

**Ref: Application - 20/00513/FUL - OBJECT**  
**Submitted 02 July 2020**

## Organisation - **Frack Free Isle of Wight**

Frack Free Isle of Wight submits this general representative **OBJECTION** to UKOG Investment PLC's application for oil exploration and appraisal based on the following:

### **Non Compliance with Island Planning Policies**

#### **Resident Amenity**

#### **Biosphere Status**

#### **Claims of Temporary Development**

#### **Sustainability and Viability of the project**

#### **Ecological Impact**

#### **Pollution and Contamination Risk**

#### **Traffic**

#### **Economic and Employment Considerations**

#### **NPPF Requirements for UK Supplies & Oil Security**

#### **Inadequate Data regarding CO<sub>2</sub> Equivalent emissions and additional Greenhouse Gases**

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### **Non-compliance to the Island Planning and AONB Policy**

UKOGs proposal does not adhere to Isle of Wight planning policy guidance. We reference the following:

**SP5** To protect, conserve and/or enhance the Island's natural environment. Development proposals should account for the environmental capacity of an area, and where appropriate, contribute to environmental **conservation and enhancement**'.

**DM13** - To protect, enhance and manage a network of green infrastructure assets. Development proposals should protect and enhance the **integrity of green infrastructure, enhance and increase the coverage and connectivity of green infrastructure**, including off-site contributions where on-site provision is not possible, and **provide mitigation for the loss of green infrastructure assets**.

### **Residents Amenities.**

As noted in the AONB management plan, the "National Planning Policy clearly states there should be a presumption against major development within or affecting the AONB. The intimate and fragmented nature of Isle of Wight AONB, the complexity of its landscapes and diversity of their character, makes the area sensitive to change and reduces its ability to accommodate large scale development."

This site will provide no improved local amenity whatsoever. It will be a blight due to the proximity to the AONB and bridle path which forms part of the route each year normally for Walk The Wight and other hiking trails so popular with locals and holiday makers.

Policy P52 of the 'Policies for energy from Isle of Wight AONB Management Plan (2019 - 2024)'

"Ensure development proposals relating to energy fully consider the impacts on the landscapes and seascapes of Isle of Wight AONB and take full regard of the purposes of the designation."

The application does not consider the indirect effects it will have upon the surrounding area of outstanding natural beauty.

### **Biosphere Status**

The UK MAB will monitor whether our biosphere status complies with the UNESCO statutory framework of the world biosphere network, and determine whether it may maintain this status. The potential for loss of our Biosphere status will be an issue with regard to short or long-term onshore fossil fuel production, by changing the use of current food producing, arable land, within a key agricultural area into a 2.5 hectare industrial oil well site. This should be taken into consideration during determination by the committee.

This planning application, if granted, will enable an industry which does nothing to "support, balance or enhance the locality, bring lasting employment or sustainable resources" for the Island

### **Temporary development.**

This is not a "temporary development", as claimed by the applicant, by any stretch of the imagination, since it is nonsensical to spend vast sums of money to put a hole in the ground just to fill it in 3 years later.

If granted however, a precedent will be set and would be challenged in the future if further applications in other locations across the PEDL for exploration and appraisal are rejected. Permission creep brings industrialised well pad creep.

Additionally because of the current biased, predetermined weighting of the NPPF strategy in favour of such granted developments, follow-up planning applications for full production up to 20 years despite uneconomical oil flow would be extremely difficult to refuse on the grounds that the most damage at the surface to the environment has already been done.

### **Sustainability and Viability.**

The amount of oil to be garnered from the quoted Portland 3z exploration well is approximately 3.7 million barrels and is not held in a conventional reservoir of oil. Due to the nature and poor porosity of the strata indicated in the applicant's documentation, it is admitted that it requires horizontal drilling of one well into the formation to appraise economical recovery.

Additionally the applicant is allegedly unable to enhance recovery of oil from the strata given the claim of "no artificial stimulation" and the "oil will flow naturally to the surface" of the well bore.

However June 30th statements from the applicant's recent RNS now indicates they are considering "additional stimulation" to their latest horizontal well in Surrey to boost production.

Nevertheless historical data from similar sites which, under similar restrictions, indicate that it could take between 5 to 10 years to extract if 6 or 7 wells are drilled.

Data for 2019 also shows the UK uses between 1.4 and 1.6 million barrels per day. Please do the maths and you will see how this cannot be viable or sustainable.

### **Ecological Impact**

Local knowledge data of the area indicates the importance of the site area for Bats, Dormice and Badgers although the applicant's documentation reveals that data used for the Bat and Dormice mitigation in this application was collated at the end of 2018. The studies are repeated and undertaken every two years so the risk data for this application would be out of date at the time of the destruction of the area for the well pad and track.

It is disingenuous to suggest that, if after 3 years the site is unproductive, the site could be returned to its original state. Stripping the soil away, adding substances and compaction, damaging the biology of the soil and the creatures that enrich and enhance it, will not be replaced on decommissioning with topsoil with the hope of having the same ecological biodiversity as the original site.

