

Chris Bartlett
West Sussex County Council
Development Control
County Hall Tower Street
Chichester
West Sussex
PO19 1RH

Our ref: HA/2012/113291/01-L01
Your ref: WSCC/052/12/WC
Date: 27 September 2012

Dear Chris

**THE SITING AND DEVELOPMENT OF A TEMPORARY BOREHOLE, WELL SITE COMPOUND AND ACCESS ROAD INCLUDING ALL ANCILLARY INFRASTRUCTURE AND EQUIPMENT, ON LAND AT WOOD BARN FARM, BROADFORD BRIDGE, FOR THE EXPLORATION, TESTING AND EVALUATION OF HYDROCARBONS IN THE WILLOW PROSPECT.
WOOD BARN FARM, ADVERSANE LANE, BROADFORD BRIDGE, BILLINGSHURST, WEST SUSSEX**

Thank you for your consultation on this proposal.

Environment Agency position

We consider that planning permission should only be granted to the proposed development as submitted if the following planning conditions are imposed as set out below. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would wish to object to the application.

Condition 1 – Site Drainage

The development hereby permitted shall not be commenced until such time as a scheme to dispose of foul and surface water has been submitted to, and approved in writing by, the local planning authority. The scheme shall be implemented as approved.

Reason: To protect water quality and ensure compliance with the NPPF

Condition 2 – Construction Method Statement

No development shall take place until a Construction Method Statement has been submitted to and approved in writing by the local planning authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall

Environment Agency
Guildbourne House Chatsworth Road, Worthing, West Sussex, BN11 1LD.
Customer services line: 03708 506 506
www.environment-agency.gov.uk

Cont/d..

provide for:

- the storage of plant and materials used in constructing the development;
- the storage of fuels, oils and chemicals;
- a scheme for recycling/disposing of waste resulting from construction works, including storage;
- details of the construction of the engineered site to prevent pollution;
- details of the drilling fluids, how they are used and stored on site.

All of the above must include detailed pollution prevention assessments and mitigation methods to prevent pollution of the water environment.

Any changes to these components require the express written consent of the local planning authority. The scheme shall be implemented as approved.

Reasons: To protect water quality and ensure compliance with the NPPF

National Planning Policy Framework (NPPF) paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution. Government policy also states that planning policies and decisions should also ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121).

Supporting Notes

We have reviewed Chapter 11 - Ground and Groundwater Protection and the Groundwater Risk Assessment report which have been submitted for the above proposed development. The content of the reports are satisfactory and we agree with the conclusions and recommendations. As stated in the reports, the site lies on a non-productive aquifer and the risk to water resources is low. However due to the nature of the proposal, pollution prevention mitigation measures are required to protect groundwater and surface water receptors during this exploratory phase. We have therefore recommended the planning conditions above.

If the applicant intends to extract hydrocarbons after the exploration scheme, an Environmental Permit will be required. As part of the permit, it is likely that we would request as part of the site protection and monitoring plan a series of permanent groundwater monitoring boreholes along with other environmental monitoring requirements.

Please contact me if you have any questions.

Yours faithfully

Mr Mark Luker
Environment Agency
Planning Advisor

Direct dial 01903 703883

Direct e-mail mark.luker@environment-agency.gov.uk

End