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Submitted By: Anonymous user

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Representations

Your View

Unsound

Soundness Test No:

P2 Has the council prepared its Preferred Options Paper and taken into account any representations made?

Plan Component

Part 2, Section 7.0 Monitoring and Review

Relevant Policy, Paragraph, Appendix or Proposal Map

Objective 21

Details

measurement Objective 21 on Minerals (for planning purposes includes Oil and Gas) Page 200 Purpose To assess the quantum of minerals extracted in the District to serve local and regional needs and to ensure there is an adequate and steady supply. Relevant plan objectives 15 (Page 29) is as follows "Sustainably manage and safeguard where appropriate our natural resources including minerals and water, protecting the environment and providing sustainable services including effective and sustainable waste management to meet population needs." Suggested change "protecting the environment" to "protecting the environment and public health". Many of the submissions made with regards to unconventional oil and gas exploration and extraction were made with particular reference to public health. Whilst protection of the environment is important, protection of public health is even more important. If one reads the plan, one can see many of the paragraphs on Minerals policy talk about the effect of Mineral extraction on communities, on people rather than just on the Environment, so it is logical to conclude the objective should also include a reference to Public Health. I have also some issues as to whether the wording of the Measurement objective 21 could be seen as advocating a presumption for the assessment of Minerals (ie exploration). Exploration would be needed in the first instance prior to any extraction. I would be concerned that it could be used as an argument to further both exploration and extraction of minerals. This could be seen as contrary to the SPPS in relation to unconventional fossil fuels. I'm not sure it is the councils place to be assessing if there is an adequate supply of minerals extracted locally for both FODC and Regional needs. (There is no definition of what Regional needs are either). My understanding is these measurements are taken at a Northern Ireland level currently. Whilst I understand the need to assess Minerals, the wording of this objective is not quite right. If I am a Mineral licensee who has a contentious project, I can point to this plan to show the Council having a duty to provide an assessment of what an adequate supply of that mineral for FODC /Regional district is, while also making FODC rule on the application. My view is it should not be the council doing this assessment.

Your View

Unsound

Soundness Test No:

P2 Has the council prepared its Preferred Options Paper and taken into account any representations made?

Plan Component

Part 2, Section 4.0 Economy

Relevant Policy, Paragraph, Appendix or Proposal Map

Minerals 4.89

Details

I would like to comment on the FODC Draft Strategy Plan. I believe that 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 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.' "

Your View

Unsound

Soundness Test No:

P2 Has the council prepared its Preferred Options Paper and taken into account any representations made? , P3 Has the Draft Plan Strategy been subject to sustainability appraisal including Strategic Environmental Assessment?

Plan Component

Part 2, Section 4.0 Economy

Relevant Policy, Paragraph, Appendix or Proposal Map

Minerals Policy : P122-127

Details

Note : I have mentioned cumulative effects in SA comments hence why I've ticked this box. Section Economy - Minerals and Cumulative effects. Add Cumulative effects to wording in Min01. Cumulative effects needs to be catered for specifically within the policy. We note that with for example wind farm development a specific paper on the effects of wind farms, especially their cumulative effects has been commissioned. This is as a result of their proliferation. The Minerals policy seems to be extract what is needed locally and regionally (no definition on regional requirements) - see Objective 21 which states that FODC will assess this. Cumulative effects on Mineral exploration and production is only mentioned once in the 4 pages of mineral policy section, and only then is it mentioned in relation to the road network and adverse transport effects. The cumulative effects of Minerals development must be assessed in relation to all aspects of Mineral exploration and extraction. I believe a separate paragraph needs to be explicitly mentioned in the Plan. The context and Justification opening to Minerals Policy DOES NOT mention the many licences for Minerals within the FODC area already in operation with some proposals under consideration. This is not considered a measurements objective either (eg total amount of FODC area under exploration and/or extraction for Minerals). The Policy seems to read, with regard to the measurements objective, that it is one of if needed, it will be extracted, rather than one of assessment of whether its the correct thing to do for FODC area and its people. I am concerned with the wording of MIN03 especially how this applies to ACMD and the fact that for ACMD exploration boreholes which do not require planning permissions are assessed outside of ACMD constraints. The issue here which one always has with Minerals development is that a borehole is considered temporary development currently, even when that borehole still exists after the development is finished. We saw a full exploration well for oil and gas drilled under 'permitted development' in Woodburn Forest within 400M of a reservoir that supplied 100,000 homes. While this is a function of the law as it currently stands, There was draft legislation to change but with a non-functioning assembly then no safeguarding of ACMDs or otherwise exist. It should be noted that had oil/gas been found at Woodburn, the company would then have to apply for planning permission to turn the 'temporary development' into a 'permanent development' even though

all one would be looking for is a temporal permission, given the actual hole and drilling had completed. under FODC Plan it would be quite feasible to build a series of exploration oil and gas wells in an ACMD and then seek permission to turn into production facilities once completed. The other sort of borehole which is used for Minerals exploration is a small typically auger type bore drilled to a depth of 100-150 metres such as was used in gold and other metal exploration around Omagh. I believe upwards of 400 such holes have been drilled in a relatively small area, and all were completed without planning permission. There needs to be some constraint against the cumulative effect of using the legislation while it stands to salami-slice applications. More over there needs to be some general constraint, and mention of the cumulative effects on Minerals development in the plan policies, otherwise FODC or certain parts of FODC area risk becoming 'sacrifice zones' for development, displacing people, and acting against the general intentions of the plan to protect people and places locally. Without the mention of cumulative effects, I believe Minerals development can become overbearing. It is worth mentioning once again that cumulative effects only appears once within Minerals development discussion and then only in relation to effects on road transport. It is worth noting that draft policy RE01 on Wind Energy has a constraint on cumulative effects.. "j) they do not create unacceptable cumulative impacts when viewed in conjunction with other operational and approved renewable and low carbon energy generation developments." MIN01 needs such a wording. eg. The Council will support proposals for minerals development where it is demonstrated that they do not have an unacceptable adverse impact upon:-i) the natural environment;ii) the landscape and visual amenity;iii) the historic environment;iv) the water environment;v) public safety, human health and amenity of people living or working nearby; andvi) road safety and convenience of road users.andvii) where the cumulative effects of such proposals on i to vi above have been assessed for all minerals developments regardless of whether those developments are classed as permitted development or temporary development.

Modifications

Sorry I misread the form and have included modifications with my statements above. I would just like to iterate that many of the comments received re Minerals development mention Public Health, and that should be reflected in the plan. On cumulative effects, it appears in the Wind/Renewables policy as a consideration. I believe this due to the fact that cumulative effects is mentioned in the Wind energy paper and lots of work done on that. Perhaps given Minerals issues in FODC something similar needs commissioning for FODC ?

Representation

Oral Hearing