

Input to Independent Examination of the Fylde Council Local Plan

By Treales Roseacre & Wharles Parish Council - Representor Number 65 :

This relates to MIQ questions :

- Matter 1, Issue 2, Question 7 b & d
 - with resultant effects upon
 - Matter 2, Issue 3, Questions 11, 14, 18; Issue 4 Questions 20, 21
 - Matter 3 Issue 5, Question 23 a; Issue 6 Question 25.

This is a supplementary statement to Treales Roseacre & Wharles Parish Council's earlier submission to this examination. The purpose of it is to provide an up to date illustration of the attractiveness or otherwise of the introduction of shale gas exploration sites into the Fylde Countryside and at the gateway to the Fylde Coast resorts

The attached file shows a series of pictures, including the latest available image of the fracking surface works "Preston New Road" site. This provides a real indication of the attractiveness of such heavy industrial activity being imposed upon the Fylde Countryside and at the gateway to the Fylde Coast Resorts. This provides a backdrop in which to consider the various scenarios of impacts on Employment, Infrastructure and Housing Demands and the Fylde Local Plan as a result of such development.

Page 20 of the Fylde Local Plan to 2032: Publication Version Strategic Environmental Assessment and Sustainability Appraisal - SA Report refers to Minerals and Waste. It states that "The potential for shale gas has been identified across the Fylde Coast area with exploration wells." and goes on to say "This should be taken into consideration in the Local Plan".

Whilst page 13 of the The-Fylde-Local-Plan-to-2032, Chapter 1 – Introduction, has two paragraphs referring to Shale Gas Exploration, Production and Distribution (paras 1.52 & 1.53). There is no reference to the implications on employment, infrastructure, or housing demand.

We have noted in our previous submission that that since August 2015 there has been a National Government policy on the exploration of shale gas in a safe, sustainable and timely way. It requires that this should be taken into account in planning decisions and plan-making. It is not apparent that this has been assessed in the proposed Fylde Local Plan.

Despite the statement in the Sustainability Assessment, the consequences of the reasonable alternatives, based on proportionate evidence; which relate to Shale Gas development has not been demonstrated to have been considered in the Local Plan's evidence base. It is not justified and, therefore, the plan is not Sound.

there is no assessment presented in the evidence base of: an assessment of the reasonable alternatives; the consequential benefits and dis-benefits of Shale Gas development; and their consequential impacts on the Local Plan.

We have set out how such development could impact the five strategic objectives set out in the proposed Local Plan

- **1. To create sustainable communities**
 - We highlighted that the Government best practice highlights that shale gas surface works have been demonstrated to be 11km horizontally from the target geology. There are already whole areas approved and provisioned to support heavy industrial activity like shale gas fracking. There is therefore no requirement for surface works to be located in residential, or countryside areas. Logically this is not sustainable in the

current approach being taken.

- We also highlighted that there remains some 82 unresolved safety recommendations from Government commissioned reviews dating back to 2012. The consequences of these could have knock on effects on health infrastructure provision. These include 61 safety recommendations by the Director of Public Health for Lancashire, following his Health Impact Assessment in 2014 specifically regarding the Cuadrilla fracking proposals at Fylde countryside communities of Little Plumpton, Roseacre and Wharles.
- **2. To maintain, improve and enhance the environment**
 - We have highlighted that in the scenario where Shale Gas development takes place in the Fylde countryside, such development will be in conflict with :-
 - **Objective 2a**, as it will not protect, restore and enhance the quality, character and distinctiveness of the biodiversity, landscape and countryside of Fylde’.; nor
 - **Objective 2g** as it would not protect the best and most versatile agricultural land’; nor
 - **Objective 2i** as it does not promote renewable and low carbon energy
 - **Objective 2l**, as such development would not have regard for the identity, character and setting of the rural settlements.
 - It would require potentially considerable action as a result of **Objective 2k**, ensuring that infrastructure is available to enable new development, whilst protecting and enhancing the natural and built environment.
- **3. To make services accessible**
 - In the event of scenarios which assume that Shale Gas fracking sites are located in the countryside, there will be considerations from the impact of large volumes of large HGV traffic along narrow rural lanes.
- **4. To diversify and grow the local economy**
 - We highlighted that Shale Gas development might be considered to positively contribute to Objective 4a and may prompt requirements under Objective 4b. Shale Gas development appears to be in not supportive of, or in conflict with, Objectives 4 c, d, e, f, g, h, l, j, k. The consequences of scenarios on these objectives should be assessed, but have not been.
- **5. To develop socially cohesive, safe, diverse and healthy communities**
 - We noted that the imposition of Shale Gas development on communities not supportive of this, is in conflict with Objective 5a.
 - The adverse health and well-being impacts identified by the Director of Public Health for Lancashire would indicate that there could be additional demands on health and social infrastructure arising in scenarios including the imposition of shale gas development on adversely affected communities. These are not considered in the Local Plan.

Coming to scenarios for impacts on employment and housing :

- In terms of employment we showed how shale gas, using the scenario of current levels of objection of 31% to shale gas fracking for people to decide whether to continue to visit the Fylde. This would reduce direct jobs by 930 in the Fylde visitor economy. An analysis of the latest data provided by Cuadrilla for its Fylde fracking applications then showed that fracking would create 12.7 FTE direct, indirect and induced jobs over a 10 year period in the Fylde. In this scenario, this would result in a net loss of visitor economy employment in the Fylde of 917. This does not include the loss in the indirect and induced employment

supply chains., which would result in a further loss of employment and potential housing demand.

- We showed that given the levels of retiree and commuting residents, who have discretion as to where they live, that using a scenario of current levels of objection to shale gas fracking, this would yield a reduction in housing demand by some 10,700 dwellings. This scenario would more than wipe out the requirement of 7,768 dwellings being proposed in the proposed Fylde Local Plan.
- This would have further adverse effects on employment in the supply chain serving the housing economy that would need to be modelled in assessing the alternatives.
- The figures now presented here, show the locations of the latest fracking proposals of the licence holder Cuadrilla. You will see how the fracking site at their Preston New Road site by Little Plumpton was a rural countryside and residential location. It is now blot on the landscape by the gateways to the Fylde Coast resorts on the M55 and A583. A safe site could have been developed within the Local Plan on the Blackpool & Fylde industrial site at Whitehills immediately adjacent to the proposed fracking arc of the “Preston New Road” site. This development creates site unique risks, as well as the unresolved safety requirements.
- Such development evidently does not enhance the intrinsic character or attractiveness of the Fylde countryside, coastal resort access and the visitor or residential economies, impacting both employment and housing demand.

Despite these potentially material implications to employment, infrastructure and housing demand these have not been assessed in the proposed Local Plan and should be.

In summary, there are reasonable alternatives that could yield a loss in demand of housing of some 10,700 dwellings and over 900 direct jobs lost in the Visitor Economy as a result of the adoption of the Government Policy on Shale Gas exploration. The Policy requires that this is taken into account.