

RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL

MUNICIPAL YEAR 2013-2014

**DEVELOPMENT CONTROL
COMMITTEE
3 OCTOBER 2013**

**REPORT OF: SERVICE
DIRECTOR PLANNING**

	Agenda Item No. 7
<p>APPLICATION NO: 12/1253 - DRILL AN EXPLORATORY BOREHOLE TO TEST FOR UNCONVENTIONAL GAS RESERVES IN THE WESTPHALIAN AND NAMURIAN STRATA, FIELD ON LEFT HAND SIDE OF PANTYBRAD ROAD, NORTH OF LLANTRISANT</p>	

1. PURPOSE OF REPORT

Members are asked to consider the report below and determine the application in accordance with the advice and recommendation.

2. RECOMMENDATION

To **APPROVE** the application in accordance with the advice given

3. BACKGROUND

This application was originally reported to a meeting of the Development Control Committee on 4 July 2013 with a recommendation that it be approved (see **APPENDIX A**). At that meeting Members deferred determination of the application for a site visit which was held on 17 July 2013 and the matter was reported back to Committee on 15 August 2013 (see **APPENDIX B**). At that meeting Members were minded to refuse the application contrary to recommendation because they considered:

- (i) that insufficient information has been supplied to enable the Development Control Committee to appropriately assess the risks of granting the application, in particular no details as to the location of or the impact the development would have on existing underground mine workings in the vicinity of the area;
- (ii) the highway infrastructure including a weak bridge is unsuitable for additional heavy vehicles travelling to and from the application site;
- (iii) there is potential for surface water contamination owing to the topography of the area.

As a consequence it was resolved the application be deferred to the next appropriate meeting of the Development Control Committee for a report on

the strengths and weaknesses of taking a decision contrary to recommendation.

Members are advised the matters the subject of their concerns are dealt with in considerable detail in the report attached at **APPENDIX A**. Notwithstanding, the following additional comments are offered.

Risks due to underground mine working

Arising from a search of The Coal Authority records the applicant has submitted information and evidence that the proposed drilling site is not affected by recorded coal workings (see **APPENDIX C**). Moreover, the Council has since undertaken its own consultation with The Coal Authority which has confirmed that the application site does not fall within a Development Defined High Risk Area and is located instead within the defined Development Low Risk Area. This means there is no requirement under the risk-based approach for a Coal Mining Risk Assessment to be submitted for this application proposal. If there were any mining issues The Coal Authority would have objected and, in any event, the applicant will need a licence from them as they propose to drill into and through coal measures.

Therefore, it is concluded that there is no substantive evidence to suggest the development poses a risk either to or because of underground mine workings at this site.

Highway infrastructure, including weak bridge, unsuitable to serve the development

The highway safety and access considerations are discussed in detail in the report at **APPENDIX A**. Although the Transportation Section has expressed some concern about the suitability of the highway network to serve the development, given the temporary nature and short duration of the proposal, the limited number of HGV movements, and the applicant's Traffic Management Plan proposals, there is no highway objection in respect of these specific matters. In terms of the adequacy of the weak bridge crossing the highway south of the site, the applicant has provided information regarding the type of vehicle entering the site with the largest having an axle weight of between 15 and 18 tons and with one vehicular movement in and out at the end of the drilling operations. In response the Transportation Section has advised that given the largest vehicle load is on the advised weight limit and that there will be one in and out movement by this largest vehicle there is no highway objection. However, if Members remain of the view there are overriding concerns about the adequacy of the weak bridge it is suggested that, in the event of planning permission being granted, a condition be imposed requiring the bridge to be surveyed for its structural adequacy before the commencement of drilling operations.

Risks to natural watercourses in the site vicinity and the potential for surface water contamination

As stated in the report at **APPENDIX A**, the applicant proposes the construction of a cut-off ditch around the site perimeter and submerged sealed interceptor tank to prevent discharges of surface water from the site. This method of preventing pollution of natural water courses in the site vicinity has been accepted in principle by the drainage consultees, most notably Natural Resources Wales, subject to conditions that require the submission and approval of detailed surface water and associated pollution control measures prior to commencement of works on site. These conditions are recommended as numbers 3, 4 and 5 in the original report at **APPENDIX A**.

Therefore, it is concluded that the applicant has submitted an acceptable strategy to prevent risks of pollution to watercourses and surface water and that the precise details of the drainage and associated pollution preventions measures in accordance with that strategy are capable of being adequately addressed by conditions recommended in the original report. Members are respectfully advised that comparable water contamination risks was the main issue in a recent proposal for exploratory drilling operations at Llandow Industrial Estate in the Vale of Glamorgan and the risks were dismissed.

Summary

Taking the above comments and the original report at **APPENDIX A** into account it is concluded that this application is acceptable in land use planning terms and therefore recommended for approval. Members are advised that in the event of planning permission being granted there are several other permissions, which regulate these drilling operations and safeguard public and environmental health, the applicant first has to obtain before drilling is able to commence. These are:

- (i) Petroleum Development and Exploration Licence
- (ii) Access Agreement from The Coal Authority
- (iii) Health and Safety Executive approval for drilling
- (iv) Well Operations Notice from the Department of Energy and Climate Change.

It must be stressed that in the event of the application being refused for reasons that reflect Members concerns it would be difficult to bring forward substantive evidence to support reasons based on those concerns if the application were to proceed to an appeal. Indeed, Members are respectfully advised that the recent refusal of planning permission for a comparable proposal for exploratory drilling at Llandow Industrial Estate, Vale of Glamorgan, was successfully appealed and costs awarded against the Council.

If, however, after further consideration Members are still minded to refuse planning permission then the following wording is suggested which reflect their concerns:

In the opinion of the Council the proposed development is unacceptable because:

- (i) insufficient information has been supplied to enable the Local Planning Authority to appropriately assess the risks of granting the application, in particular no details as to the location of or the impact the development would have on existing underground mine workings or the natural watercourses in the vicinity of the area;*
- (ii) the highway infrastructure including a weak bridge is unsuitable for additional heavy vehicles travelling to and from the application site;*
- (iii) there is potential for surface water contamination owing to the topography of the area.*

For these reasons the proposed development conflicts with policies AW5, AW7 and AW8 of the Rhondda Cynon Taf Local Development Plan.

APPENDIX A

APPLICATION NO: 12/1253/10 (PB)
APPLICANT: Coastal Oil and Gas Limited
DEVELOPMENT: Drill an exploration borehole to test for unconventional gas reserves in the Westphalian and Namurian strata.
LOCATION: FIELD ON THE LEFT HAND SIDE OF PANTYBRAD ROAD, NORTH OF LLANTRISANT
DATE REGISTERED: 03/01/2013
ELECTORAL DIVISION: Town (Llantrisant)

APPLICATION DETAILS

Planning permission is sought to drill one exploratory borehole to test for unconventional gas reserves in the Westphalian and Namurian strata on land in a field west of Pantybrad Road, north of Llantrisant. The application is for the purpose of drilling to take samples of these strata to enable laboratory testing with a view to the utilisation of methane as a clean energy supply. This is a continuation of the applicant's ongoing sampling and testing program across South Wales, Bristol, Somerset and Kent. **This application is for exploration works only and does not entail any ground stimulation, more familiarly known as 'fracking', nor does it involve directional drilling.**

The consent is sought for a temporary period of one year, during which time establishment and site clearance would last 4 weeks, drilling and associated operations 8 weeks, laboratory testing 4 weeks, and gas testing 36 weeks. Hours of work during site establishment and site clearance would be 10 hours per day from 08.00 to 18.00 hours, and during the drilling period would be 24 hours, seven days per week.

