

Dear Councillor,

I am writing on behalf of Frack Free Isle of Wight and our “**Don’t Drill The Wight campaign**” to inform you of our analysis of the public responses to the public consultation for Application [20/00513/FUL](#) from UK Oil and Gas plc for the site at Arreton. Since the portal remains open, several other comments are still being added intermittently, but the closing date for our analysis was **3rd September 2020**.

I hope you will find this report informative and helpful (since this is the spirit in which it has been prepared), in providing you with evidence in understanding the level of concerns of many objectors to this application.

Introduction

We made the decision to track, record and analyse both the support and objection statements for several reasons.

Firstly: We wanted to gauge the public’s reaction to the application by documenting the objections and supporting statements.

Secondly: We wanted to track the progress and pitfalls of our campaign, which was undertaken to better inform and assist the public in taking up their right to respond to the public consultation, despite the Covid 19 restrictions, and to publish these figures on our website.

Thirdly: We wanted to collate and analyse the responses to discover specific reasons/criteria for objection or support in order to focus on the validity of the statements for planning decision purposes and to highlight the key passions and concerns of the local community.

We discovered during this process that the IWC planning portal IT set-up had several flaws, was not user friendly for those who were not internet savvy and did not accurately and plainly reflect information regarding the application or the number of public responses during the consultation.

Statutory Consultees’ comments were often mixed in with public comments instead of being separately categorised, making it difficult to track their responses.

The planning portal document page for the application did not accurately reflect the final number of comments submitted, since it only displays an accumulated total of comments submitted directly online to the portal. Therefore public comments - sent in by email or through the post - which were scanned in for addition to the documents list, were not included in the main page totals tally.

As result we decided to independently track the documents submitted.

Documents were individually downloaded, charted and categorised by our team, with the results updated daily for publication on our campaign website. This highlighted the true strength of feeling and level of engagement from the public. A detailed breakdown of our findings is set out below, in contrast to the figures on the planning portal, which still do not show the true picture.

At the time of writing it displays a total of just 916 public comments, with 853 of these being objections.

The Analysis - Number of Public Responses. See Chart 1 in the Appendices

Having spent the last two months collating, reading and analysing comments we discovered the following:

- a)** Many responses were accidentally duplicated in the process of staff copying and adding to the documents list and these needed to be removed from final totals for accuracy. Some were also duplicates because the same comment was emailed and then entered online again, probably because it had not appeared due to the week-long, or more, delay in posting email responses.
- b)** Two comments were removed from the list at a later date. One of these was actually our Frack Free Isle of Wight submission, at our request, because of a typo in statistical information. A corrected copy was then resubmitted. We then realised that the original should, we believe, still have been kept in place.
- c)** Some comments were classified wrongly (as support rather than objections and vice versa)

After correcting these issues we tallied the Objections and Support statement figures with the online totals for the documents in the consultation. We found there were **2225 objections, 68 supporting and 3 neutral public comments**.

Therefore, we will be adjusting our website figures accordingly with these figures dated up to 3rd September.

Key Areas of Concern. See Chart 2 in the Appendices

Having read the appropriate guidelines for the validity of comments with regard to objections, we removed **436 or 6%** of comments that we felt would not be taken into consideration, either because there was no comment - just an objection - or because the comment was not substantiated by the guidelines.

The following percentages of the total reflect key areas of concern.

- **Environmental Impacts 42%:**
(Wildlife, Biodiversity and Ecology **15%** / Emissions and Climate Emergency **14%** / Landscape and AONB **13%**)

Of these key areas, many objectors stated that the application did not reflect:

1. *The Island Strategy Policy statements related to the enhancement and protection of IOW Ecology, Landscape and Land Use and continued further development of Wildlife Diversity.*
2. *Appropriate and full assessment of all emissions / The Council's stated commitment to reduce emissions to Net Zero by 2030.*
3. *Accepted we need to focus on increased investment in, and development of, renewable energies and energy storage making the IOW a beacon for use of local supplies for the island.*

- **Pollution 20%:**
Impacts on (Human Health **14%** / Water Courses/Aquifers **6%**)
- **Site Access & Traffic Plan 11%:**
Impacts on (Transport – all stages including Ferries / Traffic/ Accidents and Inadequate Island Infrastructure)
- **Eco Island Status/Economy and Employment Opportunities 17%:**
(Reduced Tourism/ Tourist Economy/ No substantiated sustained local employment/ **11%** Undermining of our valuable Biosphere status/ **6%**)
- **Geology 3%**
(Inaccurate information in the application / No current seismic 2D or 3D assessment or records and the use of outdated geological data in analysis / Threats of seismic shifts and earthquakes)

Summary

Given that, despite the disruption of the pandemic lockdown, over 2,000 of IOW residents submitted objections, we feel that this displays the real depth of feeling and concern that this application has aroused in our local communities.

