

**EPP4(S)**

**APPEAL BY ISLAND GAS LTD, PORTSIDE**

**ELLESMERE PORT**

**APPEAL REFERENCE APP/A0665/W/18/3207952**

## **SOCIAL HARM**

**SUMMARY PROOF OF EVIDENCE**

of

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**EXPERIENCE**

My name is Anna Szolucha. I am a social scientist. I have a Masters (Hons.) degree in International Relations/Political Science from the University of St Andrews and an interdisciplinary doctorate from the National University of Ireland, Maynooth. I have nine years of full-time equivalent research experience. I am currently a full-time Postdoctoral Research Fellow at the Department of Social Sciences, Northumbria University in Newcastle; and part of a new research programme – “Unconventional Hydrocarbons in the UK Energy System: Environmental & socio-economic impacts & processes” – funded by the Natural Environment Research Council (NERC) and the Economic and Social Research Council (ESRC). Our project is one of seven research consortia funded under this £8m programme which aims to provide an independent scientific evidence base to understand potential environmental and socio-economic impacts of unconventional hydrocarbon development.

I became interested in unconventional gas development in 2011 and began studying it from a social perspective in 2013. Since 2015 I have been conducting full-time research on the impacts and history of shale gas development in Lancashire, UK and south-east Poland. In addition to academic articles, books, book chapters and an edited collection, I am also the author of the first social impacts assessment of shale gas development in the UK. I regularly present my research findings at international academic conferences, most recently at the conference of the Association of Social Anthropologists of the UK and Commonwealth in Oxford and a conference organised by the Petroleum Group of the Geological Society of London. I am also a recipient of multiple European and national academic scholarships, grants and research awards, most recently the Marie Skłodowska-Curie Actions award of the European Commission for ‘Communicating Science’ about the impacts of shale gas developments.

In order to prepare this proof of evidence, I visited the proposed site and the surrounding area and had two group discussions with members of the local communities.

## **SUMMARY**

### **1 Social impacts constitute an integral and important part of land-use planning**

- 1.1 National and local planning policy make extensive reference to the significance of social impacts in planning decision-making. In my main Proof I set out the relevant parts of the Local Plan (Part One) of Chester West and Chester; the SPD on Oil and Gas Exploration and the NPPF. The Legislator has afforded equal relevance to the economic, environmental and social impacts of development; provisions to this effect were introduced in the NPPF and are reflected in the Local Plan as well as the associated guidance. Nevertheless, the Appellant's interest in the potential environmental and economic impacts of the proposed development has not been matched by the same level of attention in the interconnected area of social effects.
- 1.2 The exclusion of important elements of the social impacts of the gas appraisal project may have profound consequences for the assessment of whether, on balance, the impacts associated with the proposed development should be considered acceptable and sustainable in Ellesmere Port.

### **2 Local sustainability principles and inequalities - the social context and significant social impacts of the proposed development**

- 2.1 Ellesmere Port used to be a major centre of manufacturing, and multiple industries in the area have been in existence for a long time. Many of these industries are related to the chemical and petrochemical sectors, including Stanlow oil refinery and petrochemical complex.
- 2.2 The town's high industrial density and poor record in air quality have been associated with establishing an Air Quality Management Area in Ellesmere Port. The town consistently ranks among the most deprived areas in Cheshire West and Chester across a number of deprivation factors. Over 80% of Ellesmere Port Town

(ward) residents live in areas of multiple deprivation (compared to approximately 20% for England). In the Rossmore ward, where the appeal site is located, the percentage of residents with bad or very bad health is almost double the borough's average.

- 2.3 The industrial history of Ellesmere Port, the problems with deprivation as well as its image are acknowledged throughout the Local Plan. They form the basis for a local vision of moving away from the past by promoting regeneration and development as well as efforts aimed at building the image of the town as a "prosperous area". Policy STRAT 4 encourages a better use of the designated industrial and manufacturing sites, primarily for the purposes of creating significant employment opportunities for residents and attracting inward investment. The policy does not reflect a predisposition to approve industrial development in areas with prior industry. Rather, it calls for a qualitative shift in the kind of industries that are invited to operate in Ellesmere Port. It is expected that new industry will change its approach to the social impacts that its activity generates.
- 2.4 In the Statement of Case, the Appellant proposes a few interpretations of the Council's reason for refusal. By treating sustainability as an abstract concept and focusing on the physical impact of climate change, however, the Appellant fails to account for the local specificity of sustainability principles and the implications of climate change decision-making for the local livelihood, social cohesion and inclusion of communities in and around Ellesmere Port.
- 2.5 Clustering industry in an area of poor environmental quality and social deprivation may perpetuate an unequal distribution of adverse effects of development. In my view, policy STRAT 1 of the Local Plan addresses these implications of inequality and deprivation in the area. At the meeting of the CWAC Planning Committee on 25 January, the vast majority of Councillors and residents were of the opinion that higher standards needed to be applied in Ellesmere Port.

