

Application Ref No: ES/3379 by Island Gas: Exploratory Drilling at Misson Springs, Bassetlaw. Further Comments by Frack-Free Notts

We refer to information submitted by IGas in April 2016 in response to a request by the planning authority under Regulation 22 (EIA 2011). We view this information as partly incomplete and partly misleading in its interpretation, and thus we maintain our objections to the application as set out in our previous submission in December 2015.

Flood Risk (Sequential Test)

We maintain that there is still no proper explanation of why it is not possible to drill in Flood Zone 2 rather than Flood Zone 3 (which has a higher probability of flooding), and hence that the sequential test has not been properly applied. Instead various reasons for the location of the site including geological survey information, no agricultural land disturbance and the benefit of an existing access have been put forward.

IGas has failed to show that there are no “reasonably available sites appropriate for the proposed development” in Flood Zones 1 and 2 and we doubt if both the Environment Agency and the County Council will be satisfied that the Strategic Flood Risk Assessment has explored a sufficiently wide area of search in and beyond these zones. (Ref: Para 101 of NPPF 2012). In addition, the proximity of wildlife does not appear to have been taken into account nor has the likelihood that the proposed drilling will reduce the water level in surrounding drains and in the Misson Carr SSSI.

Geological issues

Some additional detail from the 3D seismic testing has been given, but there is insufficient data to allow the local authority (or independent experts) to fully assess IGas’s interpretation of the geological structure. [Ref: Prof Smythe’s report which found 27 substantive errors, omissions and misleading statements in the information accompanying the IGas application].

Proximity to the SSSI

We are still unclear as to how this site has been selected given its location in Flood Zone 3 and its proximity to the SSSI. We refer to the principles for local planning authorities when determining planning applications affecting SSSIs, as set out in the NPPF at paragraph 118. Regarding potential adverse effects, it states: “...an exception should only be made where the

benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest;" We maintain that there are limited benefits (certainly minimal to the local economy- see previous submission) and that, if such a testing site is found to be justified in North Bassetlaw, then a less sensitive area should be chosen for it. Certainly at Misson there is acknowledged harm to the SSSI in respect of nitrogen deposition, light pollution and noise impact, which in our view outweigh any discernible benefits.

A key adverse effect would appear to be upon breeding birds. 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 drilling phases, demonstrate that there will be adverse impacts on sensitive species in the SSSI. We therefore echo the views of the Notts Wildlife Trust that, even with maximum mitigation, there is a high likelihood of reduced breeding success for a number of sensitive species. Furthermore, IGas gives little consideration to the impact of 24/7 lighting on birds (breeding or otherwise), despite admitting that the most important species is the long-eared owl.

There is a somewhat dismissive attitude in the report to the modelling of nitrogen deposition which is described as "unduly precautionary". We would query the contention that plant-life on the well pad side of the SSSI is more nitrogen tolerant than that elsewhere, and that the whole issue can be covered by a planning condition.

### Site Selection Overall

In conclusion, we suggest that the site selection process still appears to be flawed, particularly as the choice of site is not consistent with the various constraints identified in the Reg 22 submission. For example, it appears that the presence of grade 2 agricultural land and of a readymade tarmacked access road from the highway, may have been given greater weight than very close proximity to a SSSI (130m). So, in the absence of any information in paras 4.2.13-15 (or elsewhere) on how the different constraints were weighted, it is difficult to conclude that this process was undertaken with any proper rigour.

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### Landscape and Visual Impact

We note that IGas has provided photomontages as requested by County Council officers, but we disagree with its conclusions that:

“...there are no structures or buildings of vertical significance within the study area with which there may be a cumulative impact”. As established in our previous submission (paras 25-27), the relative flatness of the landscape will allow the tallest drilling rig to be visible (esp. at night) over a wide area stretching as far as Gainsborough and Retford; we also identified that there is a specific cumulative impact on a sight line between Grade I listed churches at Misterton and Finningley. Consequently we recommend that the study area should be extended and that further detailed visual impact surveys should be carried out accordingly.

*We commend all these comments to members of the Planning and Licencing Committee and urge officers to seek further information in order to clarify the scale of the risks to community health and amenity of this proposed development.*

PJ/NG/ 17/5/2016 Peter Jaggar on behalf of Frack-Free Notts.