including the nearby already drilled site at Farndon just over the border in Cheshire - are manifestly unsuitable for CBM extraction. CBM extraction requires the coal seam to be dewatered before gas may successfully be extracted and the absence of a layer of impermeable rock above the coal seams in this area renders dewatering of the coal impossible and the whole enterprise unfeasible.

Given that test drilling within a certain timescale is a prerequisite if companies are to retain their PEDL licences, we have to ask whether the company is merely applying to test drill to avoid losing the licence. Alternatively, the application for CBM test drilling may be a smokescreen for the company's real longer term intentions in the area, which could be to drill for shale gas and use hydraulic fracturing to or to attempt underground coal gasification for example, in which case the application has not been made with honest intentions or in good faith and should be rejected.

It is completely unacceptable to allow test drilling for coal bed methane on any site where the geological conditions as explained in the government's own report mean coal bed methane extraction will NOT be successful. Test drilling involves disruption, environmental disturbance and risks. These cannot possibly be justified in such circumstances. It would be like approving an application for an open cast coal mine in an area where there is no coal!

Point 2: No Environmental Impact Assessment (EIA)

I understand that the Welsh Government has deemed that no EIA is required in connection with this application. Without a baseline assessment it will be difficult if not impossible to evaluate whether any problems that subsequently become apparent are linked with the drilling activity. Failure to insist on a proper, independent EIA before any work starts on the site is negligent and wholly unjustifiable.

The 2012 Planning Policy Wales makes it clear that polluters should be made to pay for the damage they cause and that pollution should be prevented wherever possible. Experience at other test drill sites has shown that there are pollution risks and this company (GP Energy is a wholly owned subsidiary of Dart Energy) is responsible for environmental violations including dumping benzene polluted water into the Firth of Forth. Dr. Mariann Lloyd-Smith, senior adviser to Australia's National Toxics Network, has expressed serious concern about this. There is no safe level for benzene, a carcinogen, in drinking water and the pipes used by Dart were plastic, through which benzene can migrate. The application could legitimately have been turned down on the grounds that this is an unfit company to trust with any aspect of our environment, but to allow any work to go ahead on such a site without a baseline measure to compare against during and after the work would be a travesty.

Dart (GP) 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, along with fierce community resistance. All coal bed methane activity within 2km of residential areas has now been banned and a six month freeze on all new exploration licences has been put in place in New South Wales where Dart previously operated.

Point 3: Climate change and carbon considerations

Planning Policy Wales 2012 makes it clear that planning authorities have an obligation to tackle climate change and reduce greenhouse gas emissions. It is an abomination that unconventional gas extraction (UGE) applications are being encouraged by the government when the imperative should be to develop renewal energy options. Methane is a carbon based fuel, more damaging to the environment than carbon dioxide and there is a significant carbon footprint even just for the exploratory phase which involves 24/7 drilling activity, multiple truck movements and waste disposal etc. Planning authorities would be negligent in their duties if they allowed such proposals to go ahead.

Furthermore, any claims that UGE is part of a transition to a low carbon future are erroneous. Extraction will involve multiple drilling rigs - typically 8 - 16 per square mile - and the wholesale industrialisation of our countryside with a significant carbon footprint even before any of the extracted gas is used for fuel. The document by McKay and Stone used by the government to defend the unconventional gas industry's carbon record has been critically analysed and exposed in an article in *The Ecologist* by Paul Mobbs entitled '*Fracking as bad for the climate as coal: UK's dodgy dossier exposed*' (May 2014). In particular, escaped methane levels are many times greater than declared and the estimated impact on the environment has been downplayed by over-estimating well production levels.

There are many opportunities for us to cut our energy consumption and we know from countries like Germany that renewable energy alternatives are perfectly possible, that these could create many sustainable jobs and that the benefits can be realised quickly and without adverse impact on the environment that unconventional gas extraction will bring.

Point 4: Risks of drilling - explosion, subsidence, pollution

It was a huge gas explosion that caused the nearby Gresford Mining Disaster, with the bodies of virtually all those killed still entombed in the mine. As well as community sensitivity around this issue - many locals are related to one or more victims - there are very real fears that even test drilling could lead to a large gas escape and possible explosion above or below ground.