The layout of the site will involve enclosing the entire perimeter of the field with 2 metre high round-top mesh panel temporary fencing together with the construction of a cut-off drainage ditch linked to a submerged interceptor tank on the site boundary to collect any surface water run-off from the site. An 11 metre high drilling rig will be erected towards the centre of the site, together with a fuel tank, pipe rack, settling tanks and mud mixing tanks. Portable cabins for use as site offices, on-site laboratory, mess room and drying room. Four floodlights will be erected at the site. The lights will be on stands no more than 3m in height, the lights will be hooded and down pointing so that light cannot spill over the site boundary or point directly at an existing dwelling or onto the highway. Other plant and equipment on site will comprise a generator, portaloos and banded fuel stores. Parking facilities will be laid out near the site entrance. To reduce the site noise to a minimum, additional screening around the noise sensitive equipment and around the site will be implemented. Soft noise absorbent matting will be used on the site fencing and around the main sources of noise.

A statement accompanies the application and explains in detail the operations the subject of the application. A summary of the main points in the statement is provided below.

The drilling process will involve the utilisation of two drilling rigs:

- An initial drilling rig will set the surface casing to protect any groundwater near to the surface.
- The second drilling rig will set up over the borehole and drill and sample the strata.

Dependant on weather and site conditions a portable wheel wash may be provided to ensure no mud is taken onto the highway from traffic leaving the site. Again, depending on weather and site conditions, consideration will be given to the surface of the parking area. If wet weather persists a membrane surfaced with rolled chippings will be established in conjunction with the aforementioned wheel wash.

The proposed traffic flows into the site will be as follows:

Drill rig 2
Drill Pipe 4
Casings 5
Tanks and other equipment 5
Survey equipment 1
Cabins 5
Tankers used water 3
Steel linings 2
Foul sewerage tanker 1 per week
Skips 4 per week
Drilling supplies (transit) 3 per week
Personnel (cars/vans) 2/3 per 12 hr shift

The existing road infrastructure be utilised and that no additional highway amendments are required.

The works for the boreholes will include:

- Install 2m diameter concrete ring up to 3m deep
- Drilling a surface conductor hole at approximately 30cm diameter a sufficient distance into rock head.
- Cementing the surface completion in place.
- Pressure testing the surface completion.
- Drilling at approximately 25cm diameter into the strata, steel casing will be set to the necessary depth to protect any groundwater present.

- Drilling rig 1 will then leave site, to await the arrival of rig 2.
- Drill to the base of the Westphalian and Namurian measures and collect samples utilising suitable Well Head Protection and Diversion System to a suitable vent system.
- Utilising suitable monitoring systems
- Geophysical logs will be completed in the borehole
- Upon completion of the drilling, casing will be installed in the borehole with a suitable well head assembly fitted
- Pump tests to indicate the permeability and suitability of the strata to produce gas will be undertaken

Gas control during drilling will be effected by a number of valve arrangements.

The levels of Methane, Oxygen, Carbon Monoxide and Hydrogen Sulphide will be continually monitored on at the site. Drilling will be 24 hours per day. The site will be manned at all times. During the drilling of the borehole the levels of the drilling fluids will be constantly monitored by the drilling crew and tests on the fluids made during the drilling of a length of drill rod. All drilling fluids will be maintained in a closed loop system for ease of monitoring for leaks. The volume of the borehole at 800m will be 25m² the total volume of fluid in the closed loop system will be approximately 30m² (6,600 gallons).

The rig and equipment will only be in place for a short period of time and in this respect it is not intended to carry out any specific landscaping, as there would be insufficient time for any meaningful establishment.

On completion of the drilling steel casing will be installed into the well and a suitable well head assembly installed. If the testing is unsuccessful the borehole will be abandoned in accordance with Natural Resources Wales (the legacy Environment Agency Wales) and Health and Safety Executive practices. The surface will be restored to a condition similar to or better than prior to commencement of work and any soils that are moved as a temporary measure will be stored on site and restored to their original position on completion.

If the testing is successful then the well head will be adequately secured and an additional planning application for longer term pilot production will be submitted.

Aside from being subject to planning control, the exploration and production of onshore hydrocarbon resources are subject to licensing and regulation under legislation the responsibility of other agencies, including the Health and Safety Executive (HSE) and the Department of Energy and Climate Change (DECC).

These provide a framework within which the search for and production of oil and gas onshore can be undertaken in a safe and orderly manner.

SITE APPRAISAL

The application site comprises an agricultural field covering an area of 0.14 hectares in the countryside immediately adjacent to the western side of Pantybrad Road north of Llantrisant Business Park. The site slopes very gently upwards to the west and north and is bounded by a hedgerows and trees. Access to the site is gained from Pantybrad Road via a fence-off gateway in the south-east corner of the field.

The application site is surrounded by other agricultural fields. The nearest residential properties to the site are isolated dwellings situated at Rhiwfelin and Rhiwfelin Fach each side of Pantybrad Road, a comparatively narrow rural road that extends from Tonyrefail to Llantrisant. The nearest commercial and business properties, which includes The Royal Mint, are located some 500 metres to the south on the Llantrisant Business Park.

PLANNING HISTORY

None.

PUBLICITY

The nearest neighbouring properties have been notified, also site notices erected and notice published in the press.

A total of 22 letters/emails received from members of the public and other interested parties objecting to the application proposal for reasons summarised below. These representations include letters from The Royal Mint, Rhondda Cynon Taf Green Party, and the Campaign for the Protection of Rural Wales (CPRW). Several of the other objections received are from interested members of the public who live outside the locality of the development site and outside the County Borough (Wrexham, Cardiff and Bridgend).

- Proposed exploration gives raise concerns and about, and could be a precursor to, future proposals for gas extraction and the process known as hydraulic fracturing ('fracking'). Area not suitable for hydraulic fracturing.
- This kind of development linked with earthquakes and ground water contamination, pollution, and is already banned, under review, or the subject of moratoriums in other countries, and has had disastrous consequences in the USA. Also, it has been the subject of locals concerns and controversy where exploration has been planned and taken place elsewhere in the UK.
- Disturbance and damage to wildlife, countryside and local landscape.

