

No Fracking in Balcombe Society

objects to

Angus Energy's planning application WSCC/045/20

Piling stress upon our village

This application offers no benefit to the local community. On the contrary, it puts us under massive stress, piling yet another demand on our time and our mental capacities and wellbeing, and threatening our future yet again. We have been opposing oil exploration in Balcombe now for eight long years. We would have begun fighting the presence of the oil industry in our village ten years ago, from the beginning, had our then parish council not agreed to the first application in 2010, slipping it past a sleeping village without so much as an appearance on the agenda, the application mentioned in the minutes hidden within notes about someone's car port. We then heard nothing about it for two years. We are sick and tired of fighting off these invaders. We want peace, clean air and quiet roads, our beautiful landscape unscathed, and a sustainable future.

Over the years of our battle against the oil industry, the mental and social health of the village has suffered greatly. Friendships have died because of it. A once harmonious village developed factions, a small minority supporting the industry and/or opposing protest. For the significant numbers of us who are active in the campaign, our working lives and families regularly go on hold while we fight off the next bit of legislation or application. We did not choose to live our lives as long-term campaigners, yet that is what has happened. Who is looking out for us and the toll this takes on us? At what point does someone stick their neck out for us and say it has to stop?

In whose interests?

This proposed development is not in the interests of us, the local people, nor of the wider population of West Sussex, nor of the nation. It is not even in the interest of the shareholders of Angus Energy. Dear planners and councillors, almost nothing has changed this time to alter your objections of last time. Therefore, we look forward to your support and recommendation that this new application should not be permitted.

As a country we aim to be carbon neutral by 2050. We are sure you will agree that no one should be prospecting for new sources of oil at a point when oil production must be forced to decline. Most especially, we should not be prospecting for oil or gas that, as Angus admits in parts of this application, requires stimulation to extract it, hence considerably extra expenditure of energy and resources. The carbon intensity of oil from our biggest supplier, Norway, is much lower than can possibly be the case in Balcombe. That imported oil can suffice until we are rid of oil for ever. Angus claim that natural gas will continue to be important in the nation's energy mix. Not for long! In any case, this is an oil well. And what do they intend to do with the gas associated with the oil in Balcombe? Burn it in a flare. They write of energy security. Even if they achieve their stated best-case-scenario yield, the contribution of Balcombe oil will achieve zero point something of national oil production. Should we trash an Area of Outstanding Natural Beauty for that?

Angus claim there would be benefits for local people, the local economy and environment. No. Angus admit that the anticipated 'local' jobs will be lorry drivers and security guards, with petrol stations, restaurants and pubs benefitting. We wonder who ever saw an Angus employee or sub-contractor in a local restaurant or pub when last they were here. These are lies, in our opinion.

There will be air pollution, from generator(s), traffic and flare(s). We have written at length before about the hazards of flares, especially when, as often happens, they operate at sub-optimal efficiency, and when, as is the case here, they are sited below the village and in direct line of the prevailing wind, feeding any toxic emissions into the village. Details of the flares are woolly in this application. Will there be one or two, exactly where, and what will be the target efficiency of these quite different pieces of equipment? Best Available Technique or not? We wonder what the Environment Agency thinks now. There is no mention of tank vents in the Air Quality Assessment, yet emissions from tanks will be present and incorrect if not included in the pollution count from Lower Stumble. NO_x figures are up in this application on the last (rejected) application. Carbon dioxide figures appear curiously to float up and down, compared with last time.

Noise

Flares are extremely noisy, something like a jet engine. Heavy goods vehicles are noisy. So are generators. Sound carries from Lower Stumble up the valley towards

the village, carried on the prevailing wind. People were driven mad in the village by the sound of the drilling in 2013, even more than the people by the site, camping along the road. The lie of the land does that. That noise is not in our interests. More stress. Angus admit in their application that the noise could be excessive, but they 'expect' it to be lower. They provide no evidence. Their info on noise is yet again woolly.

Traffic nuisance and danger

No FiBS is submitting a separate, detailed objection about traffic. In brief, therefore:

The traffic count has increased in this application from the last, by a surprising amount. It must be remembered that the assumptions on traffic movements in the RSK report were incorrect and cannot be relied upon when deciding this application. In 2007, guidance from WSCC Highways came into effect, so that any activity adding over 20 HGVs on the road daily should trigger a full Traffic Impact Assessment (which has never been done in Balcombe). It considered a 20% increase significant enough to invoke the need for a full Traffic Impact Assessment. In our case, 19 vehicles means a 20% increase, and we shall often see more than 20 per day.

The heavy traffic proposed would be dangerous and polluting. Angus' record of breaking the rules is impressive and has been reported to the police. The access road passes through our village, past our houses and our primary school where outdoor classrooms and play areas – so vital in this time of Covid - are right by the roadside. High, long-axled lorries pass under low-hanging trees and low-slung wires. These HGVs are so much bigger than the small HGVs that normally drive along our road. Our road is not made for vehicles of this size. Once out between the village houses and the site, the road is fast, the turning into the site tight. There are accidents waiting to happen.

