

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT
PROCEDURE)
(ENGLAND) ORDER 2015
NOTICE UNDER ARTICLE 13 OF APPLICATION FOR PLANNING PERMISSION
FOR
THE WINNING AND WORKING OF MINERALS BY UNDERGROUND
OPERATIONS**

Proposed development at: Albury Park Wellsite, East of New Road, Albury, Surrey.

I give notice that; Island Gas Limited.

Is applying to; Surrey County Council

For planning permission for;

The retention of the Albury wellsite for the production of Compressed Natural Gas (CNG) and the generation of electricity, including: temporary flaring to re-establish gas flow, the installation of CNG and generating plant, the retention of a transformer unit, HV switch room, perimeter fencing and water tank and the installation of ancillary plant and equipment including a tanker loading area, site office, WC, lighting and security cameras. Access to be via the existing forestry track, with the retention of a temporary parking area permitted under planning permission GU08/0483. All on some 1.51 hectares for a temporary period of 15 years with restoration to commercial forestry. For the avoidance of any doubt this application does not relate to the drilling of any further boreholes or to the hydraulic fracturing of rock for shale gas.

Objections

Air pollution and emissions

The four week period of gas flaring is very concerning for a number of reasons.

The Research Journal of Environmental and Earth Sciences 4(5): 525-528, 2012 states: *'Gas flares have harmful effects on the health and livelihood of the communities in their vicinity, as they release a variety of poisonous chemicals. Some of the combustion by-products include nitrogen dioxides, sulphur dioxide, volatile organic compounds like benzene, toluene, xylene and hydrogen sulfide, as well as carcinogens like benzo(a)pyrene and dioxins. Humans exposed to such substances can suffer from variety of serious ill-health effects.'*

No detailed analysis has been produced of the gas to be flared. This is a serious omission from the application.

Evidence of gas flaring from the USA and Australia suggests that the total harm caused by flaring pollutants is more than the sum of the individual components.

Natural gas processing is a significant source of fugitive emissions of both methane and volatile organic hydrocarbons (VOCs). The World Bank estimates that every year, some 360 million tonnes of CO₂ is released to the atmosphere through flaring and venting. This has a detrimental effect on the environment, contributing significantly to global warming and acidification of both land and sea. A considerable proportion of this CO₂ comes from the

production of Oil and Gas. At a crucial point in human history, if we are to avoid runaway climate change ‘keeping it in the ground’ needs to be the concern of every public authority, and indeed the UK’s Climate Change Act 2008 places legal obligations on public bodies to comply with emission reductions targets relating to climate change. These duties require that a public body must, in exercising its functions, act in the way best calculated to contribute to the delivery of emissions reduction targets. **Flaring is incompatible with this objective, which is why there are international calls for ‘green completions’, involving the capturing of the gas – this is not proposed at this site.**

Gas compressor emissions

Very concerning for the local population is the proposed notion of powering the gas compressor by burning some of the gas from the well 24/7 for 15 years. **There needs to be a detailed analysis of the effects of the exhaust emissions of this from a variety of aspects: human health, ecology, local amenity impacts e.g. from those using the nearby playing fields. Moreover, the effect on vegetation is likely to be very significant.**

Traffic and Transportation

The increase in vehicle movements is very concerning, given the nature of their load. In effect there will be a couple of tonnes of compressed gas being moved on a daily basis. These vehicles are a serious danger to not only the local population around the site but to those on the route to the ultimate destination. A recent US study, by the National Institute for Occupational Safety and Health, showed that vehicle crashes are the single biggest cause of fatalities to oil and gas workers while the increase in onshore gas production has resulted in a 350% increase in traffic fatalities in regions where gas production is occurring.

Unanswered questions from the application

1) where will the condensates from the compressor go?

2) Some of the chemicals used to remove water (dehydrators) from the gas can be toxic – how will these be disposed of?