- The proprietary drilling aid 'Pure-Bore' is toxic to water fleas (*Daphnia magna*), an important species in food chain of the fresh water environment and an indicator of water cleanliness.
- Noise nuisance.
- Substandard and unsuitable highway access to and from the site.
- Traffic generation causing more pollution
- Concerns over long term integrity of well after it is capped and abandoned.
- Environmental studies should be undertaken before decision taken. Why isn't the proposal the subject of a full Environmental Impact Assessment?
- Human health and safety issues associated with non-conventional gas exploration sites.
- Gas is a fossil fuel and will exacerbate climate change.
- Proximity of drilling site to The Royal Mint, which is highly significant in the supply of coinage to the UK and world economy and is a designated Control of Major Accidents Hazards (COMAH) site, on account of the hazardous substances held on site.
- Lack of community engagement and consultation by applicant and Local Authority.
- Questionable economic justification for gas extraction by this method.
- Concern that the applicant company might not have the funds and resources to undertake professional execution of the proposal, deal with any adverse consequences, and adequate restoration of the land.

CONSULTATIONS

Transportation Section - no objection.

Land Reclamation and Engineering - no objection subject to drainage conditions.

Public Health and Protection - no objection, though comments that the proposed noise mitigation measures shall be implemented prior to the commencement of development, and advises that there are records of three private water supplies within 1km of the exploratory borehole, the closest being approximately 700m to the north-east.

Natural Resources Wales (legacy Environment Agency Wales & Countryside Council Wales) - no objection subject to recommended conditions covering pollution prevention measures, surface water and foul water disposal, restoration requirements, and biodiversity interests.

Parks and Countryside Section - no objection on grounds of grassland impact, as the site is moderately improved, though care required that trees and hedgerows are not adversely affected and no hydrological impacts on surrounding protected habitats, and Public Right of Way (Llantrisant 273) running close to southern boundary is not compromised.

Health and Safety Executive - does not advise, on safety grounds, against the granting of planning permission in this case.

Dwr Cymru/Welsh Water: No adverse comment on hydrology and sewerage grounds, and on the basis the application is for exploratory drilling only.

POLICY CONTEXT

Rhondda Cynon Taff Local Development Plan

The application site lies outside settlement limits of Llantrisant (Policy SSA 13) and within the Mynydd y Glyn and Nant Muchudd Basin Special Landscape Area (Policy SSA 23.6) and an area of Sandstone resources (Policy AW 14.2).

Policy CS2 places emphasises on sustainable growth in the Southern Strategy Area.

Policy CS10 seeks to protect mineral resources and to contribute to the local, regional and national demand for a continuous supply of minerals, without compromising environmental and social issues.

Policy AW5 specifies criteria for new development. It requires new development to have an acceptable impact on the character and appearance of the site and surrounding area, no significant impact on the amenities of neighbouring occupiers, retention of site features of natural environmental value, to design out opportunity for crime, and to have good access.

Policy AW8 seeks to preserve and enhance the natural environment by protecting it from inappropriate development.

Policy AW10 seeks the protection of environmental and public health and does not permit development proposals where they would cause or result in a risk of unacceptable harm to health and/or local amenity because of issues such as contamination and pollution, etc., unless they can be adequately be mitigated of overcome.

Policy AW12 supports development proposals which promote the provision of renewable and non-renewable energy, such as on-shore oil and gas, where there is no unacceptable effect upon the interests of soil conservation, agriculture, nature conservation, wildlife, natural and cultural heritage, landscape importance, public health and residential amenity.

Policy AW14 safeguards from development the resources of Sandstone.

Policy SSA23 requires the highest standard of design in the Special Landscape Area.

National Guidance

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The Department for Energy and Climate Change (DECC) published the Overarching National Planning Policy Statement (NPS) for Energy EN1 in July 2011, which indicates that fossil fuel power stations will continue to play a role in our energy mix as the UK makes the transition to a low carbon economy.

The following documents set out the land use planning policy guidance of the Welsh Government in relation to mineral extraction and related development in Wales.

Planning Policy Wales

Mineral Planning Policy Wales states 'where oil and gas operations can be carried out in an environmentally acceptable way and consistent with the principles of sustainable development, there is no case in land use planning terms for placing more restrictions on the development than are necessary to ensure the protection of the environment.

MTAN2: Coal (January 2009).

Welsh Government's '*Energy Wales: A Low Carbon Transition*' states that gas will be a key transitional fuel because greenhouse emissions from gas are significantly less than coal subject to the method of extraction. It goes on to note that gas is a flexible, responsive and reliable source of energy which can play a key role in the transition to a genuinely low carbon energy system.

PLANNING CONSIDERATIONS

The chief material considerations in the determination of the application for proposed exploratory drilling to test for unconventional gas reserves at this location are:

- Planning policy context
- Potential environmental and amenity impacts, with particular reference to visual and landscape impact, ecology, access and highway safety, water environment, noise and vibration, and other miscellaneous matters.

Before these material considerations are considered it is important to deal with a couple of preliminary matters raised in the representations received from members of the public and other interested parties.

Firstly, a significant number of objectors to this application raise concerns as to possible future proposals for gas extraction and in particular the process known as hydraulic fracturing (familiarily termed 'fracking'). Whilst these concerns are understood, the current proposal does not include extraction whether by fracking or other methods. Any future proposals for extraction would require a further application for planning permission and the grant of planning permission for mineral exploration does not indicate a presumption in favour of future exploitation of any mineral resources found. **Therefore,**

concerns about fracking, and the perceived consequences of it, are not material in the determination of this application.

Secondly, it has also been questioned whether the proposal should have been the subject to Environmental Impact Assessment (EIA), however, it was screened and determined that EIA was not required. The proposal does not fall within any of the descriptions given in Schedule 1 of the *Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999*, as amended. Although Schedule 2 of the same Regulations includes deep drillings, the site area at 0.14 hectare does not exceed the applicable threshold of 1 hectare, accordingly the proposal is not EIA development and an Environmental Assessment was not required to accompany the planning application.

The proposed development in the context of national and local planning policies

Exploration and extraction of indigenous gas resources has considerable support at a national level, evident in the Department of Energy and Climate Change's *Overarching National Planning Policy Statement for Energy (EN-1)* and the Welsh Government's *Energy Wales: A Low Carbon Transition*, which see gas as playing a key role in our energy mix as the UK makes the transition to a low carbon economy. Likewise, *Mineral Planning Policy Wales* also supports oil and gas operations where they can be carried out in an environmentally sensitive way consistent with the principles of sustainable development.

The local planning policy context is provided by the Rhondda Cynon Taf Local Development Plan (LDP), adopted in March 2011, which provides a firm basis for rational and consistent decisions on planning applications and appeals. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that, if regard is to be had to the development plan for the purposes of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise. This is re-affirmed in *Planning Policy Wales*.

Set in this framework the application site lies in the countryside outside settlement limits of Llantrisant and within the Mynydd y Glyn and Nant Muchudd Basin Special Landscape Area (Policy SSA 23.6) and an area of Sandstone resources (Policy AW 14.2). *Planning Policy Wales* provides that the countryside will be conserved and enhanced for the sake of its natural heritage, natural resources etc. Special Landscape Areas (SLAs) have been designated to protect areas of fine landscape quality within Rhondda Cynon Taf and in order to protect their visual qualities, development proposals within these areas are required to conform to the highest possible design standards. Mineral resources, such as Sandstone, are safeguarded from any development which would necessarily sterilise them or hinder their extraction. Therefore it is important to consider the consequences of the proposed development for these designations, and these potential impacts are dealt with below.

