

## Jane Moseley

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**From:** Nigel Gould  
**Sent:** 03 January 2014 15:51  
**To:** Jane Moseley  
**Cc:** Chris Hird  
**Subject:** RE: 2 of 3. Lower Stumble - Temporary Flow Test, Update. 03 01 14  
**Attachments:** 2 02 01 14 LS Flow Test App Plan Statement. ISSUE. NG AQ.PDF

**Importance:** High

Jane,

Further to my first email response to you on the 23/12/13 I attach the revised statement which takes on board the comments raised in your email of the 13<sup>th</sup> December and at our meeting on the same day. You have already had our agreement to the revised development description and the forms have been amended to reflect this and sent over. Similarly you have had the revised figures 1, 2 and 3. The changes to the statement should be self-evident but if you have any questions please let me know.

I have a few comments below in your original email. Could you confirm if the application has been validated and registered and when it will go live?

Kind regards

Nigel

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**From:** Jane Moseley  
**Sent:** 23 December 2013 14:22  
**To:** Nigel Gould  
**Subject:** RE: 1 of 3. Lower Stumble - Temporary Flow Test, Update. 23 12 13

Nigel

Thanks for the amended forms and figures. I will await the further information for validation on 2 January.

Kind regards  
Jane.

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[Jane Moseley](#) | Principal Planner, Communities & Infrastructure, [West Sussex County Council](#) | Location: Strategic Planning Business Unit, 2nd Floor Northleigh, County Hall, Chichester, PO19 1RH

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**From:** Nigel Gould  
**Sent:** 23 December 2013 14:09  
**To:** Jane Moseley  
**Subject:** 1 of 3. Lower Stumble - Temporary Flow Test, Update. 23 12 13

Jane,

I attach the amended forms and figures 1-3 which address your comments in the first heading below and partly respond to your comments in the second heading – Plans.

To confirm I will send a revised copy of the planning statement that takes on board the remainder of your comments (2 of 3) and the remaining plans (3 of 3) on the 2<sup>nd</sup> January if that is ok?

Regards

Nigel

Nigel

I write in response to the above application, received on 5 December 2013. In order for me to be able to validate the application I require the following:

Application Form:

- Description: I consider the existing description is unclear. I therefore propose that it is amended to read:  
*“Temporary permission for exploration and appraisal comprising the flow testing and monitoring of the existing hydrocarbon lateral borehole along with site security fencing, the provision of an enclosed testing flare and site restoration”*  
I consider the application description should include reference to exploration and appraisal as the government oil and gas guidance (DCLG July 2013) makes it clear that planning permission is required for each phase so it should be clear which the application relates to. I note that in Section 3.2 of the application you refer to the application relating to ‘exploration’ only. I do not agree and consider that this puts the application at risk of challenge.

The government’s guidance makes it clear (paragraph 11) that the exploratory phase seeks to establish whether hydrocarbons are present. The appraisal phase follows once the presence of oil/gas has been proven, and establishes the extent of the deposit and whether it can be economically exploited (paragraph 16). Cuadrilla has confirmed in the press and to WSCC that oil/gas is present. Therefore I consider they have moved on to the appraisal stage, or possibly exploration and appraisal as the works proposed could be considered to include some elements of exploration. I understand that this may be different to the way the phrases are used in the oil industry, but we are reliant on DCLG’s definitions.

I have removed referenced to the site address as this will be displayed under/above the description on any consultation/information related to the application so does not need to be in the description.

Plans:

- Testing Site Layout Plan: please indicate the location of the heras fencing mentioned in the application, and differentiate this from the existing fencing. Please show any gates which may be provided; and the location of the generator.
- Please provide a Lighting Plan indicating the location, type and direction of any lighting. **The lighting will be specific to the area around the rig, as the exact specification of the rig is not known the lighting scheme relating to it cannot be finalised. Operations will be restricted to daylight hours as far as possible, it is only the mobilisation and set up of equipment that may require a small amount of work in evenings. Should further conditions above those attached to the 2010 permission, these could be submitted for approval/discharge prior to commencement – as detailed in the statement attached**
- Fig 01 – Red Line Plan: please ‘clean’ this drawing as it currently includes sporadic letters and squared blank areas where it appears part of the map may have been removed.
- Fig 02 – Site Location Plan: please show the full extent of the red line, including the site access and lateral well.
- Please show the red line boundary on the restoration plan (drawing no. 62087/001). **The revised figures 1, 2 and 3 have been plotted accurately to show the red line including the borehole. The restoration plan is at a large scale to show the detail required for this final**

stage. We are not able to accurately plot the red line on a map of this scale. The plan certainly shows the detailed required for the restoration at an appropriate scale and I would not like to reduce the size. I feel the plan is fit for purpose and can be referenced as one of the approved plans on any decision notice, therefore with respect I do not propose to make any changes to this plan.

- Please provide an additional plan(s) showing at least two site sections, including through the cellar. If the exact equipment to be on site has yet to be determined, a 'worst case scenario' should be used for the scale of equipment. Whilst the height of the rig is detailed in the statement we have not been able to acquire across section, even in draft form of a suitable rig. I would therefore suggest that the details are submitted with the notification of the start of works i.e. when the exact specification of the rig is known.

#### Supporting Statement:

- Section 3.2: as noted above, I consider this should be updated to better reflect the DCLG guidance, and should include reference to the application being for appraisal.
- Section 3.3: please check that the HGV movements are 'movements' (i.e. a vehicle coming to site is 1 movement, leaving is another) not HGVs. These should generally be even numbers to allow HGVs off site – particularly as some of the numbers given are not daily, but for the overall operation. Please confirm whether these are maximum or average movements as they may be subject to conditions restricting them.
- Section 3.5: please confirm details regarding the generator – what type would be used, how long it would be on site, what hours it would be used (i.e. would it operate overnight?), and what measures would be in place to mitigate the noise impact. Please confirm how much water would be used and how it would come to the site (tankers or borehole); and how much hydrochloric acid would be used and what impact this is likely to have. It is not possible to detail the exact specification, however the requirements are far less than those of the drilling operations. The applicant would be happy to work within the confines of condition 7 of the 2010 permission and/or require details of this equipment to be agreed prior to commencement. The water would be bought onto site by tankers. I confirm that the vehicle movements associated with this have been included in the overall vehicle numbers. Whilst the stored water will be stationed on site this does not mean that it will all be used and as such it is impossible to say exactly how much will be used. The operation of the proposal and control of pollutants will be monitored by the EA as will the make-up of 'acid flush'.
- Section 4.2 (landscape/visual): please add reference to lighting.
- Section 4.4 (noise): as above, please include specific details regarding the use of the generator and its potential noise impacts. As above.
- Section 4.6 (lighting): please clarify how long the site lighting would be in place, and refer to the plan requested above. Although not required for the full period, there are elements of all the stages that may require lighting, therefore the lighting is required for the 6 month period.
- Section 4.14 and 4.15 (air quality/flaring): section 4.14 simply notes that testing will be carried out. Please identify the main risks to air quality and how these will be mitigated, presumably with reference to (or inclusion of) section 4.15 which relates to flaring emissions.

Finally, a recording of the meeting held in Balcombe on 5 December can be seen here:

[http://www.westsussex.public-i.tv/core/portal/webcast\\_interactive/121359](http://www.westsussex.public-i.tv/core/portal/webcast_interactive/121359)

Regards  
Jane.

[Jane Moseley](#) | Principal Planner, Communities & Infrastructure, [West Sussex County Council](#) | Location: Strategic Planning Business Unit, 2nd Floor Northleigh, County Hall, Chichester, PO19 1RH