



**Food & Water Europe**  
Rue d'Edimbourg 26  
Brussels 1050  
Belgium

Contact person:  
Andy Gheorghiu, Fracking Policy Advisor  
+49 5631 50 69 507 (land),  
+49 160 20 30 974 (mobile),  
[agheorghiu@fweurope.org](mailto:agheorghiu@fweurope.org)



**Food & Water Watch**  
1616 P Street NW  
Suite 300  
Washington DC, 20036

Contact person:  
Scott Edwards, Co-Director FWW Justice  
+1 202.683.4969 (o)  
+1 914.299.1250 (c)  
[sedwards@fwwatch.org](mailto:sedwards@fwwatch.org)

Per email: [leanne.palmer@pins.gsi.gov.uk](mailto:leanne.palmer@pins.gsi.gov.uk)  
**Leanne Palmer**  
**The Planning Inspectorate**  
**Temple Quay House**  
**2 The Square**  
**Temple Quay**  
**Bristol**  
**BS1 6PN**

01 February 2018

- 1. Shale development plans at Harthill (Rotherham County Council)**  
**Application No: RB2017/0805**  
**Planning Inspectorate/Appeal Reference: APP/P4415/W/17/3190843**  
**Appellant's name: Ineos Upstream Limited**
- 2. Shale development plans at Bramley Moor Lane**  
**Application reference: CM4/0517/10**  
**Appellant's name: Ineos Upstream Limited**  
**Appeal reference: APP/U1050/W/17/3190838**

Dear Ms Palmer,

In July 2017 we filed [formal comments](#) against the plans by the international chemical company Ineos to begin the process of hydraulic fracturing, or fracking, at [Bramley Moor Lane/Marsh Lane](#), Derbyshire, and [Harthill](#), Rotherham. You'll find our submitted comments also attached hereto and we kindly ask you to take our arguments into consideration during Ineos's appeal process.

In those comments we explained in detail our reasoning against the proposed shale gas development in the affected Council districts, pointing out that in order to properly and thoroughly evaluate Ineos' application, the Councils should consider the cumulative impacts of the project, including traffic, waste disposal and other impacts. Failure to do so means that the projects are being looked at in a piecemeal fashion that fails to fully consider the anticipated impacts that will ensue with the granting of the applications.

- 1. Why the impacts of entire the fracking process and the industrialisation of the targeted regions needs to be consider**

The unconventional fossil fuels industry, especially shale gas production, consumes space and resources on a large scale and has a massive detrimental impact on regional planning and

development. Your consideration of Ineos' application appeal must consider all impacts from the exploration to the extraction of so-called unconventional fossil fuels and should recognize that these projects inevitably collide with the existing regional planning frame in the targeted areas.

The exploration phase is simply the first step in the inevitable extraction phase and cannot be considered and assessed separately, nor can it be separated from other proposed drilling in the targeted regions.

**Hydraulic fracturing is a crucial part of the exploration phase contemplated here.** Without the so-called "stimulation drilling" a company cannot ascertain if there is enough economically viable gas in the underground. Once they make that positive determination, full scale fracking will inevitably ensue.

Additionally, this proposal should be viewed and assessed as part of a larger plan by Ineo to develop an extraction industry more broadly in the targeted regions. We strongly disagree with the view that **the exploratory vertical wells** development should not be regarded as an integral part of a more substantial project; the applications for three wells in two councils that are geographically close together **cannot be regarded as discrete proposals that could proceed independently.** The cumulative impacts must be taken into account now. Otherwise it will be difficult to set a limit for the needed scale of industrialisation at a later stage.

There is much local opposition to these proposed projects. Speaking in a parliamentary debate on November 22, 2017, Mr Lee Rowley, the Tory MP for North East Derbyshire, clearly pointed out [that shale gas will bring wholesale industrialisation and change the countryside for decades](#). He added that Derbyshire doesn't want the kind of industrialisation this would bring.

