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WREXHAM
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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.

06/08.2014

Re: Planning permission appeal by GP Energy Ltd in respect of WCBC's refusal to grant planning permission for Drilling of exploration borehole (requiring 24 hour operations) to remove a core of coal for sampling and site restoration following cessation of drilling operations

To Whom It May Concern,

As a nearby resident, I wish to support Wrexham Council's refusal to provide planning permission in respect of the case above as an interested party.

Wrexham council has clearly considered the application and refused it in respect of established policies drawn up in The Wrexham Unitary Development Plan (2005).

To undermine* the stated policies of an established, long lasting plan without proper justification is to undermine* the authority of the council and would lead people to believe that business is above the law/borough rules.

** In my opinion it is worth noting the word undermine has always had negative implications and it is ironic that that's what they want to do during and after the appeal.*

I am led to believe that the grounds for their appeal is that the disruption will be temporary however while the activity might be temporary, the long term affects/effects may not be and yet they publicly declare their intention to 'abandon' the bore hole once they have completed their operations.

I am sure you do not need reminding that the known effects of this can include water contamination, an escape route for poisonous methane gas and/or explosions from sealed routes.

If permitted, the drilling route will pass through Kinnerton Formation, a major aquifer so the chance of contamination (and permanent problems) is increased.

By considering the impact of similar operations, it is reasonable to assume the type and frequency of lorries carrying specialised drilling equipment will lead to permanent deterioration of the roads, kerbs and surrounding environment which are not equipped to deal with high volumes of traffic.

The increased activity together with drilling blind into an area with a history of underground gas explosions (inc. the Gresford mining disaster 1934, which claimed 266 lives) will dramatically increase the risk of subsidence in an area (so much so in similar sites insurance companies have

refused to insure property) so another permanent effect of 'temporary' drilling is uninsurable and unsaleable property.

The burden to prove that the environment will not be harmed during this investigation (inc. no loss of wildlife species to the area) is on the applicant - it is not the public's duty to prove damage will occur - however without an independent Environmental Impact Assessment, any evidence they submit or any assurance they offer is unreliable because the character of the applicant (Dart Energy) has a record of illegal environmental activities including UK including dumping benzene polluted water into the Firth of Forth. According to the Centers for Disease Control and Prevention's website, the result of ingesting benzene gas can include vomiting, irritation of the stomach, dizziness, sleepiness, convulsions, rapid or irregular heartbeat and death.

It also says that a person vomiting because of swallowing foods or beverages containing benzene, can develop breathing problems and coughing due to the vomit could be sucked into the lungs and that direct exposure of the eyes, skin, or lungs to benzene can cause tissue injury and irritation. Assurances they have previously submitted in respect of drilling sites have been proven to be unreliable and resulted in automatic rejection of any application within 2km of residential areas. The proposed site is surrounded by residential dwellings.

Lastly (in my reasoning though many more issues exist), independent evidence presented in the 2012 DECC report "The Unconventional Hydrocarbon Resources of Britain's Onshore Basins" shows that the Borrass site is outside the area where coal bed methane extraction is likely to be successful due to the absence of an impermeable layer of rock required for the successful dewatering of the coal.

The willingness of the company to expose people to the well documented risks of deep bore drilling despite the low odds of being successful demonstrates a complete disregard for anything other than potential profit.

By law, this type of activity is not allowed without permission and permission is granted when the applicant can prove their credibility, environmental consideration and a valid need. Dart Energy cannot prove any of those requirements.

Yours faithfully, Anita Howard

PS. Please keep me informed of the appeal decision and any arguments that counter my understanding that it is up to the applicant to prove themselves reliable rather than the public to prove them unreliable. Or how they applicant can ever be considered reliable given their known history and reputation.

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