Written evidence submitted by the Frack Free Eqs (RUT0045)

Frack Free Eqs (FFEQS) are responding to this enquiry because we are very concerned about the damaging effect that fracking would have on rural tourism in our area, and also in the rest of the UK. We are a group of concerned residents who live and work in an area that is currently threatened by fracking, specifically PEDL areas ST04, ST14 and ST24.

Notwithstanding the growing evidence that fracking is hazardous to the health of communities living near affected areas, we are convinced that fracking, if allowed, will have a negative impact on our rural tourist economy.

We are opposed to all unconventional oil and gas developments (UOGD), both onshore and offshore, and we are particularly concerned about developments near to and under protected areas, such as National Parks, Areas of Outstanding Natural Beauty, and environmental designations, such as Sites of Special Scientific Interest and RAMSAR sites.

In the latest edition of the Department of Energy and Climate Change’s long-running public attitudes tracker (April 2016) just 19% of people supported exploration for shale gas, down from a high of 29% two years ago. The percentage against has risen to a new high of 31%, while the proportion neither for or against was 46%. Undoubtedly opposition to fracking will continue to grow, however it seems almost inevitable that the government will push ahead with their plans to develop this industry in the UK. It is with this in mind that Frack Free Eqs are responding to this consultation because, whilst we are opposed the proliferation of this industry, we must engage with the authorities involved in order to secure improvements that will limit the negative consequences as far as possible.

Defra’s draft Shale Gas Rural Economy Impacts Paper

We have read Defra’s own report which concluded that fracking would negatively impact the rural tourist sector. This paper stated: “Shale gas may transform a previously pristine and quiet natural region, bringing increased industrialisation. As a result, rural economy businesses that rely on clean air, land, water and/or a tranquil environment may suffer losses from this change, such as agriculture, tourism, organic farming, hunting, fishing and outdoor recreation.” This paper also went on to say that fracking "may reduce the number of visitors and tourists to the rural area, with an associated reduction in spend in the local tourism economy." The first time this report was published it was redacted 63 times, including sections on house prices, economic impacts, social services, local services and the executive summary.

FFEQS are concerned that Defra never completed a comprehensive report on the effect of fracking on the rural economy – which of course would include the rural tourism sector, the subject of this enquiry.

Executive Summary

FFEQS is of the view that the EFRA inquiry must include in their considerations:
• The effect of UOGD on rural tourism

• The need to ensure that an appropriate mechanism is in place that requires the DBEIS/OGA, Mineral Planning Authorities, the Health and Safety Executive and the Environment Agency to establish:
  o The value of the tourism sector to the economy of affected region.
  o The ways in which unconventional gas and oil development will impact the tourism economy, now and into the future.
  o Policies or strategies that might help to mitigate those negative impacts.

• Require that planning authorities must treat as a material consideration the overall effect of the application, throughout the lifetime of the development, on meeting the Government’s commitment to reduce emissions by 80% by 2050.

• Ensure that the Government ratifies the Agreement signed at the Paris Climate Conference in December 2015, to be implemented in 2020, to keep global increases in temperature well below 2 °C.

• Support the view that there must be a unified and adequate regulatory regime in place prior to any further development of the unconventional oil and gas industry in the UK. Regulation is currently inadequate and relies on a self-serving industry to self-report to diverse independent regulators (the Health and Safety Executive, the Environment Agency and the Oil and Gas Authority). A single independent regulatory authority must administer regulation.

FFEQS concerns are all related to the EFRAs inquiry terms of reference under the headings ‘Planning and Regulation’, and ‘Local Environment and Character’. FFEQS urge the inquiry to ensure that:

• All planning applications relating to UOGD must be subject to a full Environmental Impact Assessment (EIA) and Environmental Risk Assessment (ERA). FFEQS believe this is the only way that the relevant authorities can adequately assess whether or not a site is appropriate for UOGD and assist in identify what impacts can be avoided, reduced or mitigated.

• Exploration stages for unconventional resources, some of which even involve fracking, should not be allowed to avoid the requirement for an EIA. Apparently this can currently be avoided by limiting the surface area of the development to under 1 Ha. We are concerned because it seems that many of the proposed sites to date cover an area of 0.99 Ha.

• Funding should be made available to the EA and MPAs to outsource independent specialist advice. Environment Agency and Council budgets are under greater pressure then ever and
they are likely to be processing increasing numbers of UOGD applications over the next few years. We are concerned that they do not have the necessary expertise to interpret geophysical survey data. The most hard-pressed Councils are likely to rely entirely on what the applicants choose to present.