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Visual and Landscape Impact

The application site is in an agricultural field in a sparsely populated rural location to the north of Llantrisant and the Llantrisant Business Park. It is shielded by a hedgerow, and tree line. Much of the equipment and cabins proposed to be installed on the site will be screened from view by the boundary vegetation. At 11 metres in height the drilling rig has the potential to be the most prominently visible piece of equipment at the site, and will be visible above the hedgerows, though is unlikely to look too dissimilar to other structures found in the countryside, such as small electricity pylons and telecommunications masts. However, drilling will take place only over a period of 16 weeks after which the rig and cabins will be removed and all that will remain will be the fenced compound and well-head apparatus. The site will be lit at night, which has the potential to render the site more visible in the hours of darkness, though the lights will on stands no more than 3 metres in height and will be hooked down and pointed so that light cannot spill over the site boundary.

Despite being located next to a public highway, the site is not visually prominent, and as such, views to the site are relatively long distance and limited. The site is not easily viewed from public viewpoints, other than from the public highway fronting it and from the public right of way to the south. There are unlikely to be prominent views of the site from nearest dwellings and only limited long distance views from parts of the north side of Llantrisant that overlooks Llantrisant Common. It is therefore considered that any impact on the visual amenity of the area and the character and appearance of the landscape would be minimal, particularly given the rural location, the temporary nature of the operations and the fact the site would be reinstated upon completion of the works. As consequence it is considered the proposal would not have a long term and irreparable visual and landscape impact.

Ecology

The application site comprises an agricultural field that has been moderately improved and is not subject to any specific designations therefore is not one where there will be an adverse impact on species-rich grassland. The boundary hedgerows, however, are species rich and the applicant's own ecological report recommends maintenance of a 3 metre buffer as a minimum around the hedges to protect them. The Council's Ecologist recommends that a planning condition be used to protect the trees and hedgerows on the site from drilling operations and storage activities. Also, he expresses concern that any removal of the hedgerows to facilitate access to the site would be undesirable on ecological and visual impact grounds. In response to this concern it is noted the proposed access would involve trimming of the hedgerow each side of the gate in order to improve visibility splays, and results in removal of 2.5m the hedgerow on the north side of the access to increase its width to 4.8m to facilitate two-way vehicular movement required by the Highway Authority. On balance the loss of this comparatively short stretch of hedgerow is outweighed by the highway safety benefit (discussed in

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more detail below) and can be replaced by substitute planting as part of the site reinstatement. On this basis it is considered the proposal would not have any significant impacts of the wildlife and ecological interests of the site and its surrounds.

Access and highway safety

The proposed access from the main highway network will be via the existing network from the A4119 travelling in a north-easterly direction onto Heol –y-Sarn Road, then past the Royal Mint and up the lane up the hill towards Pantybrad. The entrance to the site is an existing field gate on the left hand side of Pantybrad Road. The drill rig is proposed to be brought to the site on a truck and delivered very early in the morning when traffic is minimal. The applicant contends that once on site traffic will consist of minimal numbers of cars at the beginning and end of each shift and the occasional van visits. The rig and supply vehicles will not be overweight. No new highways or tracks are to be created.

The access arrangements have been the subject of careful consideration by the Transportation Section, which has made the following points:

- Pantybrad Road is sub-standard in terms of width for safe two-way vehicular movement, structural integrity, drainage, sub-standard bridge and street lighting;
- There is concern about any increase in traffic along this sub-standard lane, with limited areas for vehicles to pass one another leading to potential reversing movements to the detriment of highway safety;
- There is a weak bridge crossing the highway south of the site currently being monitored by the Highway Authority with a 17t weight limit.

In relation to these issues raised the applicant has responded with the following information;

- a traffic management plan which includes limited vehicular movement controlled by site operatives for HGV deliveries;
- the type of vehicles entering the site, with the largest having an axle weight of between 15t and 18t, with one movement in and one out at the end drilling operation.
- Proposals to widen the site 4.8m for safe vehicular movement, visibility increased either side of the access by trimming the outside of the hedgerow, turning areas within the site and wheel washing facilities.

Subject to the development proceeding in accordance with these details, and having regard to its temporary nature, the limited amount of HGV movements, and given that the largest vehicle load is on the advised weight limit of the weak bridge, the Transportation Section offers no highway objection to the proposal. In consideration of the above there is no highway safety reason to withhold planning permission.

Water environment

A chief concern, expressed by members of the public and commonly mentioned in association with the exploration and extraction of unconventional gas resources from rock strata, are the risks of pollution to surface water drainage systems and underground aquifers, in particular from any loss of drilling fluids used in the drilling procedures.

The applicant proposes the construction of a cut-off ditch around the site perimeter and submerged sealed interceptor tank to prevent discharge of surface water from the site. None of the drainage consultees has objected to this proposal as a means of preventing pollution of the surface water environment.

In terms of ground water the applicant states that shallow ground water is proposed to be cased off to stop the flow of such water into the borehole. Also, the water and fluids used for drilling are contained in a closed loop system that can be easily monitored for leaks. Moreover, the drilling fluid is a proprietary product known as 'Pure-Bore', which is a non-toxic biopolymer that degrades naturally within 8 to 52 weeks and is understood to be commonly used to drill water wells without contamination problems arising and has been accredited by the Centre for Environment, Fisheries and Aquaculture Science (part of DEFRA) for use in the marine environment. However, representations submitted by the Campaign for the Protection of Rural Wales (CPRW) contend that Pure-Bore is toxic to the Water Flea (*Daphnia magna*), which is an important species in assessing environmental toxicity and because it is at the bottom of the fresh water food chain upon which higher order aquatic life depends. In response it is pointed out that the same concerns about Pure-Bore were expressed in relation to a recent identical proposal for exploratory drilling for unconventional gas reserves at Llandow Industrial Estate, Cowbridge. In that case, which proceeded to appeal by means of public inquiry, the Inspector in his decision letter of 6 July 2012 offered the following comments in relation to the toxicity of Pure-Bore:

'I have no reason to believe that bacteria, which would treat the product as a food source, are not found in the aquifer, particularly the uppermost layer which is likely to be effective in transmitting water. In any event, the manufacturer [of Pure-Bore] reports that it is still capable of breaking down in connate water (water trapped in sediment or rock at the time of deposition). Assessment using juvenile Daphnia Magna shows a minimal toxicity indistinguishable from the degree of error involved in the test at 1:10,000 dilution. Whilst 42% of the organisms were immobile after 48 hours at a 1:1000 dilution, this is likely to be due to the product's oxygen demand rather than any chemical toxicity.'

On the basis of the above there is no compelling evidence of Pure-Bore posing a significant risk of contaminating ground water and its associated ecology.

Natural Resources Wales (the legacy Environment Agency Wales) is the relevant regulatory authority insofar as groundwater pollution is concerned, though Dwr Cymru/Welsh Water (DCWW) also has examined the application

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in relation to the vulnerability of its ground water sources. It is of particular significant that neither of these consultees has objected to the proposal. NRW has offered no objection subject to conditions covering pollution prevention measures, surface water and foul water disposal and restoration requirements. DCWW has confirmed that application site is some 7km south east of its nearest raw water source known as Hendre Ifan Springs and also some 13km north east of its nearest groundwater source (boreholes at Bridgend). DCWW has no objection on the basis the application is for exploratory drilling only and follows the correct drilling procedures in accordance with NRW guidelines.