At a meeting on 18 October 2017, the [Rotherham Borough Council voted to ban fracking](#) and seismic testing on council-owned land. On 25 January 2018, the [Rotherham Borough Council voted unanimously to oppose Ineos's shale gas exploration plans at Harthill](#). This will also impact Ineos' application to drill an exploration well at Woodsetts in the same PEDL.

Ineos is now obviously afraid that their arguments were not convincing and the company [is looking to bypass local decisions on its fracking proposals](#).

This latest attempt by Ineos to suppress local decision-making is not surprising since the company is actively seeking to suppress all democratic opposition to its projects. As you are likely aware, Ineos recently went to court to obtain an injunction against peaceful displays of protest by concerned community members. The [court injunction against „persons unknown“](#) is the same type of anti-democratic tactic that Ineos now looks to employ by attempting to bypass local decisions related to their applications. On top of that, Ineos wants to [force its fracking way into National Trust's Clumber Park](#) while at the same time the company [apparently misled the public over fracking in Sherwood Forest](#).

Food & Water Watch and Food & Water Europe have pointed out that Ineos' push for [more fracking on both sides of the Atlantic to produce more plastics](#) harms communities in the US and will eventually pollute the oceans and UK's shores. We've also recently [examined Ineos' environmental record](#), including government and media reports of its plants in the UK, Belgium, France, Germany, Italy, Norway and Sweden, and found that many of its facilities experienced accidents, safety lapses, chemical leaks, substantial pollutant releases and even fires and explosions on a frequent basis. If this company is allowed to frack the UK, more pollution and more accidents are likely to follow.

## 2. Fracking has a devastating impact on climate conditions and targets while undermining regional economic benefits from renewables and energy efficiency

On a global scale, we have a very significant, but mainly ignored, problem with fugitive methane emissions from gas extraction in general and from shale gas in particular. There is a leakage rate of roughly 4 to 12 percent from the lifetime production of gas wells being emitted into the atmosphere<sup>i</sup>. Since methane is at least eighty-six times more powerful as a greenhouse gas than CO<sup>2</sup> over a twenty-year period, opting for business as usual or even more fracking simply means that it won't be possible to reach the climate objectives and/or the objectives of the Paris Agreement and holding "the increase in the global average temperature to well below 2°C [...] and to pursue efforts to limit the temperature increase to 1.5°C"<sup>ii</sup>. These crucial commitments do not leave much room to improvisation as there is little time before these thresholds are reached: We already reached the 1.1°C point in 2016<sup>iii</sup> and the 1.5°C point will be reached in less than 10 years with current emissions<sup>iv</sup>.

The scientific study 'Natural Gas and Climate Change' by Professor Kevin Anderson and Doctor John Broderick of the Tyndall Centre for Climate Change Research reveals the urgency with which Europe needs to phase-out all fossil fuels, including fossil gas. All EU countries can afford just nine more years of burning gas and other fossil fuels at the current rate before they will have exhausted their share of the earth's remaining carbon budget for maximum temperature rises of 2°C.<sup>v</sup> By 2035 the substantial use of fossil fuels, including natural gas, within the EU's energy system will be incompatible with the temperature commitments enshrined in the Paris Agreement – leaving therefore no room for investments in gas infrastructure that will inevitably lead to a further fossil lock-in.

For the UK to do its part in meeting the challenge of climate change, one of the most urgent tasks is to decarbonise the electricity supply. According to the Committee on Climate Change the UK needs to have decarbonised electricity to 50gCO<sup>2</sup>/kWh by 2030<sup>vi</sup>, from around 330 gCO<sup>2</sup>/kWh in 2015.