Potential water pollution

As you know, a hydrology report commissioned by Frack Free Balcombe Residents Association from Tapajós Ltd Groundwater concluded that RSK did not accurately assess the risk to groundwater on behalf of Angus, making repeated

‘misleading and subjective statements’, and omitting important points. Clearly the RSK report is inadequate.

Fauna

Angus’ proposed activities could cause significant harm to wildlife, especially bats. The bat report from RSK is well out of date and should have been redone for this application. Bats will be disturbed by the general activity at the site, but especially by the night lighting and the flare, as well as the noise.

Red kites have returned to breed close to the site. They are protected and listed as threatened, yet they are not mentioned in the RSK report. Things change, and reports need to be updated.

We also care about the fish in the streams around the site. In 2013, many fish suddenly died, and green water (presumably contaminated by tracer dye from the site) ran for some time in the water.

Timescale of proposed works

Just pre-Covid19, Angus applied to do works over three years, but withdrew their application when planners advised the planning committee that the application should be rejected. This time, Angus want to work 30 months in total, of which 12 months would be an extended well test. Yet 90 days is the usual maximum for a well test, according to Oil and Gas Authority guidance. It seems to us that Angus’ testing activity over a 12-month period would be production in disguise.

On acid, are Angus twisting the truth?

Cuadrilla told the DECC in 2012 that they could not work viably at Balcombe without fracking. Angus have admitted at their Brockham site that the ‘Kimmeridge’ of the Weald will not yield oil viably without fracking. We in Balcombe lie on the same formation as Brockham. It is unlikely that Balcombe will prove to be the free-flowing ‘sweet spot’ Angus Energy promise to their shareholders. At some point in the future they would apply to frack. Of course we have to take into consideration the fact that the government changed the definition of fracking in the Infrastructure Act so that nearly 90% of the wells that have been

fracked, for example, in America would not be considered to have been fracked under current UK law.

But even in this application, how intensively do they want to acidise? Angus Energy refer repeatedly to 'acid washing'. An acid wash is a minimal 'tickle-acidation', just in the well and super-close to the well. (Angus compare this to acidisation of water wells, but in truth, it is very rare that water wells are acid-washed and if they are it happens only in a minimal way, within clean, hydrocarbon-free formations.) Angus's claim that they would simply 'acid wash' in Balcombe is, we believe, a case of minimising reality, an attempt to soothe objection, and pull wool over eyes. In their application they also let slip that they want to 'stimulate' the formation with acid. Now, that sounds a little closer to the truth.

The previous paragraph teeters on the brink of the domain of the Environment Agency, but it is important for the council to recognise that there is at best wooliness, at worst (we would opine) intention to deceive in Angus' accounts of the extent of their intended acidisation.

It is of note that in the 2010 application, the plan for the well test was to acidise up to just below fracturing pressure using a 15% solution of hydrochloric acid. By 2012, the solution was to be reduced to 10% because the Environment Agency considered hydrochloric acid over 10% toxic. Now, quietly, it has slipped back to 15%. Higher concentrations are to Angus' advantage. The Environment Agency might have a current view on this.

Wider concerns

In law we know that the council has legally to rely upon the competence of the Environment Agency. In the real world, to do so could be unjust and immoral if the Environment Agency has passed permits based on woolly and perhaps (we would opine) wool-pulling details.

We have become expert over the years in oil and gas technology, planning, politics, and the law around hydrocarbon extraction... Of our many reasons for opposing the presence of the oil industry in our village, some are not considered relevant to a planning application. Some lie in the domain of the Environment Energy. There is increasing evidence around the world of earthquakes being caused by this family of oil and gas extraction activities and the disposal of its wastes, of water pollution

and the huge dilemma of how to dispose of the large quantities of toxic liquid waste this kind of activity produces. It is outrageous that you, planners and councillors, are not allowed to consider those important matters. It is equally outrageous that you are not allowed to consider the proliferation of wells that would be required to exploit this kind of formation. This application is not just about Balcombe. It has implications for the whole region, and you, the planners, need to care about that.

Angus' finances

The company's share price has fallen from 30p to less than 1p. They have set up separate companies to cover their different sites. How solid are their finances? Who cleans up if something goes wrong? Who decommissions the well and prevents leaks of oil or gas if the company goes bankrupt? Who cares when, five or ten or 20 years on, the steel corrodes and the cement crumbles, and methane and other hydrocarbons start to leak? West Sussex County Council? Mr Greenwood, the landowner? We, the taxpayers? Our grandchildren as yet more methane leaks into a chaotic world?

Rejected last time, reject this time?

Angus' application WSCC/071/19 was withdrawn after planning officers recommended refusal. Little has changed in their current application, and in our view the new application demonstrates a similar woolliness and poor attention to detail. It is just as inappropriate in an Area of Outstanding Natural Beauty as it was a few months ago. There are no mitigating factors and the development is of zero benefit to the local community. We hope you, the planners, will stand firm to your previous decision and recommend rejection, and we hope our councillors will follow the advice and reject this application.

Then perhaps, finally, we shall have peace.