

ES/3379 – Application by Island Gas for two exploratory boreholes at Springs Road, Misson – Regulation 22 Response

Additional objection by Nottingham Friends of the Earth, further to our previous objection

We wish to add to our previous objection to this proposal.

IGas has failed to adequately respond to a number of issues on which further information was requested and failed to demonstrate compliance with a number of planning policies. In particular:

- (1) IGas has failed to properly carry out the sequential test for flood risk to establish that no site in Flood Zones 1 and 2 would be possible before considering a site in Flood Zone 3.
- (2) IGas has failed to provide the detailed 3-D seismic data requested which would have allowed independent geologists (such as Professor David Smythe) to assess their interpretation of the geology in relation to site selection.
- (3) IGas has failed to consider the potential impact of 24-7 lighting on breeding birds – which could be significant, particularly for owls but also for other birds. It is noted that the north west corner of the Misson Carr SSSI (close to the proposed drilling site) is most significant for long-eared owls (Technical Note C, para 4.6) but there does not seem to be any assessment of the impact of continuous lighting. (There is some consideration of impact of lighting on bats, but only after arguing that there won't be any bats nearby.)
- (4) Although it seems that no breeding bird survey has been carried out, IGas has acknowledged data provided by Notts Wildlife Trust. IGas' figures for anticipated noise levels, both during construction and during drilling, demonstrate that there will be adverse impacts on sensitive species in the SSSI. We support the conclusions of Notts Wildlife Trust that even with maximum mitigation there is a high likelihood of reduced breeding success for a number of sensitive species. This would be contrary to NPPF para 118, as IGas has failed to show the benefits of this proposal outweigh the impacts on a SSSI. IGas' proposal to limit operational noise to 55dB LAeq and construction noise to 80dB LAmax at the SSSI boundary is clearly inadequate to protect the SSSI.
- (5) IGas has accepted that modelling for nitrogen deposition is appropriate. Their claim that it is 'unduly precautionary' should be rejected. The conclusion that this is likely to have a significant detrimental effect on vegetation in the SSSI should stand. IGas' offer to review mitigation after selecting drill rig and generators is clearly inadequate.
- (6) IGas has failed to provide the data requested showing how it has weighted different constraints in the sites selection process, in particular how it has

weighted impact on agricultural land, residential properties, listed buildings and wildlife sites, and how it has chosen a site which

- is in Flood Zone 3;
- is within 130m of a SSSI;
- will cause excessive noise affecting breeding birds;
- will cause 24-7 light pollution affecting long-eared owls and other species;
- will cause excessive nitrogen deposition affecting sensitive vegetation.

For all these reasons the proposed development should be refused.

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