The applicant states that there is no evidence of mine workings in close proximity to the site. Records available of coal mining activity in the area are incomplete and it is therefore insufficient to examine the available records and make decisions about the suitability of the site for test drilling based on those records, which only go back maybe 150 years. The risk of explosion is one concern, and the possibility of subsidence in the area cannot be discounted either. 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 penetrate the Kinnerton Formation, a major aquifer, with the risk of polluting the groundwater and local water supply. Once the aquifer is breached, pollution could be an ongoing problem (see also point 5 below). This risk is likely to be even greater if geological faults are present, and the applicant's confidence that they are not does not stand up to scrutiny, as a comprehensive examination of the area's geology does not appear to have been undertaken and there are in fact faults in the vicinity.

The test drilling process itself may be temporary, but the environmental impacts could well be damaging and long lasting. None of the above are acceptable risks to take, particularly in view of point 1 above.

Point 5: Abandonment of test borehole and risks of future failure

No provision has been made for the ongoing monitoring or maintenance of the borehole once it has, as stated by the appellants, been "plugged and abandoned". All wells will leak eventually, and there is no provision in the application either for ongoing monitoring nor for dealing with any future problems. In all probability, this responsibility will fall on the local authority and the expense will be borne by the taxpayer. Even more crucially, without monitoring, a leak (for instance of methane and other toxic substances into the atmosphere or water) could go undetected for weeks, months or even years with possibly disastrous consequences. In a study conducted in 2010, 44% of gas wells in Australia's Tara CBM gas field were found to be leaking according to the Queensland mines department. Any methane leakage from the well will have a climate change impact as per point 3 above.

Point 6: Traffic and disruption

The proposed test site is located down small country lanes from the main road. I know from personal experience while in attendance during Dart Energy's test drilling exercise at nearby Farndon just how many truck movements are involved, how large some of the trucks are and how the verges and kerbs at the junction with the main road were damaged as the trucks turned in and out of the lane. The Farndon site was down one short stretch of side road while the Borrass site is considerably further from the main road along narrow country lanes and traffic alone will cause inconvenience, disruption, noise, pollution and likely physical damage.

The appellant's argument that this activity is temporary in nature is weak, especially since this application is both part of an ongoing pattern of test drilling in the licence area and also ostensibly a precursor to future actual drilling for gas, which to be economically viable would necessarily involve widespread industrialisation of the countryside and ongoing heavy truck movements, noise and disruption in the rural environment. It makes no sense to consider an exploratory application without reference to likely future activity. The lanes around the proposed site are not suitable for large truck movements either in the short or longer term.

Point 7: Impact on local community's mobility and ability to insure their homes

House prices are likely to drop if rural areas like Borrás Commonwood are targeted for drilling activities. Experience in the US and Australia shows that areas subjected to extreme gas extraction leads to the industrialisation of the countryside which in itself will reduce the value of properties and the willingness of those renting to move into the area.

In addition, many people have contacted their insurance companies to inquire about insuring properties close to CBM and shale gas drilling sites and have been told either that they will not be able to insure houses near drilling sites at all or that they won't be able to insure against any risks that the drilling may cause. Where insurance is still obtainable, premiums will likely be very substantially increased or. It is unacceptable to allow developments that will render people's homes uninsurable (or with unaffordable insurance premiums), unsaleable and unrentable. This will also have a negative impact on workforce mobility. People trapped in negative equity situations or otherwise unable to sell their houses simply won't be in a position to move.

Summary

In summary, this application is ill-founded and possibly made in bad faith, since the already known geology of the area as noted in the government's own publication precludes the success of the activity the application purports to pertain to (coal bed methane extraction). In addition, to allow any drilling activity without a prior, independent environmental impact assessment would be negligent. The proposals are not consistent with climate change considerations or Wales Planning Policy on the environment. The risks of explosion, subsidence, pollution and future failure of the borehole are real and have not been addressed. The company has a poor record on environmental protection and its promises in that regard are therefore not credible. The location of the site makes it unsuitable for such a project, even in the short term, because of the narrowness of the country lanes and the distance from the main road. The likely impact on house prices, saleability, rental value and insurance are not immaterial and should properly be given consideration.

I would be grateful if you would inform me of the outcome of this appeal once the decision has been made.

Yours faithfully

Genevieve Bove