



Celtique Energie Weald Limited
Exploring responsibly for oil and gas in Europe

Mr C. Bartlett Esq
County Development
West Sussex County Council
2nd Floor
County Hall
Chichester
PO19 1RQ

Our Ref: 20618/A3/JM
4 April 2013

Dear Mr Bartlett,

PROPOSED EXPLORATION WELL SITE (WISBOROUGH GREEN-1), NORTHUP FIELD, SOUTH OF BOXAL BRIDGE, KIRDFORD ROAD, WISBOROUGH GREEN, WEST SUSSEX - REQUEST FOR A SCOPING OPINION UNDER REGULATION 13 OF THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2011

This letter and the supporting plan represent a formal request on behalf of Celtique Energie Weald Ltd, for a Scoping Opinion, in accordance with Regulation 13 of the EIA Regulations 2011, from West Sussex County Council (WSSC).

In accordance with Regulation 13(2) of the EIA Regulations we have provided the following information:

- (a) a plan sufficient to identify the land; and
- (b) a brief description of the nature and purpose of the development and of its possible effects on the environment (provided below).

The Site and Proposed Development

The proposal seeks the temporary development of an exploration well site (Wisborough Green-1) on Northup Field, south of Boxal Bridge, Kirdford Road, Wisborough Green, West Sussex RH14 ODD to explore the potential for oil and gas reservoirs, within PEDL 234.

The Proposed Development will involve extending an existing agricultural access road and constructing a temporary well site within an enclosed compound to drill a vertical exploration well and establish if any oil or gas is present in the underground rock structures. Dependent upon the geological results of this well, a lateral would be drilled from the same borehole to explore and establish the presence of oil or gas in the horizontal rock structures. Should oil or gas be encountered in either of these wells, a short term period of testing would be undertaken to gather further information on the geology of the Weald Basin and the commercial viability of these new hydrocarbon discoveries including rock permeability, reservoir pressure and flow rates. Should no

hydrocarbons be encountered or if upon completion of testing the oil or gas is shown to be commercially unviable, the well would be plugged and abandoned in accordance with standard industry procedures and the site restored to its former use. If suitable quantities of oil or gas are encountered, the well would be suspended with a series of valves (often referred to as a “Christmas Tree”) and the access and hardstanding would be retained on site whilst an application is prepared and submitted to WSCC for further appraisal or production.

The planning application would seek permission for the construction, drilling and operation of the well site, the short term testing of any hydrocarbon discoveries and either restoration or retention of the well site. The Proposed Development can be separated into four separate Phases which are detailed in **Table 1.1** below, and **Figure 1** (enclosed). These Phases might not be carried out consecutively depending on for example, the availability of a rig, equipment or staff, the need for site and well maintenance or off site laboratory testing. The applicability of the Phases is also dependent upon whether oil or gas, or neither is encountered. It is also relevant to note that adverse weather can have an impact on the undertaking of the Proposed Development, for example, heavy rain can delay site construction and freezing temperatures can delay restoration. Moreover, the technical constraints associated with the drilling and maintenance of exploration wells means that until operations begin on site, it is difficult to anticipate how long it will take to complete the Proposed Development. Therefore both a best case and worst case scenario have been illustrated in **Table 1.1** with Celtique Energie using their best endeavours not to exceed the “worst” case scenario during the undertaking of any works. The best case scenario represents the most likely phasing of works but due to the changeable nature of exploration drilling, the Proposed Development will be assessed on the worst case scenario so that the environmental impacts will not be “worse” than those identified in the ES.