Public Health and Protection has pointed out that its records indicate there are three private water supplies within 1km of the exploratory borehole site, and the closest is approximately 700m to the north east. Although these private supplies are much nearer the site than DCWW's, the drilling process would be comparable to that used in drilling for additional water abstraction and the proposed monitoring that, if any fluid were to lost, its volume would be extremely limited such that the risk to private water supplies would be minimal.

Taking the above into consideration, and having regard for the fact that the borehole would be sealed with NRW guidelines, there is no reason to believe the application development would pose a threat of pollution to surface water and ground water in the vicinity of the site. Accordingly, it is concluded that the proposal would not harm the quality of the surface water and ground water environment.

Noise and vibration

The application proposes 24 hour working during the drilling period. Accordingly, the application is accompanied by a Noise Assessment, which identifies critical noise sensitive premises to be the located approximately:

- 250 m east (Rhiwfeilin Fach farm)
- 450m south (Royal Mint etc, Llantrisant Business Park)
- 600m north (Coedcae-mawr)
- 720m north west (Llantrisant Care Home)

of the drilling site. Rhiwfeilin Farm, approximately 675m to the north west, is owned by the same party as the proposed drilling site and is therefore not considered a noise sensitive premises for the purposes of test drilling.

The results of the background noise survey conducted by the applicant suggest that without any additional screening there may be a marginal significant increase in noise to the nearest receptors. To reduce the site noise to a minimum, additional screening around the noise sensitive equipment and the site perimeter is proposed. Public Health and Protection does not dispute the findings of the noise survey and concurs that the noise mitigation measures are necessary and shall be maintained in place for the duration of the works.

In terms of vibration, the applicant considers the perceived risk to be negligible on the basis of previous drilling operations near buildings and industrial premises, the presence of soft overburden that will absorb early stage drilling at the site, and the cushioning of drill bit vibration by the overburden and its distribution through low ground pressure tracks on the drill rig.

Although Public Health and Protection has not offered any adverse comment in respect of vibration, the Royal Mint has commented that vibration can be dependant on issues such as the type of drilling method used, therefore consider it appropriate that a drilling methodology be agreed and controlled by way of condition. The applicant is steadfastly of the view that any vibration risk to The Royal Mint is effectively nil, for the reasons above, though would not object to a precautionary approach through the addition of a condition requiring monitoring and assessment of vibration from the operations to undertaking in accordance with an agreed methodology. Such a condition will provide the safeguards sought by the Royal Mint.

Taking all of the above into consideration it is concluded the proposal would not harm the amenity and operations of the occupants of the nearest neighbouring residential and commercial properties from noise and vibration, subject to the safeguards discussed being put in place.

Other matters

Site stability

Members of the public have questioned whether ground conditions might be affected by the proposed development, with particular reference to the risk of earth tremors said to be associated with this kind of proposal. The applicant states that there are no recorded mine workings in the immediate area of the site, the nearest workings being at Cwm Colliery located 08.km east of the site and Coedely Colliery 4.2km north west of the site. There is no evidence to suggest these will have any impact on the proposed drilling operations. Moreover, there is no evidence to conclude that exploratory drilling (as opposed to hydraulic fracturing) at this location will increase the risk of earth tremors and other seismic events. Consequently, it is considered there are no grounds to withhold planning permission for reason that the development might pose an unacceptable risk to ground conditions at this location.

Consequences for a Control of Major Accident Hazards (COMAH) site

The drilling site lies within 500 metres of The Royal Mint, which is a designated COMAH site, on account of the hazardous substances held at the premises. The Royal Mint also is a major employer and contributor to the UK and global economy. In their representations the Royal Mint draw attention to the relationship of its premises and operations to the drilling site and the sensitive nature of the use of the Royal Mint, matters which do not appear to have been taken into account by the applicant.

In response to these concerns it is important to consider the following point. Firstly, the proposed drilling is for gas exploration only: it does not involve either directional drilling or ground stimulation (such as 'fracking') therefore will not encroach nearer to The Royal Mint from the drilling site itself. Moreover, the risks to the Royal Mint from drilling vibration are perceived as negligible; nevertheless, a condition is capable of being added to a planning permission requiring monitoring and assessment of vibrations from the operations to be carried out in accordance with a specified vibration methodology, which would safeguard the sensitivities of the Royal Mint. Secondly, the Health and Safety Executive has been consulted about this application, on account of the Mint's COMAH designation, and has not advised, on safety grounds, against the granting of planning permission.

It is considered, therefore, the relationship of the drilling site to The Royal Mint and the consequences of the proposals for the sensitivities of The Royal Mint have been fully considered and, where necessary, is capable of being adequately safeguarded.

The need for gas exploration

Some members of the public have questioned the need to explore for gas reserves at all, citing gas as a fossil fuel that contributes to greenhouse gas emissions and climate change. Nevertheless, the Welsh Government's 'Energy Wales: A Low Carbon Transition' states that gas will be a key transitional fuel because greenhouse emissions from gas are significantly less than coal subject to the method of extraction. It goes on to note that gas is a flexible, responsive and reliable source of energy which can play a key role in the transition to a genuinely low carbon energy system.

Consequences for safeguarding mineral reserves

The application is in an area of known sandstone resource safeguarded by LDP Policy AW14 from any development which would unnecessarily hinder extraction of that resource. The identification of safeguarding areas for minerals does not carry any presumption that planning permission would be granted for their extraction as other issues may well prevail, for example, proximity to residential areas, ecological constraints and visual impacts. Notwithstanding, permanent development within the safeguarding areas is normally considered unsuitable and generally is to be avoided. However, given that Pennant Sandstone covers approximately 70% of the surface area of Rhondda Cynon Taf, and the temporary nature of the proposed exploratory drilling, and the very small site area, the proposal is unlikely to significantly diminish the resource, therefore does not bring the development into conflict with Policy AW14.

Miscellaneous matters

Members of the public have questioned whether the applicant company has the resources to fund the proposal in the manner proposed. This is not a matter that material to the consideration of the planning application, as

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planning permission inures for the benefit of the land; therefore the specific characteristics of the applicant are seldom a relevant consideration.

Finally, members of the public have questioned whether the application has been the subject of sufficient publicity. In this regard it is advised the proposal was the subject of notices posted on site and on Llantrisant Town Council notice boards, and the subject of a press notice, therefore the statutory obligations in relation to publicity of planning applications have been met in this case.

Conclusion

Having regard to all of the considerations discussed above and to the representations made in this case, it is concluded that there are no land-use planning reasons to withhold planning permission for exploratory drilling operations for unconventional gas reserves at this site. Therefore, planning permission is recommended subject to the conditions set out below.

RECOMMENDATION: Grant

1. The development hereby permitted shall begin not later than five years from the date of this permission.

Reason: To comply with Sections 91 and 93 of the Town and Country Planning Act 1990.

