

Input to Independent Examination of the Fylde Council Local Plan

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

This response relates to Stage 2 MIQs

Matter 6 – General Development

Question 23 - Does the Plan overall take adequate account of shale gas exploration, production and distribution?

It provides a supplement to the material previously submitted with regard the original consultation and

Stage 1 MIQ questions :

- Matter , 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 commitment of investors to the development of shale gas in the Fylde and the 61 unresolved safety requirements raised by the Lancashire Director of Public Health with specific regard to two of the shale gas surface works sites the subject of investments.

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. The manifesto of the new Conservative Government continues to promote the development of shale gas exploitation.

Attached is the May 2017 presentation to investors by AJ Lucas, the principal shareholder of Cuadrilla Resources and the Petroleum Exploration & Development Licences (PEDLs) that cover the Fylde area. Cuadrilla Resources is the "Operator" for these Licences, has held the licences since 2008, having made significant investments in seismic surveys over a 100km² area of the Fylde. In 2015 and 2016 Cuadrilla has secured planning permissions to explore for hydrocarbons at almost 200 sites in and around the Fylde. In the attached presentation (slides 17-22), it is evident that AJ lucas considers prospects to be very favourable for continued investment in the "Bowland Shale Prospect", which the Fylde area covers part of. It is reasonable to conclude that the past levels of investment will continue through the new plan period, particularly with the support of National Government policy as detailed in August 2015.

The infrastructure required should be considered in the Local Plan. This should include housing demand from any increased economic activity, as well as employment land. Surface works for hydrocarbon exploitation have been demonstrated in the UK to be up to 11km offset from the can be located at offsets from the target geology, so there is no requirement for sites not to be located on sites already approved and provisioned for such heavy industrial activities. This would mitigate a number of the issues associated with shale gas exploration to date, associated with locating surface works in unapproved and unprovisioned rural & residential areas.

In 2014 the Director of Public Health for Lancashire conducted a substantial Health Impact Assessment (HIA) specifically about two, then proposed shale gas surface works sites in the Fylde at Little Plumpton and Roseacre/Wharles (attached in the HIA Report and Appendices A-J here). A total of 61 safety requirements were assessed to be needed by the Director Of Public Health The Report detailed 45 specific safety requirement and Appendix J detailed a further 16. After two and

a half years none of these safety requirements have been evidenced as having been resolved as being completed, or an appropriate governance regime having been in operation. Combined with the further 21 unresolved safety requirement of the National Government reviews referred to in our earlier submission, it is clear that that the pollution control regimes are not operating effectively and the affected population have appropriate cause to conclude that shale gas development remains unsustainable. Despite this, the National Government continues to promote shale gas exploitation in England. It is reasonable to conclude that significant objections to the approach taken to shale gas exploitation will remain from those affected. Those who can choose to be unaffected, would reasonably choose to do so.

In a similar way to other government policies such as the provision of housing or climate change provision, the implications of shale exploitation need to be considered, possibly in scenarios of high, medium and low impacts. Current surveys conducted by National Government show levels of objection to shale gas to be some 30%. In considering alternative scenarios A high case might be that 100% of people who can choose as to where they live or visit do not choose to put Fylde on their list of possible locations to retire to, commute from, or spend their leisure time in; A low case might be 0% choose to change their behaviours; and A medium case would be to take the 30% figure currently identified by National Government "Wave Public Attitude Tracker" surveys.

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

In summary, our previous submissions showed that there are reasonable medium case scenario alternatives that could yield a loss in demand of housing of 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. National Government Policy requires that this is taken into account. This should then flow to a reduction in the Overall Assessed Housing Need and provision of appropriate employment land to mitigate some effects. This updated information, reinforces this.