

Keep Shepherdswell Well

Address to Dover District Council Scrutiny committee on the subject of Fracking,

November 11, 2013

Introduction: My name is Pamela Mudge-Wood. I have lived in East Kent for 30 years; 25 years in Canterbury and 5 years in Shepherdswell. Originally from America, I am married to Kevin Mudge-Wood, the son of a Kent miner, raised in Snowdown; he is an Old Pharosian and has worked for 20 years as a production editor on Kent's local newspapers. With a PGCE from Christ Church University, I have taught music and English in Kent schools since 1993.

I say all this to show that, contrary to the popular image of anti-fracking campaigners as rent-a-mob ideologues drifting from benefit offices to protest camps, neither I nor my fellow Keep Shepherdswell Well colleagues speaking tonight are 'professional protesters'. We are hard-working, tax-paying residents of a village and district directly threatened by the government-backed encroachment of a polluting industrial practice upon and underneath our locality.

We are standing up alongside our neighbours to protect ourselves from the deteriorating effects on the landscape, local economy, public health, social cohesion and political integrity that fracking and related drilling practices have brought to many parts of the US over the past decade, including the area where I grew up, on the banks of the Delaware River in the Catskill Mountains; on the border between New York and Pennsylvania; above the Marcellus Shale.

I first encountered the gas drilling industry on an extended visit to my parents in 2007, as I witnessed a gas pipeline cutting 100 foot-wide scars along hundreds of miles of the gently forested and rural landscape of the Catskill foothills. This was before I had ever heard of fracking, or coal bed methane extraction, or coal gasification, or any of the other extreme forms of fossil fuel extraction currently being sold to the UK public as the magic formula that has brought Americans cheaper gas bills, skilled jobs, and clean, safe energy.

Argument:

Having watched the development of the fracking boom in my home area from the safe distance across the Atlantic over the past 5 years, I have become thoroughly convinced that all of these

unconventional extraction practices are to be opposed on principle, not just as a localised or NIMBY issue, for the following reasons:

- They have the potential to cause air and water pollution with catastrophic consequences, and cannot be made entirely risk-free even if regulation and monitoring of industrial practices are of the highest standard. All cement casing deteriorate eventually.
- The US government has reduced standards of monitoring and regulation by excluding these practices from the jurisdiction of federal environmental protection legislation, (the Halliburton loophole) thus leaving the states and local authorities to take up the responsibility for regulating, monitoring and dealing with accidents; and
- The UK government is giving every indication that it intends to follow the same agenda:
 - by cutting Environment Agency budgets further and faster than expected,
 - by putting political pressure on local authorities to permit drilling applications,
 - by pledging de-regulation, while at the same time promising that accidents that have happened abroad could never happen in our highly regulated industrial scenario; and
 - by appointing gas industry moguls to cabinet posts, including Lord John Browne, former CEO of BP, who while in office has made extensive use of his power to appoint non-executive members of his choice to government departments concerned with regulating the oil and gas industry. (1)

We have heard much eyewash from central government and the energy companies about how utterly risk-free these drilling practices are. Only this Saturday, Business and Energy minister Michael Fallon was again assuring us in the Daily Telegraph (2) that the Water UK study into the dangers of fracking, as yet unpublished, **will show** that fracking is “largely safe” (but it’s the small, unsafe bit we’re concerned about!) and **will show** that there is “no risk” of contamination of water supplies. We must ask (a) how can he know what the report will say before it is published, and (b) how can we believe that anything can be as risk-free as they repeatedly claim, especially when (c) our government is working so hard to increase the risk through de-regulation; as Fallon boasts later in the article, “ministers have reduced the regulatory barriers to fracking, clearing the way for the industry to spread across the country.”

This relentlessly positive slant on the risk-free benefits of fracking strains the credulity of the famously sceptical British public and so weakens the government's Dash for Gas.