2. The buildings and works hereby permitted shall be removed and the use shall be discontinued and the land restored to its former condition, or any restoration scheme that may first be agreed in writing with the Local Planning Authority, within 12 months of the date of commencement of development. Written notification of the date of commencement of development shall be submitted to the Local Planning Authority not less than 14 days prior to the commencement of activities on site.

Reason: To specify a reasonable timescale for this temporary permission to allow a period of exploration to take place and to ensure the site is returned to its former conditions in the interests of visual amenity in accordance with Policy AW 5 of the Rhondda Cynon Taf Local Development Plan.

3. Notwithstanding the submitted documents, prior to any drilling taking place, a detailed working method statement for the drilling operation, to include methods to minimise the risk of the loss of drilling fluid to ground water resources during the drilling process and monitoring for any loss of drilling fluid, as well as measures for the collection and disposal of spilt drilling fluid, shall be submitted to and approved in writing by the local planning authority. All operations shall thereafter be carried out in accordance with the approved details.

Reason: In order to prevent pollution of the water environment in

accordance with Policy AW10 of the Rhondda Cynon Taf Local Development Plan.

4. The development hereby permitted shall not be commenced until such time as a scheme for the storage of oils/fuels/chemicals has been submitted to and approved in writing by the Local Planning Authority.

Reason: In order to prevent pollution of the water environment in accordance with Policy AW 10 of the Rhondda Cynon Taf Local Development Plan.

5. Notwithstanding the submitted documents, full details of a scheme for the disposal of foul and surface water drainage shall be submitted to and approved in writing by the Local Planning Authority and the approved scheme shall be fully implemented prior to any drilling operations or site preparation taking place. The submitted scheme shall include:

- i) Proposal for the treatment and disposal of suspended solids from surface water runoff;
- ii) Proposals for the treatment and removal of suspended solids from water (groundwater and drilling fluids) abstracted from the ground during drilling and pumping works;
- iii) Emergency procedures to be implemented where any failure results in the pollution of controlled waters.

Reason: In order to prevent pollution of the water environment in accordance with Policy AW10 of the Rhondda Cynon Taf Local Development Plan.

6. Monitoring and assessment of vibration from the operations shall be carried out in accordance with the vibration methodology below unless otherwise agreed in writing with the Local Planning Authority.

- i) An acceptable datum level of vibration will be agreed with the Local Planning Authority prior to drilling commencing.
- ii) The inherent vibration of the drill rig will be monitored before transporting to site.
- iii) Normal prevailing vibration over the drilling area will be measured at the nearest residential and commercial properties before drilling commences.
- iv) From the commencement of the drilling operation, vibration will initially be continuously monitored without interruption; at times when the drill is both in use and not in use. Monitoring will take place at both the nearest residential and commercial properties. The duration of continuous monitoring will be agreed with the Local Planning Authority once representative vibration data has been compiled and assessed.
- v) Once the recorded vibration level approaches 10% below the agreed datum level, drilling will cease.

Reason: To safeguard the amenity of neighbouring residential properties

and the operations of neighbouring commercial properties in accordance with Policy AW 10 of the Rhondda Cynon Taf Local Development Plan.

7. Any site lighting shall be carried out strictly in accordance with the submitted documents and plans, unless otherwise agreed in writing with Local Planning Authority.

Reason: To ensure there is no disturbance to wildlife in accordance with Policy AW8 of the Rhondda Cynon Taf Local Development Plan.

8. Before the development is brought into beneficial use the means of access, together with the vision splays, parking, hardstanding and turning facilities, shall be laid out and constructed in accordance with approved plans and shall be retained throughout the duration of the works.

Reason: In the interests of highway safety in accordance with Policy AW5 of the Rhondda Cynon Taf Local Development Plan.

9. The works to prepare the site for drilling, construct and dismantle the drill and associated equipment, and restore the site shall only be carried out between the hours of 08:00 to 18:00 hours on Mondays to Fridays and between the hours of 08.00 to 13.00 on Saturdays and at no time on Sundays and Public Holidays.

Reason: To safeguard the amenities of neighbouring properties in accordance with Policy AW5 of the Rhondda Cynon Taf Local Development Plan.

10. The noise mitigation scheme submitted as part of the application shall be implemented before the commencement of drilling operations and shall be maintained thereafter in accordance with the scheme for the duration of the works.

Reason: To safeguard the amenities of neighbouring properties in accordance with Policy AW5 of the Rhondda Cynon Taf Local Development Plan.

11. Before any work is commenced on site, including site works of any description, each of the trees to be retained shall be securely fenced off by a chestnut paling or similar fence erected in a circle round each tree to coincide with the extremity of the canopy of the tree. Within the areas so fenced off the existing ground level shall be neither raised nor lowered, and no materials or temporary buildings or surplus soil of any kind shall be placed or stored thereon. If any trenches for services are required in the fenced-off areas they shall be excavated and back-filled by hand and any tree roots encountered with a diameter of 5cms or more shall be left unsevered.

Reason: To protect the existing trees on the site during the course of site set-up, drilling operations and restoration works in the interests of amenity

in accordance with Policies AW5 and AW6 of the Rhondda Cynon Taf Local Development Plan.

12. Prior to the commencement of development details of a scheme and timescale for the replacement of boundary hedging removed on the north side of the site access shall be submitted to and approved by the Local Planning Authority. The replacement of the boundary hedgerow shall be carried out in accordance with the approved scheme.

Reason: To ensure the adequate restoration of the site in the interests of visual amenity and in accordance with Policy AW 5 of the Rhondda Cynon Taf Local Development Plan.

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Appendix B

RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL

MUNICIPAL YEAR 2013-2014

DEVELOPMENT CONTROL COMMITTEE

1 AUGUST 2013

REPORT OF THE DIRECTOR LEGAL AND DEMOCRATIC SERVICES

Agenda Item No.4(4)
SITE MEETING
APPLICATION NO. 12/1253 – DRILL AN EXPLORATION BOREHOLE TO TEST FOR UNCONVENTIONAL GAS RESERVES IN THE WESTPHALIAN AND NAMURIAN STRATA – FIELD ON THE LEFT HAND SIDE OF PANTYBRAD ROAD, NORTH OF LLANTRISANT

Author: Mrs.Z.Maisey, Principal Officer – Committee Services

1. PURPOSE OF THE REPORT

To consider the outcome of the site inspection in respect of the above-mentioned proposal and to determine the application, as outlined in the report of the Service Director, Planning attached as Appendix 1.

2. RECOMMENDATION

To approve the application in accordance with the recommendation of the Service Director, Planning.

3. BACKGROUND

3.1 In accordance with Minute No. 23(1) (Development Control Committee, 4 July 2013) a site inspection was undertaken on Wednesday, 17 July 2013 to consider the planning and environmental impact of the proposal.

3.2 The meeting was attended by the Chairman and Vice-Chairman of the Development Control Committee (County Borough Councillors R.B.McDonald and D.Weeks respectively) and County Borough Councillor E.Webster in consultation with the Local Member for Llantrisant (County Borough Councillor G.Holmes). County Borough Councillor R.W.Smith and P.Wasley were in attendance as observers.

