

My Survey

Submitted By: Anonymous user

Submitted Time: 12/19/2018 5:16 PM

Your Details

Agent or Personal Submission

Individual

First Name

David

Last Name

Scott

Job Title

[REDACTED]

Organisation

Address

[REDACTED]

Address 2

[REDACTED]

City / Town

[REDACTED]

Postcode

[REDACTED]

Email Address

[REDACTED]

Phone Number

[REDACTED]

Agents

First Name

Last Name

Job Title

Organisation

Address

Address 2

City / Town

Postcode

Email Address

Phone Number

Representations

Your View

Unsound

Soundness Test No:

P2 Has the council prepared its Preferred Options Paper and taken into account any representations made? , C3 Did the council take account of policy and guidance issued by the Department? , C4 Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?

Plan Component

Relevant Policy, Paragraph, Appendix or Proposal Map

Page 127 Draft Policy| MIN O4, Para 2 and Policy Clarification 4.89

Details

I would like to comment on aspects of the FODC Draft Plan Strategy. I am challenging this Draft Policy MINO4 in relation to Consistency Tests 3 and 4. Paragraph 2 states that "Exploratory Works for unconventional hydrocarbon which do require planning permission will be considered under draft Policy MIN 01". This is to suggest that 'Exploratory Works' will be treated differently to 'Extraction' works. Exploratory Works are not defined as being different to Extraction works within this document though they are treated differently. This distinction became the focus of the Department for Infrastructure's own review paper that completed its consultation in February 2017 - "Review of Permitted Development Rights for Mineral Exploration" (C4). The core premise behind Option 1 of this Review was of course, the removal of Permitted Development Rights for Petroleum Exploration from Class A of Part 16 of the Schedule to GDPO, but also the recognition of the equivalency of the Exploration and Extraction processes. This recognition, though it was not the only option presented in the review, was to bring Northern Ireland in line with Scotland and Wales. It reflects an awareness of the Precautionary Principle referred to in the SPPS in relation to unconventional hydrocarbon 'extraction' and applied it to 'exploration' - namely 'the drilling of boreholes preparatory to petroleum exploration'. If Fermanagh and Omagh District Council align itself with Option 2 of this review it would leave a gaping hole in the planning constraints on Unconventional Hydrocarbon 'exploration'. Accepting that the two are different will align Northern Ireland with England and as evidenced by the 'fracking' of 2 "exploratory" wells in Lancashire, the boundaries of the 'Exploratory Works' are very indistinct and the impacts of exploratory 'fracking' are often as great as that of an extraction well. None of these subtleties are discussed or developed within either either of the Key Background Papers - Employment and Economics (Oct 2018) or Minerals (Oct 2018). In fact the critical aspects of this Review paper seem to have been ignored or bypassed (C3). If FODC chose to align itself with Option 1 of the review paper then Paragraph 1 would state "The Council will not permit the exploration or exploitation of unconventional hydrocarbon extraction...." Paragraph 2 would be superfluous and should be removed. Policy Clarification 4.89 final 2 lines should be - "presumption against the granting of planning permission for the exploration and extraction of unconventional hydrocarbon." I hope these changes will be given due consideration. I am making the submission below under section P2 of the 'Soundness' Test'. The definition of fracking needs to be more strictly defined to take into account the 625 responses sent in by the public in 2016, to the FODC Preferred Options

Paper. I submit that the sentence on page 127, Policy Clarification 4.89 of the draft FODC Local Development Plan Strategy that ends 'also known as hydraulic fracturing or fracking' should be replaced with: 'also known as hydraulic fracturing or fracking; which means the generation of mechanical fractures in rock below the surface by means of the physical process of pumping fluid at high pressure into the rock via a petroleum wellbore for the purpose of enhancing the flow of all hydrocarbons between the rock and the wellbore.' The reason why this more detailed definition of fracking is required is so as to fully cover all of frackings various forms and names, by defining fracking by its actual physical process. Draft Policy MIN04 [also page 127] states that the FODC 'will not permit exploitation of unconventional hydrocarbon extraction until it is proved that there would be no adverse effects on the environment or public health'. Proof that fracking is safe can not now ever become available as the huge and ever growing body of peer reviewed science compendium available at www.concernedhealthny.org shows that fracking is dangerous under all circumstances, no matter what level of regulation exists. Below is the last paragraph of the latest compendium [Fifth edition, 266 pages, March 2018] " We close with an observation by Maryland physician Judy Stone, MD, whose recent essay in Forbes speaks for all who have contributed to this Compendium: 'Fracking profits go to private industry but the public—families and communities—bear the costs of the many health complications from the drilling. There is growing evidence of a variety of health problems being associated with fracking. Common sense dictates that drinking and breathing cancer-causing agents will take their toll. The correlation is too strong to ignore, especially when we have other, cleaner energy options. For our safety and that of future generations, we should not allow the new administration to sell off public lands, nor allow drilling on our land, and should ban fracking completely.' "Again, I hope the change above will be given due consideration.

Details

Modifications

Modifications

See modifications outlined above

Representation

Written

Data Protection

Consent to publish response

Yes, with my name and/or organisation