Newchurch Moors and an additional 100 acres of East Wight are being transformed and rewilded into diverse habitats for struggling farmland birds such as the endangered ciril bunting and other wildlife, by the Hampshire and IOW Wildlife Trust. The ecological importance of these new habitats to save species is far more important for the island and NOT the place for neighbouring oil wells.

### **Pollution and Contamination**

The proposed drainage system for field run off is poor since the entry track to the oil site is not protected by bunding or a surface impermeable layer and in the event of spill of contaminants due due to leakage from transporters or vehicle accident on the track this will risk surface stream contamination particularly during heavy rainy periods.

The proposed site will sit above the Lower Greensand Group of strata and one of our principle aquifers of the region for potable water. These are poorly cemented sands which is why they are capable of holding water so effectively acting like a sponge. This means that they are highly susceptible to the slightest risk of spilled or leaking contaminants from the surface and at higher risk below ground during the borehole preparation process where even the smallest amounts of toxic spillage or leaking will cause contamination of the supply. We have concerns that the protective casings through the aquifer may not go deep enough to ensure no risk and that even prediction of low or minimal risk of contamination is not acceptable.

The applicant admits greenhouse emission pollution from the site over the 86 week period of between 10,000 to 15,000 tonnes of CO<sub>2</sub> equivalent. This equates to 1,000 to 1,500 UK households' annual emissions and we do not consider this to be acceptable given the Council's determination to reduce rather than add additional carbon emissions over the next 10 years.

There does not appear to be data including emissions of Nitrogen Oxide and Carbon Monoxide from the additional HGV required to service the site over the period. Please see comments on the number of journeys below.

### **Traffic**

The applicant claims that the "DfT threshold for assessment of 15 peak-hour movements (in and out), of the development would have a negligible impact on the operation of the local highway network. Therefore, the proposals are considered to be in accordance with the NPPF, which

states that “**development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe**”

I defer to the Island Road’s Consultee statement identifying 7 points for refusal for this statement. However it should also be highlighted that the calculation of HGV journeys by the applicant in this planning application as being up to 4,950 two way HGV journeys (9,990 single journeys) for the 86 week period, does differ considerably from the Movements Schedule published to communities in December 2019 which indicates up to 6,420 two way journeys (12,840 HGV trips) for the same 86 week period. We recommend that this should therefore be clarified by the applicant given that an additional 2,850 HGV trips makes a considerably greater impact on movements and calculations of emissions of greenhouse gases.

### **Economic & Employment Considerations**

The applicant admits that the majority of personnel required for the site will be imported from the mainland to be hosted in local hostleries for the duration of the initial phases of the application and that beyond this time the site will be monitored remotely.

The applicant also has suggested in discussions with local parish councillors, that, for a temporary period some manual workers for site construction and security guards (around 12 ) may be employed with some local HGV drivers and businesses supplying plant and materials.

Beyond this temporary period there are few long-term employment prospects for IOW residents.

We propose that losses incurred from the impacts of this development on infrastructure and services will outweigh income from business rates, taxes, local employment and hostleries and that the 2% promised benefit to the community from the applicant’s profits and sales of oil before tax, would not materialise unless there is a company profit. There is no evidence or indication at the time of this application that any profit will be forthcoming in the foreseeable future of this development.

### **UK Energy Security and Emissions from Overseas Importation.**

Documentation from the planning officers state that "the council recognised the requirement of national planning policy to plan proactively for hydrocarbon exploration and testing". However this requirement has been removed from the National Planning Policy Framework as of June 2019.

The applicant’s proposed activity does not reflect the Island Strategic Plan which establishes a clear projected expectation to promote green energy and reduce its carbon footprint. Onshore oil drilling is unquestionably incompatible with this objective and should be rejected on these grounds alone. It is clear that to promote alternative energies while simultaneously permitting high polluting industries such as oil extraction is a contradiction in terms.

We are already supporting local sustainable energy production for indigenous UK supply through biogas and solar energy projects which currently produce more energy than it is possible to transfer to the national grid because of limited infrastructure, storage and transfer systems of excess energy to the mainland.

It would be more beneficial to both the economy and local IOW energy security to fund appropriate improved infrastructure and to promote increases in local alternative energy supplies and invest in storage of excess to be used on the Island.

The applicant claims that indigenous supplies of UK oil are required for UK energy security to avoid the importation of supplies from existing reservoirs from abroad, and states the requirement highlighted in the NPPF should be weighted to secure a positive outcome for applications for UK onshore oil extraction.

Additionally they say this will assist in reducing our carbon emissions to zero by 2050 by reducing transportation emissions.

However they fail to acknowledge that the UK still exports almost as much UK Brent Crude to Europe and China and Hong Kong as it imports poorer quality fuels from other countries.

National figures updated to 2018 show – 52,430,000 tonnes oil imported and 44,615,000 tonnes Brent Crude Exported. Exportation in addition to Importation does not "reduce transportation emissions"

In fact the current Government is hoping to develop further opportunities to export increasing amounts of oil to China in post Brexit negotiations.

Therefore this argument by the applicant in support of approval due to these NPPF requirements and emissions reduction is nonsensical and should be disregarded in this application. IOW extracted oil will need exporting and then will not necessarily stay in the UK.

We therefore respectfully ask that these objections and statements are taken into consideration to REJECT this application.