Development Control Committee Agenda - 15 August 2013

- 3.3 The Development Control Officer informed Members that planning permission was sought to drill one exploratory borehole to test for unconventional gas reserves in the Westphalian and Namurian strata on land in a field west of Pantybrad Road, north of Llantrisant. The Development Control Officer pointed out that the application was for exploration works only and would not entail any ground stimulation more familiarly known as "fracking", nor did it involve directional drilling. Concerns about fracking and the perceived consequences of it were not material in the determination of the application. If the testing was successful an additional planning application for longer term pilot production would be submitted.
- 3.4 Consent was sought for a temporary period of one year during which time establishment and site clearance would last 4 weeks, drilling and associated operations – 8 weeks, laboratory testing 4 weeks and gas testing 36 weeks. Hours of work during site establishment and site clearance would be from 08:00 – 18:00 hours and during the drilling period – 24 hours, seven days a week.
- 3.6 No objections to the proposal had been raised by the Transportation Section, Land Reclamation and Engineering Section, Public health & Protection, Natural Resources Wales, the Parks and Countryside Section or Dwr Cymru/Welsh Water subject to conditions.
- 3.7 Members enquired as to whether the applicant had taken account of the presence of old mine workings/shafts in the area and in response, the Development Control Officer stated he would seek clarification from the applicant. The Development Control Officer informed Members that the applicant would require permission from the Coal Authority to drill through coal seams which would be separate to the planning process.
- 3.8 Members also enquired whether any chemicals would be used in the drilling process and the Development Control Officer stated that drilling fluid would be used and whilst its chemical composition was unknown, where it had been used in other projects, it had very limited effect on ground water contamination. It was noted that the applicant proposed to remove any fluid from the site by tanker and did not anticipate any seepage into the ground arising from the drilling process as relevant safety measures would be put in place.
- 3.9 The Development Control Officer informed Members that eight "late" emails had been received in relation to the application since his original report (Appendix 1) was compiled. The "late" emails primarily dealt with the same issues already raised but there were three extra issues which the Officer responded to as follows:

Development Control Committee Agenda - 15 August 2013

- Representations had been made that the proposal required other permits to be applied for by the applicant but these were matters governed by other legislation and not planning;
 - A question had been raised as to where the millions of gallons of water would come from and where the frack fluid would be disposed of – this application was for exploration and not extraction and this question would relate to a potential future application;
 - A question was raised as to whether any of the jobs created would be local - the answer was unknown.
- 3.10 Members viewed the application site - an agricultural field covering an area of 0.14 hectares bounded by headgerows/trees and surrounded by other agricultural fields. Access to the site would be via an existing gateway off Pantybrad Road which would be widened to improve accessibility and vision splays. Pantybrad Road is a sub-standard rural road that extends from Tonyrefail to Llantrisant.
- 3.11 The Development Control Officer informed Members that having regard to all of the considerations outlined in the report (Appendix 1) and to the representations made in this case, it was concluded that there were no land-use planning reasons to withhold planning permission for exploratory drilling operations for unconventional gas reserves at this site.
- 3.12 Members asked that when the application is reported to the Development Control Committee that drawings and photographs be made available showing the site location and landscape together with details of the proposed operation and measures for environmental protection.

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Appendix C

Dear Phil

Abandoned Mine Workings

From the records held by Coastal Oil and Gas Limited no mine workings are recorded under the site. On Monday 19th August we visited the Mining Records Office of the Coal Authority in Mansfield to look at the mine workings around the drilling site. Following a search by their staff no workings are recorded, the search area was then widened to locate the nearest recorded workings, these are shown in figure 1 below.

There are workings from two collieries east and west of the site.

- Cwm Colliery workings are located 0.8km east of the site
- Coedely Colliery workings are located 0.4km Northwest of the site

The nearest workings are seen in the 2ft9 and 6ft seam from Coedely workings 400m to the west.

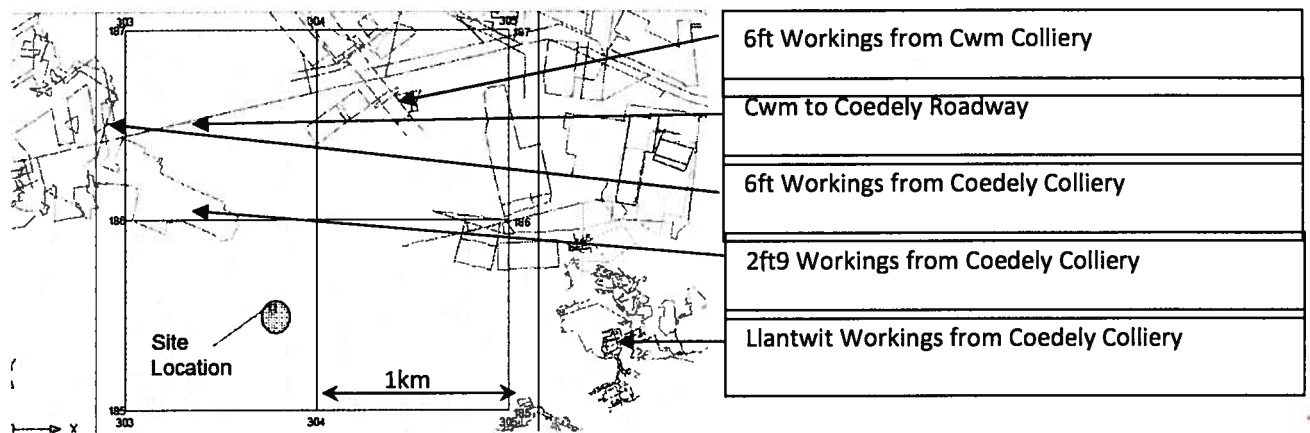


Figure 1: The location of these workings around the proposed Llantrisant site.

Coastal Oil and Gas Limited has copies of the detailed mine plans showing the comprehensive locations of the mine workings in relation to the site and this shows that the nearest mine workings are over 400m from the proposed site in the Two Feet Nine Seam from Coedely Colliery. As Coedely Colliery closed late in the development of the coalfield (1986) the mine plans are clear and have been mapped on an OS grid, this makes the location of the plans and the proposed borehole location very reliable.

During the planning meeting there were a number of mentions of Ynysmaerdy Colliery – also known as Llantrisant Colliery. Coastal Oil and Gas Limited have the mining records for this colliery and they have been digitized into the geological model.