Conflict of interest in the highest offices of state, rampant de-regulation, exemption from environmental protection legislation, dismissal of risk, denial of alleged harm, disparagement of dissent and legal gagging of dissenters; these are all hallmarks of the political climate which has allowed fracking to spread unrestricted across rural America over the past decade. This laissez-faire approach enabled fracking companies to go from a small handful of vertical test bores in Western Pennsylvania in 2007 to over 3,000 wells, about half of which are now horizontal fracking wells, spreading like a fungus across the once-rural landscape of Northwestern Pennsylvania. (3)

In response to the repeated industry claim that there is no documented evidence of fracking ever causing harm, may I direct you to the Pennsylvania Alliance for Clean Water and Air's "List of the Harmed". (4) an online list of now approaching 1800 cases of harm to individuals' health and homes caused by gas drilling, ranging from nosebleeds and cracks in walls to cancer and sudden death. Each entry includes direct online links to media reports, photos and films of the people concerned; I have included one such media report here (5). So how does the industry maintain this stance of blanket denial of harm? Proof of contamination is hidden from public view by the industry-wide practice of settling out of court and imposing non-disclosure agreements, once the harmed individuals have themselves paid for environmental testing to prove contamination. Big oil and gas companies have big pockets to pay for big lawyers, and individuals impoverished by legal fees, deteriorating health and plummeting property values eventually must give up the fight and agree to remain silent, or face further penury, often alongside public disparagement. (6) For further development and evidence of the political climate in which fracking has flourished in the US, please refer to Sourcewatch.Org (7) <http://www.sourcewatch.org/index.php/Fracking> Also watch Gasland I and II <http://gaslandmovie.co.uk/>

Conclusion:

We are aware that there is a public order concern in East Kent around the anti-fracking movement, and my aim here has been to inform you of the political paradigm under which the fracking debate has developed and is developing. What is happening in East Kent has

happened before in many other places in the US. EKAF and Keep Shepherds Well have not brought the threat of public protest to our area; no more than the residents of Balcombe started direct action on a whim, to follow some environmental bandwagon in August. By allowing Cuadrilla unchecked permission to drill in their village, over the heads and literally under the feet of the residents, Balcombe Parish Council and East Sussex County Council themselves brought the prospect of public protest to their doorstep. And without the concerted intervention on our own behalf of local residents of Shepherds Well and East Kent, Coastal Oil and Gas were undoubtedly hoping to push their borehole plans through unnoticed and unopposed as well.

We are grateful that the Parish Councils of the four villages most directly affected have voted over-whelmingly to reject the test bore applications, we are grateful that Dover District Council has undertaken the task of scrutinising the potential effects of fracking and related practices on our locality, and we are very glad that as a result of public opposition through the democratic process and material concerns raised by the Environment Agency about the safety of East Kent's water supply, we have, for now, escaped the fate of Balcombe as well as those of Dimock, PA, Pavillion, WY and Dish TX. (see Gasland I and II) We should be wary though, of Michael Fallon's warning/threat in The Telegraph this weekend: "Households right across the South should prepare for gas fracking to begin in their areas, a senior minister warns." (2)

(1) <http://frack-off.org.uk/the-fracking-czar-lord-john-browne/>

(2) <http://www.telegraph.co.uk/earth/energy/fracking/10437394/Fracking-is-safe...-and-its-coming-soon.html>

(3) www.eia.gov/todayinenergy/detail.cfm?id+6390

(4) <http://www.pennsylvaniaallianceforcleanwaterandair.wordpress.com/the-list/>

(5)

[http://www.alternet.org/story/150527/%22they are afraid their house could blow up%22 %3A meet the families whose lives have been ruined by gas drilling %5Bphotos by award-winning photographer nina berman%5D](http://www.alternet.org/story/150527/%22they%20are%20afraid%20their%20house%20could%20blow%20up%22%3A%20meet%20the%20families%20whose%20lives%20have%20been%20ruined%20by%20gas%20drilling%5Bphotos%20by%20award-winning%20photographer%20nina%20berman%5D)

(6) Cycle of fracking denial, Earthworks, handout

(7) <http://www.sourcewatch.org/index.php/Fracking>

(8) <http://gaslandmovie.co.uk/>

Keep Shepherds Well

www.KeepShepherdsWell.org

c/o 42 Saint Andrews Gardens
Shepherds Well
Dover, CT 15 7LP

10 November 2013

Mr M Clifton
Planning Applications Unit
Invicta House
Maidstone
ME14 1XX

Dear Mr Clifton

**Planning Application DOV/13/0074 (KCC/DO/0218/2013)
Land off un-named road, South West of Puckland Wood, Shepherds Well, CT15 7PZ**

The organisers of 'Keep Shepherds Well', a campaign group established by Shepherds Well residents, wish to object to the above planning application.

The Kent Minerals Plan states in OG2 that the Planning Authority has to be satisfied that the proposed site has been selected to "minimise its environmental and natural resource impact". OG8 goes on to state that Planning Authority "will be required to be satisfied that the earth sciences and ecological interests of the site and its surroundings ... have been established". The National Planning Policy Framework para 109 states that 'the planning system should contribute to the natural and local environment' by 'preventing new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air water or noise pollution'.