- 2.6 International and scientific bodies have identified socioeconomic inequality and deprivation as one of the key factors in planning for mitigating and adapting to climate change. Hence, reducing inequality and deprivation and improving social cohesion are the most important social-based measures for the mitigation and adaptation to climate change. Distributed renewable energy generation is also widely regarded as a mitigation measure that helps to reduce social inequalities and has the potential to empower local communities. These priorities are embedded in policy STRAT 1. The Appellant does not address the problem of local inequalities and does not seem to recognise their role in contributing to the local mitigation and adaptation efforts concerning climate change.
- 2.7 There is no provision in the NPPF or the Local Plan (Part One) which would suggest that the temporary nature of the proposed development (appraisal process of 18 weeks with a potential delay of operations of up to 3 years) may absolve the decision-makers and the developers from assessing the risks of cumulative and synergistic failure to address climate change in the near term. The Appellant does not seem to recognise the societal importance of the near-term planning for climate change mitigation and adaptation.

### **3 Social impacts of the proposed gas development are significant and multifaceted**

- 3.1 Assessing the social impacts of the proposed development means examining the ways in which social, psychological, health and political change processes associated with this development are already impacting and may impact on the daily lives, beliefs, livelihoods and community dynamics in Ellesmere Port. This definition of social impacts adopts and builds on some commonly accepted principles and best practices in social impact research, particularly those that have been formulated by the International Association for Impact Assessment.
- 3.2 Social impacts include perceived impacts. These are by definition real and relevant social impacts because they reflect a person's understanding of risk. Furthermore, perceived impacts are real because people tend to respond to

impulses according to their own perceptions, fears and beliefs. People's understanding of risk can trigger a physiological response and hence, is widely recognised as a mediator of many health impacts. Stress and anxiety are real social impacts and they are not merely individual or subjective but may contribute to collective trauma caused by a common experience of unconventional oil and gas development. Social dynamics concerning trust, credibility and public engagement are also crucial for assessing social impacts and risks.

- 3.3 Industrial clusters already tend to be more concentrated in more deprived areas, leading to the phenomenon known as "sacrifice zones". In a situation when equity appraisal of the proposed development is lacking, the socially unequal distribution of risk raises particular challenges for democratic decision-making. In this case, the decision reached by the Council Planning Committee is quite rightly regarded as a corrective mechanism through which distributional inequality was brought to bear on the narrow parameters of technical risk assessment. The residents' representations to the Council as well as the discussion at the committee meeting in January 2018 reflect the fact that the proposed development was perceived as unfair from a social point of view.
- 3.4 In particular, the potential economic benefits of the proposed development were not seen to balance with or compensate for its potential adverse impacts. The residents and the Councillors did not seem to consider that "informed consent" was exercised at the time when the Appellant was granted its extant permission to explore and extract CBM; they also did not feel that the information provided by the Appellant regarding the current application was sufficient nor that the company was entirely open about its plans in Ellesmere Port.
- 3.5 One of the most important equity implications of industry clustering in and around Ellesmere Port are health, including the mental health, impacts of gas development. Industrial activity can be classed as a local stressor which causes anxiety, fear, stress and fatigue. A cumulation of stressors is likely to have a more negative effect on low-income classes, those with health issues and those who are

unhappy about the new development, which are characteristics that are particularly pertinent in Ellesmere Port.

