

**Notes for the Parish Council**  
**Planning Application DOV/13/0074 (KCC/DO/0218/2013)**

The Planning Application does not involve either fracking or horizontal drilling, and therefore should stand alone as an application to sink an exploratory borehole. However care should be taken that should permission be given this will not automatically give the right to extend the consent for further investigation including **fracking or horizontal drilling**.

Therefore consideration on this planning application should only consider those issues concerning an exploratory borehole.

- The Kent Minerals Plan states in OG2 the Planning Authority has to be satisfied that the proposed site has been selected to “**minimise its environmental and natural resource impact**”
- The Kent Minerals Plan goes on to state in OG8 that the Planning Authority “**will be required to be satisfied that the earth sciences and ecological interests of the site and its surroundings ....have been established**”

These criteria have not been met by this application as it does not attempt to minimise the adverse effect on the environment and amenity issues.

**Therefore, this application should be refused on the following grounds:-**

- The site is in an area where protection to the chalk aquifer is enshrined in the Dover District Council’s planning policy. This area is an extremely important water resource in an area of stressed water supply and any pollution would have a serious effect on the residents of Shepherdsweil and East Kent.

Whatever safeguards are put into place would not guarantee 100% the protection of this resource.

The detail given in the application is woefully short of detail as to the protection envisaged.

There is no reference regarding the acceptance by the Water Authorities (Affinity and Southern South East Water) of the works to maintain the integrity of the aquifers following a borehole drilled through them.

The expected section does not detail the Wealden clay that lies between the chalk and Jurassic beds and effectively maintains the aquifer, thus the application gives no details as how the various tubes are sealed at this level.

There are insufficient details of the hardstanding to ensure no contamination will occur.

There are many known cases of the well heads of the proposed design cracking causing loss of fluid into the ground and thereby causing contamination.

- The site is adjacent to an area of Outstanding Natural Beauty
- The site abuts Puckland wood, the largest wood designated as ancient woodland in Shepherdswell and Coldred Parish and Dover District.

The ecology report attached to the application was carried out in February and stated that there was no evidence of badgers in the area or birds. This is blatantly wrong.

Badgers are often seen at night in the road adjacent to the site, in fact one was recently a victim of road kill adjacent to the proposed site.

The woods and adjacent fields are rich in birds, such as Buzzards, Kestrels, Owls, Pheasants, Partridge and song birds.

Bats and Owls hunt the area at night especially the natural leafed tunnel that has formed over the road that will be the access to the site.

**The application does not even acknowledge that the adjacent woodland is Ancient Woodland, never mind demonstrated sufficient mitigation to protect this habitat from noise and light pollution which will result from the 24hr drilling operations.**

- Roads to the north and east of the proposed site are single track and unsuitable for drilling rig and associated equipment access.

The existing field entrance the applicant intends to use is angled to the north east and will not, in its current form, allow access from the A2 direction for the proposed plant without destroying some of the natural hedgerows and trees. Further a good length of the lane intended as access is a natural tunnel of trees, which adds to the natural beauty of the area (see the point above). The movement of plant up and down this road will destroy this.

- Emergency access to the proposed site is severely restricted by the closure of the central reserve at the Barfreston junction on the A2. This will require emergency vehicles to either travel to the Wingham junction to access the site from Dover or to the traffic light junction at the Shepherdswell junction in order to return in the Canterbury direction. The lanes through the village are not suitable and should not be used in any way.

- There has been no discussion between the applicant and the local community prior to the submission of the planning application, which is contrary to the guidance for onshore oil and gas issued by DCLG.

- There appears to be no advice from the HSE or the EA on the issues of well design and integrity, operation of surface equipment to prevent

contamination, flaring and venting, disposal of water, decommissioning and abandonment, before the application, all in accordance with the DCLG guidance. KCC need to **satisfy themselves** that all these issues can be adequately addressed by taking advice from these regulatory authorities before they grant planning consent.

- The noise level assessment that was included in the application was based and modelled on out of date information. The same criteria were used to assess the noise levels at Balcombe, and these levels were frequently exceeded. The prevailing wind will further exacerbate the situation with the village lying in a valley WSW of the proposed site. The noise report does not address low continuous noise which can equally disruptive to residents.
- The application has not addressed emissions from the site; both for construction and methane (if they do in fact find any), this prevailing wind will cause all noxious emissions to be deposited over the village.
- The area is one of seismic activity and this has not been addressed by the applicant. There are numerous faults within the area and any movement of these could easily rupture the borehole linings and seals, thereby causing potential contamination of the Aquifer.
- The British Research Establishment report on Radon Gas, No211, identifies the area in which the proposed borehole is located as having 5-10% of dwellings where action against radon gas emissions has been required. There is no mention in the Applicant's documents as to what precautions will be taken to deal with possibility of encountering radon gas.
- The applicant has not demonstrated that the site chosen has no alternative for the proposed borehole.

Alternative sites within the vicinity may exist where disruption to the countryside caused by drilling operations could be minimised, **although the integrity of the aquifers would still remain suspect**. These should have been investigated by the Applicant, in order to satisfy the requirements of the Kent Minerals Plan and the provisions of policy OG2 in particular.

Geoff Peagram/Peter Stebbings

