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From: Planning
Sent: 14 September 2016 23:17
To: Planning
Subject: Comments on NYM/2016/0559/FL - Case Officer Mr M Hill - Received from Mr Kit Bennett at Frack Free York, 106 Huntington Road, York, YO31 8RP

I object to the proposal contained in application NYM/2016/0559/FL. According to the terms of the original application for the Ebberston Moor 3 site, the site should already have been restored and returned to agricultural use in August 2016. Third Energy should not be allowed to maintain the Ebberston Moor 3 well pad and the associated gas well for another three years, but should instead immediately begin the process of restoring the site.

The application lacks detail about Third Energy's plans for the future of the site. This means that it is very difficult to assess, the ultimate consequences of a decision to accept the application. This lack of clarity should be reason enough to reject the application, as it is clear that it is simply the thin end of the wedge. We should expect further, more harmful proposals to be submitted at a later date, if the precedent is set now to allow the continued maintenance of a gas well that should already have been permanently decommissioned. There are two possible outcomes if the application is agreed. One is that Third Energy makes no further application to develop the site. This will mean that the existing visual impact and disruption caused by the development will continue for another three years with no benefit. The other possibility is that Third Energy will submit another application for planning permission related to the Ebberston Moor 3 site within the next three years. Such an application would likely propose forms of development that are entirely unsuitable for a National Park and harmful to the wider environment. However the prospects of rejecting such an application would have been unfairly weakened by the granting of planning permission on this occasion, in order to facilitate future development that is, as yet, unspecified.

The maintenance of the site, as described in the application, would prolong the negative impacts that the existing well pad has on the area, while offering no benefit. The site has a visual impact as a form of industrial industrial development of the countryside. According to the National Planning Policy Framework, "great weight should be given to conserving landscape and scenic beauty in National Parks, ... which have the highest status of protection in relation to landscape and scenic beauty." The original planning permission was granted under the condition that the development was temporary and the site would be restored after three years. Disregarding that condition and allowing the well pad to stay in place for another three years cannot be regarded as giving great weight to the landscape and scenic beauty of the National Park. Local residents would also be inconvenienced by continued traffic to and from the site. Although the applicant claims that there would be only one vehicle journey to and from the site during the maintenance phase of the development, the reliability of this commitment is called into question by the applicant's use of more vehicles than were planned during the drilling of the well in 2013.

The application's supporting document calls for the development to be permitted, so that gas production can take place in future, after new methods for producing gas from existing wells have been piloted at other sites in the same petroleum license area. At the current time it is impossible to know what impacts these new techniques would have at Ebberston Moor 3 if they were implemented there, as no details are given. We don't know if hazardous materials would be brought to site, stored, or used there. We don't know what risks the groundwater, which is used as a source of drinking water, and is protected as part of Groundwater Protection Zone 2, would be subject to. We don't know how much contaminated, produced water would be generated, or how it would be disposed of. We don't know how many vehicle movements would be needed for the new techniques to be used at Ebberston Moor 3. We don't know how much air pollution would be generated by the new techniques, or how much greenhouse gas emissions they would generate. Despite all these unknowns the National Park is being asked to approve the application in order to enable these unspecified new techniques. If Third Energy wish to use new techniques to produce gas at Ebberston Moor 3, they should specify what they are and what their impact are, in the current application, rather than leave them concealed behind a veil of secrecy. Third Energy try to justify the application on the grounds that the impacts of a new development would be greater if they have to establish a new well pad and drill a new

well. This argument makes the unreasonable assumption that any future application for development they make will be granted. The real way to reduce environmental impacts is to reject this application and any subsequent applications for gas production at this site.

One possible future we know Third Energy have in mind for Ebberston Moor 3 is the drilling of an additional gas well, as they state this in their supporting document. Such a development would bring further disturbance to the area, generating noise and air pollution. It would also put groundwater in the area at risk. Since the original planning permission for the site was granted, the site has been made part of Groundwater Protection Zone 2. I do not think drilling gas wells is a suitable activity for a National Park or Groundwater Protection Zone 2. The industrial nature of gas drilling is not compatible with the scenic beauty of a National Park, while the problem of well casing failures, which are widespread in the oil and gas industry, put at risk groundwater which is needed for human consumption. The drilling of a new gas well would also subject the area to a great increase in HGV traffic, as occurred during the drilling of the existing well at the site. When the existing well was drilled, the HGV traffic generated was higher than expected. This traffic led to damage to the road surface and a church wall, incidents with cyclists and horse riders and the death of a dog. The level of HGV traffic generated by the drilling of a new well will be just as difficult to predict and is likely to lead to similar problems.

Another possible future use of the Ebberston Moor 3 site mentioned in the supporting document is the practice of lowering the water table in gas producing formations and injecting produced water into the Sherwood Sandstone with an injection well. The proposed use of a site in a National Park and Groundwater Protection Zone 2 for an injection well is completely unacceptable. Injection wells cause earthquakes. In one recent case in the United States, a magnitude 5.8 earthquake caused a suspension in the use of injection wells in Oklahoma, but this suspension was too late for some, as six buildings were rendered uninhabitable. Oklahoma has experienced a large number of earthquakes since the introduction of injection wells to the state, in an area not previously known for significant seismic activity.

Another effect of Third Energy's proposed method of lowering groundwater would be to make climate change worse. Existing reserves of fossil fuels are already more than large enough to cause dangerous climate change of more than 2 degrees above pre-industrial temperatures. The application of new techniques, such as the one proposed by Third Energy, will result in previously inaccessible fossil fuels being produced. As fossil fuels are certain to be burned once they are produced, such new forms of gas production must be opposed. Any planning application for the production of fossil fuels should be judged on the carbon emissions that would result from the use of the fossil fuels produced, not just carbon emissions taking place on site. The National Park must consider the effect the application would have on the UK's obligation under the UN Framework Convention on Climate Change and associated treaties and it's obligations under the Climate Change Act.

In conclusion the proposed development would have consequences for climate change, air pollution, water pollution, traffic levels and the visual environment that cannot be quantified at the current time. This lack of clarity is the result of the applicant's choice to submit an application for three more years of maintenance, without making clear what the real plans for the site are. The application should therefore be rejected and the site restored as soon as possible.

Comments made by Mr Kit Bennett of Frack Free York, 106 Huntington Road, York, YO31 8RP