We do not see how KCC can possibly consider this application as meeting these requirements.

We have carefully read the Environment Agency's advice (ref. KT/2013/117018/01-L01) and the 17 items of further information it requires from the applicant. We have also noted the concerns of the Kent Wildlife Trust's letter (Ref 315420/KN) and the objections by Shepherds Well and Coldred Parish Council. We add our support to the points made by these organisations.

Our concerns cover the environment, including the impact on the aquifer and wildlife, access to the site, noise pollution and impact on general amenities. We are also concerned at the general lack of 'knowledge and awareness' about potential risks displayed in the application by Coastal Oil and Gas (COG).

1. The aquifer and our water supply

The application makes no attempt to address concerns about the effect on the environment, especially potential contamination of the chalk aquifer. Its failure even to acknowledge the fact that Shepherds Well is located in a protected area of the aquifer suggests that COG is unaware of the issues involved. It would be very difficult if not impossible to put in place safeguards to guarantee protection of the aquifer but the applicants show little understanding that this is even

necessary. As the Environment Agency (EA) points out, groundwater flow can be rapid and reach the aquifer, boreholes and surface water very quickly.

COG gives no details about how it would capture, store or remove contaminated water from the drilling process. It does not detail what chemicals would be used and whether they are appropriate to this onshore area.

Not only will waste water contain chemical contaminants, it may also be affected by the presence of Radon and arrangements for disposal are not set out in the application. The Indicative Atlas of Radon in England and Wales (p. 15) identifies the area in which the proposed borehole is located as having 5 to 10 per cent of dwellings 'at or above the action level'.

The area is also one of seismic activity. This issue has also not been addressed by COG. According to the British Geographical Survey, the April 2007 activity at Folkestone was measured at an intensity of 5 on European macroseismic scale. In April and May 2011, tremors in Lancashire measured at 1 and 2.3 on the macroseismic scale. They nevertheless resulted in an annulus becoming twisted on the Caudrilla site. An earthquake in East Kent, whether occurring naturally or induced could rupture the borehole linings and seals, potentially contaminating the aquifer. A review by independent experts, *Preese Hall Shale Gas Fracturing Review & Recommendations for Induced Seismic Mitigation*, stated that the seismic activity in Blackpool 'was induced by the hydraulic fracture treatment'. Noting the lack of research into the industry, the authors were not convinced by Caudrilla's projected low probability of further earthquakes during future treatments.

The application would involve large amounts of water but this has not been quantified, nor are details given of how it would be sourced.

2. General environment/wildlife

The aquifer also feeds into rivers and other important features of the landscape and ecology which may be affected by contamination.

The site is adjacent to Puckland Wood, which, according to the Kent Landscape Information System, is the largest wood designated as ancient woodland in Shepherdsweil and Coldred Parish and Dover District and an acknowledged Local Wildlife Site (LWS – DO36). Westcourt Lane also has wayside nature reserves managed by Kent Wildlife Trust. The proposed site is two kilometres from the Lydden National Nature Reserve (NNR), which is designated as a Site of Special Scientific Interest. The applicant sees fit to acknowledge 'the proximity of the racing circuit used by cars and motorbikes' but fails to acknowledge any of the above.

COG's 'ecological walkover survey' attached to the application was carried out in February. It states that 'no badgers, bats or barn owls were present'. Yet villagers often see badgers at night in the road next to the site. Bats and owls also hunt the area at night, especially the leafed tunnel that has formed over the road that will be the access to the site. (See below). The woods and adjacent fields are rich in birds, such as buzzards, kestrels, owls, pheasants, partridge and song birds.

We are very concerned to protect this habitat and wild life from noise and light pollution which will result from the 24hr drilling operations. We are alarmed that Coastal Oil and Gas fail to recognise the local ecology and give no detail about how it would be protected.

3. Traffic and access

The access road to the proposed site is single track and unsuitable for drilling rig and associated equipment access.

The field entrance COG intends to use will not allow access to plant and heavy vehicles without destroying some of the natural hedgerows and trees. A significant length of the lane intended

as access is a natural tunnel of trees, which adds to the natural beauty of the area. The movement of plant up and down this road will destroy this.

Emergency access to and from the proposed site is severely restricted by the closure of the central reserve at the Barfreston junction on the A2. Emergency vehicles coming from the Dover direction have to travel to the Wingham junction before retracing their journey. Vehicles leaving the site travelling towards Canterbury would have to travel to the Shepherdswell junction before taking the Canterbury direction.