- 3.6 The local Integrated Strategic Needs Assessment (2014) shows that residents of Ellesmere Port fared worst in the borough in relation to feeling optimistic about the future and feeling useful. Additionally, they were significantly less likely to say that their area had improved over the last 2 years. The proposed site is within 1 kilometre from residential areas, several schools, a hotel and a children's play centre as well as the nearest motorway junction, which suggests that residents are very likely to become aware of the shale gas activities once the site is in operation. Depending on their social position, health and understanding of risk, they may also experience various levels of stress and anxiety.
- 3.7 The often highly specialised nature of the industries in Ellesmere Port and the wider area means that many of the jobs are high-skilled and staffed by commuting workers rather than local residents. Manufacturing jobs are mostly male-dominated. The local employment dynamic has led to the perception that "the industries are not catering to local people." Some residents have also raised concerns about the economic benefits of the proposed development, as one of them put it: "I haven't seen any jobs, anything for me, or the people who live on my street."
- 3.8 The Appellant does not seem to enjoy a good reputation in the area and its public engagement record is poor. Some residents remember that the company secured an eviction order against a "community protection camp" at the Appellant's previous site in Upton, only to announce shortly after the eviction was carried out that it was not going to drill for CBM there. The eviction, however, required significant police engagement and generated substantial costs. In the eyes of residents, the current application, which concerns shale gas rather than CBM, is another example of how the company has misrepresented its real intentions to the public. Many engaged residents also feel that consultations carried out by the Appellant were inadequate and did not address their questions and concerns. The

residents lack confidence in the company's willingness to conduct its activities in Ellesmere Port in a safe and open manner.

- 3.9 Previous research on the impacts of the planning process in Lancashire showed that local residents experienced a form of collective trauma related to the proposed shale gas development in the area, even before any construction and hydraulic fracturing began. Local residents in Lancashire spoke of experiencing a profound sense of powerlessness and depression, a sense of loss, fear, betrayal, guilt, anger. Similar symptoms of collective trauma are already emerging in relation to the proposed development in Ellesmere Port. These are the social harms that may often go unnoticed by the planning system despite being a material consideration in planning decision-making.
- 3.10 The strained relationship between residents and the company is also very likely to sow the seeds for a wider social conflict once the shale gas activities at the site commence.
- 3.11 The experiences from Balcombe, Barton Moss, Kirby Misperton and Preston New Road testify to an array of adverse social and community impacts when a company proceeds with an unwanted development, including: collective trauma, increased policing, an atmosphere of heightened insecurity and increased community disruption. These negative impacts are more widespread and outstrip positive effects of unconventional developments such as: local donations by oil and gas companies, community fund payments or benefits to local subcontractors, which are much more concentrated and publicly less visible.
- 3.12 The likely local conflict will result in the residents' dissatisfaction with the political system, with long-term effects concerning voting behaviour, protest and trust in the government. These experiences may leave a long-lasting legacy of damaged relationships between communities and the local police. The social impacts of the proposed development are, therefore, unlikely to be negligible and short in duration.

#### **4 Public distrust of the proposed development and multiple definitions of fracking in the UK**

- 4.1 There are currently multiple definitions of hydraulic fracturing and unconventional gas development. In my proof of evidence, I explain the role that the uncertainty in using these multiple definitions plays in generating significant public distrust and opposition, as has occurred in relation to this appeal. The Appellant proposes to use diluted acid to re-establish natural flow in the gas formation. This, however, may constitute fracking according to the local definition spelled out in the SPD.
- 4.2 The local community has legitimate reasons to consider that this development may involve fracking. This amplifies distrust of the Appellant and creates a local perception that the company is going to use hydraulic fracturing but is trying to avoid fracking regulations.

#### **5 Conclusion**

- 5.1 The Appellant has not considered or addressed many of the social effects of the proposed development and has not shown that unacceptable adverse social impacts would be mitigated or would not arise in the course of its operations. In addition to the direct social effects of the proposed development, its social aspects are also important mediating factors for health and environmental impacts. By failing to include the social context of the proposed industrial operations, the application becomes abstract in character, which precludes a more complete understanding of how risk factors operate in the reality of social environments. This is particularly so in relation to the social impact of climate change mitigation and adaptation.
- 5.2 Ellesmere Port is already a socially vulnerable area. The town consistently ranks among the most deprived areas in Cheshire West and Chester across a number of deprivation factors. The social impacts of the proposed development are

significant and multifaceted. The uncertainty over the exact type of the development (conventional/unconventional) and the use of hydraulic fracturing exacerbates many of the social impacts instead of abating risk perceptions.

- 5.3 When the social impacts are properly taken into account, it is clear that the development is not sustainable, because it fails to comply with the social element of sustainability. This is reflected in the lack of compliance with STRAT 1.

**Dr Anna Szolucha**

**December 2018**