Table 1.1 Timescales and phasing of the Proposed Development

Vertical Exploration Well			
Phase of Activity		Best Case Scenario	Worst Case Scenario
Phase 1	Construction	6 weeks	10 weeks
Phase 2	Mobilisation and drilling	6 weeks	10 weeks
Phase 3a	Testing (gas)	1 week	2 weeks
Phase 3b	Testing (oil)	1 weeks	2 weeks
Contingent Lateral Exploration Well (see Phasing below)			
Phase 4a	Restoration	6 weeks	10 weeks

Lateral Exploration Well			
Phase of Activity		Best Case Scenario	Worst Case Scenario
Phase 2	Mobilisation and drilling	6 weeks	12 weeks
Phase 3a	Testing (gas)	1 weeks	2 weeks
Phase 3b	Testing (oil)	2 weeks	26 weeks
Phase 4a	Restoration	6 weeks	10 weeks
Phase 4b	Retention	Prior to Appraisal or Production (subject to planning)	

It is anticipated that the best case scenario will apply however, assessing the proposals on the worst case scenario allows for contingencies during the different Phases of the Proposed Development. A four week contingency has been included during construction to allow for poor weather, and during mobilisation and drilling in case problems are encountered. It is also worth noting that due to the limited availability of rigs, if the contingent lateral exploration well is not drilled immediately after the vertical exploration well, there may be a wait of up to 12 months before another drill rig can be acquired to drill the lateral well.

Based on the above, it is the worst case scenario which will be assessed for the EIA although it should be noted that the impacts are anticipated to be considerably less than those detailed in the Environmental Statement (ES) as the best case scenario is a likely to be a more accurate reflection of project timescales. It costs around £50,000 a day to mobilise and keep the rig on site, so Celtique Energie want to complete the works as quickly as possible but also need to make sure that operations are safe and the required information is obtained..

EIA Scoping

The Application Site comprises of 3.86 acres (1.56ha) and falls on arable land associated with Hookhurst Farm, Skiff Lane. The Proposed Development does not fall within Schedule 1 of the Town and Country Planning (Environment Impact Assessment) Regulations 2011. It may possibly be considered to constitute Schedule 2 development, if judged to qualify as a “deep drilling” or “surface industrial installation for the extraction of petroleum” in accordance with Sections 2(d) or 2(e) respectively of Schedule 2 of the Regulations. The threshold for “deep drilling” is an area exceeding 1ha whilst the threshold for a “surface industrial installation” is an area exceeding 0.5ha. If a development is considered to fall within Schedule 2, an EIA is only required if the site is located within a sensitive area or the proposal would be likely to generate significant environmental effects.

The Proposed Development is not considered likely to generate significant environmental effects due to its temporary nature and the Application Site is not designated as a “sensitive area” although environmental designations exist in the vicinity. The boundary to the South Downs National Park is located approximately 550m south of the proposed Application Site and with the exception of the field’s north western boundary, the Site is enclosed from the surrounding countryside by existing woodland blocks. The most significant areas of woodland consist of Dunhurst Copse and Northup Copse to the north and northwest, and Idehurst Copse approximately 750m to the east. Most of the surrounding woodland is designated as Ancient Woodland, and Idehurst Copse to the south forms part of The Mens which is a Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) within the South Downs National Park (SDNP). Celtique Energie chose early on in the process to design the proposals in accordance with EIA requirements on the basis that an EIA may be required. Celtique Energie is committed to being a good corporate neighbour and will continue to prepare this application as an EIA development, and is therefore seeking to confirm the scope of the ES with WSCC. A review of each of the topics identified with the EIA Regulations 2011 was undertaken as part of this scoping request.

Guidance regarding the content of the EIA is contained in Schedule 4 of the EIA Regulations. This, *inter alia*, requires the ES to include:

“A description of the aspects of the environment likely to be significantly affected by the proposed project, including, in particular, population, fauna, flora, soil, water, air, climate factors, material assets, including the architectural and archaeological heritage, landscape and inter-relationship between the above factors”.

Based on the Proposed Development, national planning policy, the relevant policies of the West Sussex Mineral Local Plan and the Chichester District Local Plan and the project team’s knowledge of the site and its environs, an assessment has been made regarding which of these topics or particular aspects of them can be ‘scoped in’ and ‘scoped out’ of the EIA. Issues that are scoped into the EIA are judged likely, without effective mitigation, to have the potential to cause significant effects. Issues that are scoped out of the EIA are those which are not anticipated to result in significant effects. The decision to scope out issues is based upon factors such as a high degree of development - receptor separation, the lack of effect pathways or the known low value or sensitivity of effected resources.

It should be noted that as the assessment precedes any omitted topics will be reviewed and their significance may be re-evaluated in response to additional information or changes to the Proposed Development.