The lanes through the village are not suitable for site traffic and should not be used in any way. There is already considerable concern and inconvenience within the village because of the use of these lanes by HGVs.

4. Noise and pollution

The noise level assessment included in the application was based and modelled on out of date information. The same criteria were used to assess the noise levels at the test drilling site in Balcombe, and decibel levels were frequently exceeded, leading to a suspension of drilling. The noise report does not address the problem of continuous low frequency noise, which can be equally disruptive to residents. Low noise also poses a risk to public health (see Colin H. Hansen (ed), *The Effects of Low-Frequency Noise and Vibration on People*, 2007).

COG assumes that the risk of vibration is low because it will be drilling through soft materials. However, chalk is not considered to be in this category and therefore the company's reassurances are based on faulty information.

The application does not address emissions from the site; both for construction and methane. It does not mention whether any methane flaring will take place at the exploratory stage.

The prevailing wind in our area is from the South West and will carry noise to the village and cause noxious emissions to be deposited over the village, which lies in a valley and on a ridge to the North East of the site. We would have expected the Health Protection Agency to be consulted concerning the likely impact of this application on the health of local residents. We would also have expected a review of existing research and the commissioning of further studies where there was a lack of relevant knowledge. Research findings should be made available to residents as part of the consultation process.

5. General amenities and heritage

The site threatens to severely damage the tourist industry, which is worth an estimated £243 million to the Dover and District economy. Plans to regenerate Dover town centre and areas of the sea front, and improved marketing of the area, aim to attract more tourists. But they will be jeopardised if the environment is trashed by a polluting industry.

We are concerned that the responsibility for land restoration is unclear. The details given in application are insufficient. Companies in this industry have a reputation for attempting to avoid their responsibilities. For example, Cuadrilla is involved in a legal battle to avoid cleaning up post-operation pollution following open cast mining in Scotland.

Two national recreational routes go through Shepherdswell and both are threatened by this development. The first is National Cycle Route 16, which has attracted a marked increase in use by cyclists since last year's Olympics. National Cycle Routes are defined as 'a series of safe, traffic-free lanes and quiet on-road routes' (Sustrans). Yet the applicant proposes to use a half-mile section of Cycle Route 16 as an access route for its Guston site. The presence of heavy site traffic threatens the amenity value and safety of this route.

The North Downs Way also passes through the centre of Shepherdswell and is popular with recreational walkers and tourists. The applicant's proposed access route to the Guston site dissects the North Downs Way.

The applicant fails to acknowledge the existence of these two amenities. They are important for local people and for those from wider afield, contribute to the local economy and should be protected.

The proposed site would also undermine the local footpaths neighbouring the site, which are used by local people.

6. Reporting and regulation

It is documented that COG had discussions with EA, KCC and other interested parties before submitting their application. Yet the EA comments that COG has submitted completely inadequate information. The company, says the EA, shows lack of 'awareness and knowledge' of the risks it is meant to address. We would ask how much confidence this gives KCC that this company is managed and equipped in a way that can safely monitor the environmental and health risk of its activities should the application be granted.

We are concerned about the whole issue of monitoring and self regulation in relation to this industry. Regulations are not 'red tape' but in place to protect our drinking water, safety, health, quality of life and our local and general environment.

We are very concerned that the EA generally, because of workloads and staffing issues, relies on operators to self-report problems. The EA is now facing staff cuts of 15% by October 2014. We tremble at the prospect of COG self-reporting given the inadequacy of their 'awareness and knowledge'. We wonder how the EA with its wide ranging responsibilities and fewer staff are going to monitor them. Without proper monitoring and inspections, regulations are insufficient protection.

7. Consultation

There was no discussion between COG and the local community prior to the submission of the planning application. The presence of the company's geologist at the first Parish Council meeting to discuss the application was hardly reassuring. He appeared unaware of environmental or social issues which might apply and was also unforthcoming on geological details in response to concerns that were raised by residents.

Considering the controversial nature of the planning application and the potential impact on residents' health and quality of life, we would anticipate that, should COG supply further information in relation to its application, residents will be informed at the earliest opportunity and given appropriate and adequate time to research and consider a response.

Yours sincerely,

John Bulaitis
Claudine Nutley
Eddie Higham
Dick Martin
Paul Beamont
Julie Williams
Alan Williams
Steve Gaymer
Linda M Gaymer
Pamela Mudge-Wood
Margaret Creear

(signatures over page)