

Objection to Cuadrilla's proposed changes to the Environmental Permit – March 2019
Permit Number: EPR/AB3101MW/V005
Preston New Road, Little Plumpton. Lancashire, PR4 3PJ

I am a resident local to the Preston New Road site and I strongly object to Cuadrilla's application which seeks to amend their Environmental Permit to allow for the following:

- Addition of chemicals including Methanol and Glutaraldehyde to the permitted fracturing fluid
- Changing arrangements for the management of waste
- Conducting multiple fracture episodes per lateral well
- Reduce environmental monitoring of surface water and ambient air quality

What is currently being proposed by Cuadrilla is completely different to what was initially presented at Lancashire County Council and during the subsequent Inquiry. Granting this application would essentially enable Cuadrilla to undermine the procedures that are in place to ensure appropriate scrutiny of planning applications, including the consideration of risks to health and safety as well as environmental impact.

During the Inquiry, the Planning Inspector considered Cuadrilla's Planning Application in detail over a period of six weeks. Local people, local groups, legal teams, environmental groups and stakeholders painstakingly pored over the minutia of Cuadrilla's proposals including, environmental monitoring, the proposed fracturing process, the chemical components, flow back and the method of storage and disposal. Such deviation from the original plans in terms of process and the chemicals being used, as now being sought in this latest application, necessitates re-examination and becomes a Planning matter.

During the lengthy and intense Inquiry, the Planning Inspector evaluated specialist evidence of risk. It is not acceptable to permit Cuadrilla to subject residents to unevaluated risks to their health and safety as well as to the environment by way of seeking piecemeal amendments to their original EA permit. It is incomprehensible that Cuadrilla be enabled in this way to introduce new and untested methods at the Preston New Road site without robust and comprehensive consideration of site-specific risks. For example, allowing multi fracks on lateral wells would create significant and unconsidered risks to residents living just 300 metres away from the site.

Cuadrilla state that depending on geological conditions between 10 and 40% of the fracking fluid may return to the surface. This equates to somewhere between 60 and 90% of the chemicals and radioactive frack fluid remaining somewhere in the ground and possibly migrating up to the surface through fissures, transmissible faults or well casing failure which can be caused by the fracking induced seismic events.

The addition of further chemicals to produce a cocktail of substances used in the fracking process combined with radioactive sub surface materials, must surely necessitate an environmental impact assessment. This presents a huge concern and another unevaluated health and safety risk to the thousands of residents living within a two mile radius of the site.

The addition of the toxic chemicals Methanol and Glutaraldehyde (GA) is likely to impact on the health of the most vulnerable residents living close to the site including the young, elderly and those with existing respiratory health conditions. Many adverse health effects on humans have been reported in association with biomedical uses of GA. The prevalence of asthma, chronic bronchitis and nasal symptoms in humans is significantly correlated with peak concentrations of GA exposure. The severity of symptoms is dose-related. Chronic inhalation affects the nose and respiratory tract, and lesions become severe with prolonged duration of exposure.

Polyacrylamide is already being used and during the fracking process it breaks down to Acrylamide which is a highly toxic substance at very low concentrations. Acrylamide is officially classified by the International Agency for Research in Cancer (IARC) as 'a probable human carcinogen'. Seeking to introduce additional chemicals in this way and at this later stage means that the dangers and risks associated with mixing substances with those already in use has not been assessed. Without professional scrutiny these risks are unquantified, it is however inevitable that additional pollutants create additional risk. The faulted geology at Preston New Road increases the risk of any pollutants migrating to the surface and contaminating the land and surface water. The land at Preston New Road is still being used for farming. Water on the fields surrounding the site provides drinking water for animals and runs off into the brook which runs through the gardens of residents.

The implications for multiple fracturing of wells have not been given consideration during the previous planning stages and therefore the associated operational risks to health, safety and environment are completely unassessed. The transportation, storage and usage of additional concentrated toxic chemicals must give rise to a comprehensive review of the Environmental Risk Assessment which currently deems the Preston New Road site to be low risk.

The sum of Cuadrilla's application amounts to substantive changes to the fracking process and deviates considerably from the proposals that were evaluated by the planning Inspector, which ultimately lead to Planning Permission being granted. Cuadrilla's application to introduce untried, untested, unassessed methods must necessitate further planning consideration. It would be totally unacceptable for the EA to permit these changes without a full and proper assessment of the risk to the environment as well as health and safety and would likely incur legal challenge.

Richard Marshall