Baseline

The purpose of baseline studies is to identify and describe the environmental conditions against which the Proposed Development can be measured or predicted. The baseline situation for this ES will assume that the environmental conditions at the site are as they exist at the present time in 2013. We are currently not aware of any consented developments that may be built out before the well site construction starts which will affect the baseline. We would be grateful if WSCC could advise us of any proposals you consider which may affect the baseline.

Assessment of Effects

The EIA Regulations stipulate that an ES should identify, describe and assess the likely significant effects of a development on the environment, including consideration of:

- Beneficial and adverse effects;
- Short, medium and long term effects;
- Direct and indirect effects;
- Permanent and temporary effects; and
- Cumulative effects and effect interactions.

The ES will identify and assess the likely significant effects of the Proposed Development in relation to both the construction and completed phases of the proposed development. Environmental effects will be evaluated with reference to best practice guidance, standards and legislation where available.

Temporal Scope

The EIA will address all the Phases identified in **Table 1.1**, with Phase 1 anticipated to take place in the second quarter of 2014.

Spatial Scope

The geographical coverage of the EIA will be determined by a number of factors including:

- the physical extent of work;
- the nature of the baseline environment, including the location of sensitive receptors;
- the distance over which effects will be significant; and
- the presence and type of “pathways” along which effects may be spread.

Scope of the ES

A. Ecology

Potential effects on ecology arising from the development described above include habitat loss and also degradation to adjacent habitats from damage or indirect effects such as noise and illumination. The site falls within intensively managed arable land of relatively low ecological value and makes use of an existing track for access. These factors, combined with the temporary nature of the proposals, followed by reinstatement, means that significant, long-term, adverse impacts on vegetation and habitats are unlikely to occur. Furthermore, any effects on vegetation are likely to be limited to the temporary loss of small areas of low quality habitats. Effects on fauna will be limited to the temporary loss of small areas of low quality habitat (arable land) and the disturbance of species using the edge of the adjacent woodland. Impacts on woodland species will affect a relatively small area of woodland edge and be temporary and reversible in nature.

A desk-based study has been undertaken to collate records of designated sites, ancient woodland (and other priority habitats), as well as protected and notable species of flora and fauna, including those listed on s41 of the NERC Act 2006. The desk-based study revealed that the The Mens SSSI/SAC, notified for its ancient woodland and bat populations, lies 0.6km to the south of the site. Furthermore, the Mens ancient woodland and Dunhurst & Northup Copses SNCI lie adjacent to northwest site boundary. Finally, seven species of bats have been recorded within 1km.

A Phase 1 habitat Survey (JNCC, 2011) was undertaken in March 2013. The survey revealed that the site is situated within an arable field, which is subject to waterlogging. Ancient woodland lies to the northwest of the site. A main badger sett was recorded on the western site boundary. The woodland adjacent to the site had potential to support roosting and foraging bats, hazel dormouse, nesting birds and badgers. The field margins may provide a green corridor for low numbers of common reptiles. Boxal Brook, which was flooded at the time of survey, may support water voles and otters.

Due to the proximity of the site to The Mens SAC, the proposed scheme will be screened for a Habitat Regulation Assessment. Further surveys for roosting and foraging bats will be undertaken in accordance with The Bat Conservation Trust (2012) guidance, this will involve bat roost surveys of any trees to be impacted by the scheme. Due to the proximity of the site to the SAC, bat activity surveys involving four visits will be conducted (including a dusk and predawn survey within one 24

hour period). Automated bat detectors will be placed in one location for three consecutive nights on four occasions between March and September to record bat passes over an entire season. Consultations will be undertaken with the Sussex Bat Group and The Mens SAC management to inform the assessment of bat activity and the Habitats Regulation Assessment screening.

A full dormouse survey is not considered necessary, as there will be no loss of dormouse habitat; however, as some indirect impacts from noise and lighting may occur a nut search will be undertaken to provide an indication on the presence or otherwise of this species.

The badger sett, recorded during the Phase 1 survey, will be monitored and a full survey will be undertaken to locate any other setts that may be constructed within 30m of the site.