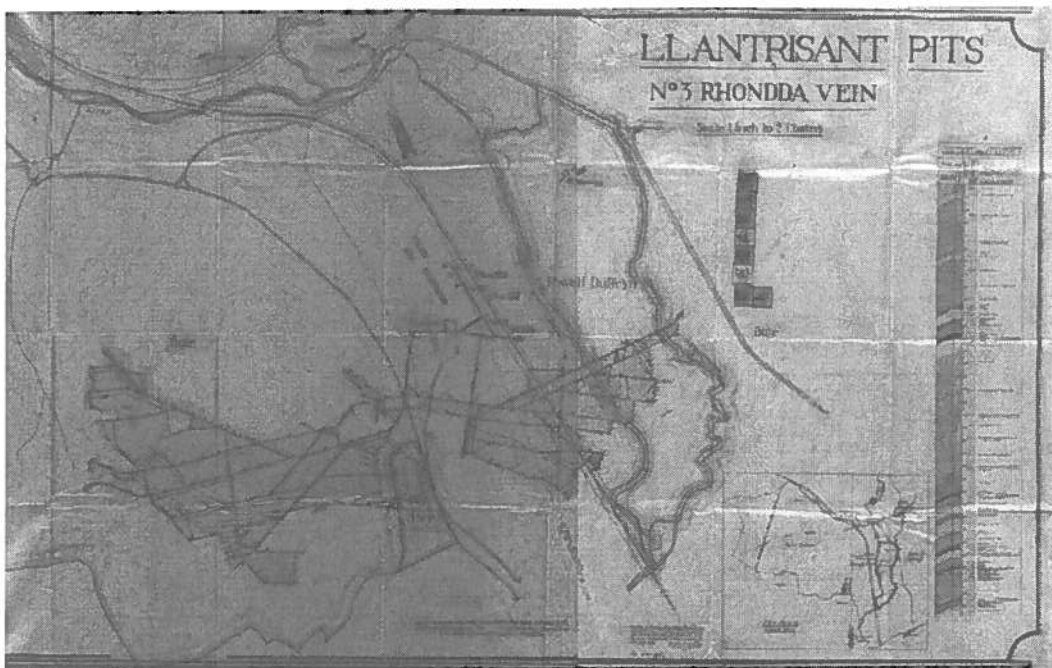


Figure 2: Mine Plans around Llantrisant (Ynysmardy Colliery)

This colliery was closed following an explosion at the surface in 1941. The shafts were sunk in 1923, the colliery was open less than 20 years and as a result the mine workings are not very extensive and only in 3 seams.



Figure 3: Location of mine workings from Llantrisant Colliery in relation to the surface. The different colours represent separate seams.

As seen in Figure 3 the mine workings from Llantrisant Colliery workings extend around 500m west under the Hospital and 1000m east under Llantrisant Forest.

Possibility of Unrecorded mine workings

For there to be the possibility of un-recorded mine workings then they would be old (pre 1873). After this date all mine workings had by law to be recorded and sent to the mine inspector when the mine was finally abandoned.

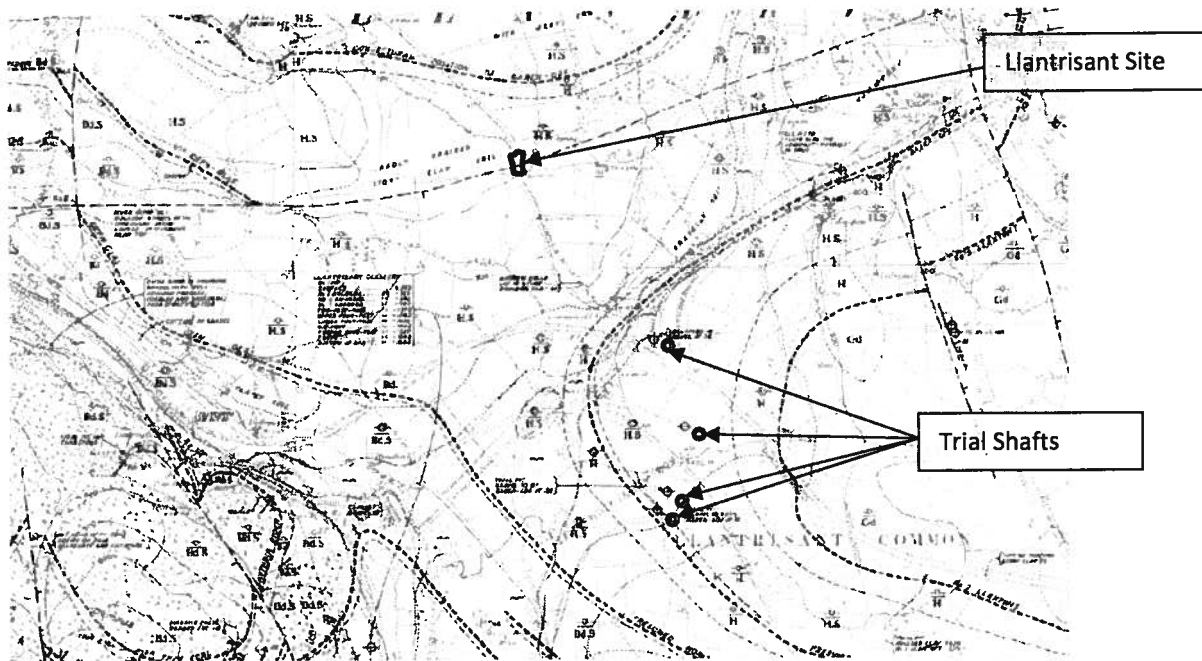


Figure 4: Detailed geology around Llantrisant

As you can see from the Figure 4 above there are no coal seams that out crop in the fields south of the site where a possible mine entry would be.

There are noted on the detailed geological maps 4 trial shafts around the Llantrisant Business Park the deepest of these is 136ft (41.5m) and only two of these noted coal. It is very unlikely that there are workings under the Royal Mint.

Also the Rhiwfelin Borehole drilled near to the proposed Llantrisant borehole did not encounter any mine workings.

In the unlikely event that any unrecorded workings are located they are likely to be at very shallow depths as they would have been mined prior to the late 19 century and before any mechanised mining, the workings would be no more than a metre high as the coal seams are thin in this area. There would also be evidence of adits in the fields surrounding. The working method would have been by pillar and stall, so there is less chance to drilling in to a working void. If the unrecorded workings were filled with water, this water would be at low pressure and the density of the drilling fluid would reduce the ingress of water, and the volume of water would prevent a major loss of drilling fluid. The amount of fluid in the borehole would be no more than 5 cubic metres in any case (this would be the volume of the borehole at this depth). Any void encountered would be noticed immediately by the crew as there would be a change in the drilling returns either with an increase in fluid returns or a decrease the drilling would cease so the reasons for the change could be investigated. If old mine workings were

encountered, additional steel casing could be placed in the borehole and using cement to seal the bottom section in place and additional cement poured through the top of the well to seal the upper section. Then drilling can continue as required. If the mine workings were dry the loss of a small amount of fluid would immediately be noticed and the same procedure as above would apply.

In the event of this happening Coastal Oil and Gas Limited would contact Natural Resources Wales and the Coal Authority.

LOCAL GOVERNMENT ACT 1972

as amended by

LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985

RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL

LIST OF BACKGROUND PAPERS

DEVELOPMENT CONTROL COMMITTEE

3 OCTOBER 2013

REPORT OF: SERVICE DIRECTOR PLANNING

REPORT

**APPLICATION NO: 12/1253 - DRILL
AN EXPLORATORY BOREHOLE TO
TEST FOR UNCONVENTIONAL
GAS RESERVES IN THE
WESTPHALIAN AND NAMURIAN
STRATA, FIELD ON LEFT HAND
SIDE OF PANTYBRAD ROAD,
NORTH OF LLANTRISANT**

OFFICER TO CONTACT

**MR P BRISTOW
(Tel. No. 01443 494763)**

See Relevant Application File

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