- Operators should not be allowed to drip-feed planning applications by withholding their true intentions for the development site. FFEQS is concerned that this is a tactic currently employed some operators, whereby they give the appearance of not being interested in fracking operations (as defined within the Infrastructure Act). This could allow them to leapfrog consultative processes and/or restrictions which would otherwise be requirements placed on the acceptance of the application if they had made their true intentions clear with the first application. Any planning application that involves the injection of fluids at high pressure for the purpose of stimulating hydrocarbon recovery, for whatever purpose, should be subjected to full rigors of planning process, regardless of whether the process employed by the operator satisfies the Government’s definition of fracking within the amended Infrastructure Act, or whether it is for test flow rate or full production.

- It should be mandated that all applications to drill are supported by 3D seismic survey data and that surveys are carried out using the most up-to-date standard technology – currently a fibre-optic array.

- All UOGDs planning applications must consider the impact on the amenity value of the countryside and local rural character that must be protected and enhanced by the development, both during its lifetime and following abandonment. It is vitally important that the development does not impact the visual amenity to the surrounding area.

- Parts of Exmoor and the Quantocks enjoy Dark Sky status which must be protected. All applications must specify the use of best practices and technology to minimise light pollution. Winter night time operations should be curtailed between 22.00-04.00 [http://www.somersetcountygazette.co.uk/news/14554295.How_dark_is_the_sky_over_your_home__Check_the_map/](http://www.somersetcountygazette.co.uk/news/14554295.How_dark_is_the_sky_over_your_home__Check_the_map/)

- All UOGDs are likely to have a detrimental impact on tranquillity. The EQS area is famous for its tranquillity and rural tourism is reliant upon the perception that the area remains so. Planning approval, if given, should be subject to a condition requiring acceptable noise reduction standards that are consulted with local communities. Unacceptable noise levels during the night will affect our local residents, visitors and wildlife. Between the hours of 19.00 – 07.00 there should be no operations permitted, including traffic movements, that create noise pollution levels that are detrimental to the perceived levels of tranquillity that both residents and visitors have a right to enjoy when they choose to live in or visit the countryside. Daytime noise pollution is also an issue and must be limited by mandating the use of equipment that emits less than an agreed level of perceived decibels outside the site boundary. This level to be set following receipt of expert independent guidance and subject to proper public consultation.
• Conditions must be set requiring site abandonment & long term monitoring which require the land be restored to at least as good a condition as before operations started. A surety must be obtained within the planning proposal to this effect.

• Any planning application involving flowback fluid waste disposal must be subject to a condition to that hydraulic fracturing may not be carried out before securing and entering into a long-term contractual arrangement for the routine safe disposal of fracking fluids. The awarding of such contracts to be properly consulted, transparent and without conflict of interest with the council/planning authority.

FFEQS agrees with CPRE that:

• The assessment of facilities for the treatment of flowback fluid according to the Best Available Technique (BAT) standard is unacceptable. The standard employed should ensure negligible harm to the public and to workers at the facility and if that standard cannot be reached, then the facility should be judged as unsuitable and not used.

• The minimum and maximum operational flow rates permitted for safe operation of a flare stack should be specified and what arrangements would be in place for orderly shutdown of the flare stack supply line in the event of flow conditions outside permitted limits, together with the frequency of that circumstance occurring. Arrangements must be specified in the event of the flare being extinguished unexpectedly.

• Systems should be implemented to monitor air emissions from UOGD operations, and that these results should be made publicly available, ideally via a live feed to a dedicated website displaying KPI’s and other easily understood performance criteria., including the displaying any alerts and exceedances.

• The applicant must adequately compensate all residents and businesses that suffer financial loss as a direct result of UOGD. This must be an enforceable planning condition.

Our recommendations are derived from several primary sources, chief among which are those presented by the CPRE in their response to the Lancashire Minerals Planning Authority. This enquiry should also be cognisant of the findings within Professor David Smyth’s paper ‘Hydraulic fracturing in thick shale basins: problems in identifying faults in the Bowland and Weald Basins, UK’ http://www.solid-earth-discuss.net/se-2015-134/se-2015-134.pdf : In particular, the discussion and concerns on pages 32 -39.

Conclusion

FFEQS believe that it is clear that widespread fracking will have a very damaging effect on tourism in rural areas, and we believe that the shale gas industry is one of the greatest threats facing rural tourism in England. We feel that Defra has a duty to oppose such developments within government, and should instead be working to promote sustainable, low-impact tourism in order to preserve the English countryside.

We recommend that the EFRA Select Committee should commission a new independent report of the impact of the shale gas industry on the rural economy, including rural tourism. Until such
a report is produced, the EFRA Select Committee should demand an immediate moratorium on fracking and other forms of unconventional gas production.

August 2016