A survey for water voles and otters will be undertaken at Boxal Brook. Further consultations will be undertaken with Sussex Wildlife Trust to inform the assessment of water vole and otter activity in the area.

Due to the very small areas of suitable habitat available to reptiles, a reptile survey will not be undertaken. However, it is assumed that low numbers of reptiles occur on the site and will need to be protected during operations on the site.

The impact assessment will consider direct and indirect effects arising from all the development phases and will be based on the 'Guidelines for Ecological Impact Assessment in the UK' (IEEM, 2006). The assessment will: identify significant effects on ecological receptors that are valued on a geographic scale of importance; describe avoidance, reduction compensation and enhancement measures; and assess the significance of residual effects on flora and fauna.

B. Landscape and Visual Impact Assessment

Land use and character: The site is within a previously undeveloped location and is currently in agricultural use with an existing access track off Kirdford Road. The site is representative of the landscape character area it lies within. The historic landscape character of the site is of a modern time depth and is not of a great significance; the site is set within a wider area of mixed time depths. There is potential for the proposal to have significant landscape impacts.

Tree Stock: The site does not contain any trees, although there are a number of tree lines and wooded boundaries adjacent to the site. No tree losses are required as a direct result of the proposals, although the proposals do have the potential to adversely impact a small number of trees.

Statutory Designations: The site does not lie in a designated landscape, but the 3km study zone lies partly within the South Downs National Park to the south. There are two Scheduled Ancient Monuments within the study zone. None of the trees adjacent to the site are subject to a tree preservation order. The site does not lie within a conservation area.

Other Designations: The site lies within 500m of a number of ancient woodland sites including Dunhurst Copse, Northup Copse, Kiln Copse, Jacksland Copse. Due to the proximity of ancient woodland the Forestry Commission should be consulted on the proposals.

Access: There is a well used local public rights of way network within the study zone but to the south there are no public rights of way within the 1km radius of the site. There are residences within 1km of the site but none are visible from the site itself.

Study zone: The 3km study zone has been approved by the case officer at West Sussex County Council as being appropriate to the LVIA study.

Methodology:

A Landscape and Visual Impact Assessment (LVIA) should be carried out taking into account, in particular:

- The WSCC Land Management Guidance Sheet LW2 – Low Weald;
- The WSCC Landscape Strategy (in particular guidelines for conserving historic landscapes and features; guidelines for commercial and industrial development including rural diversification; and guidelines for protecting the character of rural roads and lanes);
(It should be noted that there is no Landscape Character Assessment at District Level)
- The WSCC Historic Landscape Character Analysis.
- The visibility of the rig in views.
- Impact on SAMs.
- Impact on the setting of the SDNP.
- A Tree Survey, Arboricultural Impact Assessment and outline Arboricultural Method Statement should be prepared in accordance with BS5837:2012 (Trees in relation to design, demolition and construction – Recommendations) to accompany the application, taking into account, in particular, the potential impact on existing tree lines and wooded boundaries.

The LVIA should take into account the interaction with other topics/impacts such as road safety (e.g. the impact of any visibility splays, highway improvements, signage and road markings), ecological surveys, security requirements and the outcome of the tree survey/arboricultural impact assessment. The findings of the LVIA will be presented in the ES chapter: Landscape and Visual Impact.

C. Air Quality

Air quality effects from traffic will be limited through the temporary nature of the Proposed Development. Diesel exhausts from the generators powering the rig, vehicle exhausts and venting from any possible extended well testing is likely to have a negligible impact upon air quality. No hazardous, toxic or noxious substances will be emitted and therefore air quality has been scoped out of the ES. The site is not within an Air Quality Management Area and due to the temporary nature of the Proposed Development combined with the use of non-hazardous, toxic or noxious substances, Air Quality has been scoped out of the ES.

D. Noise

The construction works on the Application Site are expected to have some effects in terms of noise but these are not considered likely to be significant, unusual or different from those from a typical construction site and can be managed effectively through the usual measures to control noise from construction sites. The planning application will be accompanied by a separate noise assessment.