A tiny, but important minority of the objections came from mainland residents: Regular tourists, relatives of locals and second home owners, people who have experience of oil extraction in their own communities and qualified professionals engaged in wider research of Environmental Protection, Geology, Hydrogeology, Climate Emergency and Medical health.

Of the 68 supporting statements we assessed that

- *Fewer than 10 were from local residents and the remainder were from investors or supporters of UKOG.*
- *18 should have been classified as Not Applicable as they contravened the guidelines, and many others may be regarded as N/A since they focus almost entirely on NIMBYism, speculation of the company's performance and activity at other sites - not the details of the application or NPPF guidelines.*

In Conclusion

We do appreciate that this application has been submitted at a very difficult time and that this type of industrial application will be novel to members of the planning committee. The technical problems experienced by Surrey County Council's virtual local planning committee in deciding UKOG's Dunsfold planning application has led to a

challenge by UKOG to their decision and subsequent re-submission of the application.

<https://drillordrop.com/2020/08/03/dunsfold-drilling-plans-to-be-decided-again-after-refusal-ruled-invalid/>

Our members feel that it is imperative that, since this is a novel application, it should be decided in chambers, by the full planning committee, to ensure that all members feel able to discuss, challenge and clarify points arising, without such technical issues impeding the final decision.

Finally we hope that the Government will reform planning legislations to support Local Planning Authorities in overcoming the complexities of decision-making for onshore fossil fuel applications.

A new briefing is currently being finalised by Environmental Consultants for submission to ministers.

Recommendations include:

- Planning Authorities should use evidence within their report to challenge claims made by oil and gas companies that are not substantiated by fact within applications.
- Energy Legislation, Planning Policy and relevant sections of local mineral authority policies should be updated to meet Net Zero targets.
- Planning authorities should recognise that sustainability defined in planning policies must take into consideration social, climate and environmental aspects of an application.

Thank you for reading this long report. We hope you have found it both informative and helpful.

Kind regards,

Sylvia May

On behalf of Frack Free Isle of Wight.org

APPENDICES

Additional Information and relevant reading.

The national emphasis of impacts on the Climate Emergency and Emissions from new onshore oil and gas exploration and production wells is being raised at Government Level.

Sarah Finch from The Weald Action Group has been granted, by a court judge, the right to a full judicial review to challenge Surrey County Council Planning Committee's acceptance of a further 20 years to drill 4 additional production wells and a deep wastewater reinjection well at Horse Hill.

The review is being raised on two grounds

1. Impacts on Climate Change and the Environment

UKOG's application did not meet the government agreed CC regulations for achieving a Net Zero Target by 2050. UKOG failed to assess and give a detailed analysis of all predicted emissions in their application, as these should comprise a total emission analysis, including those from: **the physical well site preparation and extraction activity, the downstream impacts over a 20 year period of transportation and the future burning of the fossil fuels produced from the wells.**

The Judge, Lord Justice Lewison, also announced that a subsidiary argument in Sarah's case should be considered in detail as a **new ground** at the hearing.

The additional ground centres on what councils are required, under planning rules, to consider when deciding a planning application. Crucially this recognises that current planning guidance/law is out of step with national and local climate change commitments.

You can read more of this here <https://drillordrop.com/2020/09/25/surrey-campaigner-takes-on-national-planning-policy-in-legal-climate-challenge/>

2. [The UK Climate Assembly](#) has challenged the proposed efficacy of key parts of the UK Government's published strategy, calling for real action in achieving the reduction of greenhouse gas emissions. It has voted strongly for the reduction of UK production of oil and gas, a move away from further production of fossil fuels and against the use of Carbon Capture Storage
3. Boris Johnson has signed the [World Leaders' Pledge to Reverse Biodiversity Loss by 2030 for Sustainable Development](#). Key paragraphs related to this application are at points 5 and 7.

Appendix Chart 1 – Number/Type of Documents as of September 3rd 2020.

Council site total documents	2483	Figures Descending
UKOG Docs	55	2428
Site Notice	1	2427
Consultees	18	2409
Neutral	3	2406
Support Final	68	2338
Support Duplicates Deleted	1	2337
Objections Final	2225	112
Objection Duplicates Deleted	109	3
Deleted by Planning Office	2	1
Application form Copy	1	0
Objections Method of Submission		
Online	856	
Email	1063	
Post	306	
	2225	Net

Appendix Chart 2 - Percentage of Objection Comments For Each Category

Category	Number	Rounded Percentage
Eco/Wildlife	1064	15%
Climate Emergency	1006	14%
Pollution/Health	948	14%
AONB/Lscape	937	13%
Traffic /infrastructure	761	11%
Economy/Employment	757	11%
Water	444	6%
Biosphere	441	6%
Geology	209	3%
Non Applicable	436	6%
Total	7003	100%