This transition to a mostly renewable electricity system is not only achievable, it is underway. Renewables in the UK are growing at an astonishing rate – from 2010 to 2016 renewable electricity production increased from 7% to 25%. This is cleaning up the UK's electricity system, and creating new jobs and industries. Renewables are popular and the transition will be good for the UK and the planet – improving people's health and environment and boosting the economy. Allowing fracking projects like the one proposed by Ineos represents a step backwards in the needed shift to renewables and our joint efforts to save the planet from catastrophic climate change.

It is also worth mentioning that the BNP Paribas Groups, a leading financial services provider in Europe and worldwide, has announced on 11 October 2017<sup>vii</sup> that the group „**will no longer do business with companies whose principal business activity is the exploration, production, distribution, marketing or trading of oil and gas from shale and/or oil from tar sands.**“ Furthermore, it „**will no longer finance ... LNG terminals that predominantly liquefy and export gas from shale.**“

The real community benefits lie, therefore, definitely with local energy produced by renewables and increased energy efficiency. New gas development will only lead to a further fossil lock-in which needs to be avoided at all costs.



We urge you to take into consideration that

- a) the potential social, community, health and climate impacts of an unconventional oil and gas industry in the UK will be severe and irreversible,
- b) Ineos, in particular, has proved irresponsible and isn't capable of dealing with the risks and impacts of its industrial activities and
- c) the decisions about the applications of Ineos need to be decisions of the affected councils and local residents who have to suffer the impacts of these projects.

Moreover, for the reasons cited above, in addition to the other reasons given in our prior submissions to the [Council of Derbyshire](#) and the [Council of Rotherham](#), we urge the Planning Inspectorate to uphold the local council decisions, immediately reject Ineos's applications and protect the communities affected by the harms that fracking will inevitably bring.

Sincerely

Andy Gheorghiu  
Fracking Policy Advisor

Scott Edwards  
Co-Director Food & Water Watch Justice

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<sup>i</sup> Howarth, Methane emissions and the greenhouse gas footprint of natural gas: 2016 update. Available at: [http://www.eeb.cornell.edu/howarth/summaries\\_CH4\\_2016.php](http://www.eeb.cornell.edu/howarth/summaries_CH4_2016.php)

<sup>ii</sup> Paris Agreement. Available at: [http://unfccc.int/files/meetings/paris\\_nov\\_2015/application/pdf/paris\\_agreement\\_english\\_.pdf](http://unfccc.int/files/meetings/paris_nov_2015/application/pdf/paris_agreement_english_.pdf)

<sup>iii</sup> World Meteorological Organization, Climate breaks multiple records in 2016, with global impacts. Available at: <https://public.wmo.int/en/media/press-release/climate-breaks-multiple-records-2016-global-impacts>

<sup>iv</sup> Carbon Brief, Analysis: Only five years left before 1.5C carbon budget is blown (May 2016). Available at: <https://www.carbonbrief.org/analysis-only-five-years-left-before-one-point-five-c-budget-is-blown>

<sup>v</sup> Prof Kevin Anderson, University of Manchester & Uppsala University and Dr John Broderick, University of Manchester & Teesside University. „Natural gas and Climate Change“. 17 October 2017. Available at: [http://www.foeeurope.org/sites/default/files/extractive\\_industries/2017/natural\\_gas\\_and\\_climate\\_change\\_anderson\\_broderick\\_october2017.pdf](http://www.foeeurope.org/sites/default/files/extractive_industries/2017/natural_gas_and_climate_change_anderson_broderick_october2017.pdf)

<sup>vi</sup> [https://www.theccc.org.uk/wp-content/uploads/2013/12/1785b-CCC\\_TechRep\\_Singles\\_Chap2\\_1.pdf](https://www.theccc.org.uk/wp-content/uploads/2013/12/1785b-CCC_TechRep_Singles_Chap2_1.pdf)

<sup>vii</sup> BNP Paribas. Press Release „BNP Paribas takes further measures to accelerate its support of the energy transition“. Available at: <https://group.bnpparibas/en/press-release/bnp-paribas-takes-measures-accelerate-support-energy-transition>