Noise effects may potentially arise from the operational phase of the Application Site. These effects will be assessed in the separate noise assessment accompanying the planning application. However, they are not expected to be significant for the following reasons:

- Traffic noise – the Proposed Development provides limited car parking and is at a small overall scale: traffic noise effects are not considered to be significant.
- Site noise – no significant operational noise impact from plant is anticipated from the Proposed Development. Noise from drilling operations is unlikely to be a source of noise nuisance for local residents in view of the intermittent and short-term nature of operations.

Noise levels from typical drilling operations using as input noise survey data from a rig of a specification suitable for the Development will be calculated according to the methodology of ISO9613-2. This makes due allowance for the effects of separation distance, ground absorption, atmospheric attenuation and screening by landform and barriers to sound propagation. The results of these computations at neighbouring noise-sensitive locations (typically, residential properties) will be compared with the pre-existing background noise levels at night, and assessed in the light of the NPPF and other relevant guidance. Noise mitigation measures, as necessary, will be discussed and recommended.

E. Transport and Access

Traffic survey data will be obtained from West Sussex County Council (WSSCC) for Kirdford Road and the A272. The data will comprise speed, volume and classification of traffic. Personal Injury Accident (PIA) data will be obtained from WSSCC for the adjoining highway network for the most recent five year period available.

A review of existing facilities for walking, cycling and public transport usage will be made although it is noted that due to the nature of the Proposed Development which will require specialist engineering equipment, these modes of travel may not be practical.

Details of expected operations and traffic volumes estimated will be based on operational requirements and expected traffic movements.

The environmental assessment of generated traffic will be undertaken in accordance with Guidelines for the Environmental Assessment of Road Traffic (Guidance Note No. 1), published by the Institute of Environmental Assessment (IEA) (now the Institute of Environmental Management and Assessment) with reference to Volume 11 of the Design Manual for Roads and Bridges (DMRB), published by the former DETR, now Department for Transport (DfT). These are recommended tools for the appraisal of environmental effects of transport and they identify appropriate standards for assessment. Reference will also be made to the "Guidance on Transport Assessment" March 2007 published by the Department for Transport.

The IEA Guidelines recommend two rules to be considered when assessing the effect of development on a highway link:

- Rule 1: Include highway links where traffic flows will increase more than 30% (or the number of HGV's will increase by more than 30%); and
- Rule 2: Include any other specifically sensitive areas where traffic flows have increased by 10% or more.

Subject to the outcome of the screening test set out above, the IEA Guidelines sets out a list of environmental effects which should be assessed for their significance and these are set out below:

- Noise;
- Visual Effects;
- Severance;
- Driver Delay;
- Pedestrian Delay;
- Pedestrian Amenity;
- Accidents and Safety;
- Hazardous Loads;
- Air Pollution; and
- Dust and Dirt.

Vibration and Air Pollution have been scoped out of the ES and Noise and Visual Effect will be assessed elsewhere in the ES. The Transport and Access section will assess the remaining traffic related environmental effects.

F. Flood Risk, Hydrology and Drainage

Based on correspondence with the Environment Agency and a review of the proposed development, it is considered that due to the temporary nature of the development and its location within Flood Zone 1 it is appropriate in terms of flood risk. Additionally, measures will be implemented to ensure that there is no impact on or from the development as a result of increased surface water runoff. Flood Risk has therefore been scoped out of the ES.

G. Ground and Groundwater Protection

The geological conditions are such that the strata penetrated by the boreholes have very little ground water resources potential and, in principle, no locally or regionally important aquifers are at risk.

At Phase 2, the storage and use of chemical additives to form drilling fluids plus lubricants creates a potential risk of ground and groundwater contamination in the event of accidental spillages and leaks. At Phases 2 and 3, similar risks apply in respect of the temporary storage of recovered hydrocarbons. In all cases these risks are mitigated by the secure, banded storage of such materials. In addition, site preparation will involve the installation of an impermeable HDPE liner across the entire drill site, lain above a level, crushed and compacted layer of 6F2 aggregate.

The risk of such contaminants migrating off-site in run-off to the nearest water courses is mitigated by the installation of a ditch system which leads to an interceptor that traps any run off before it is released. Uncontrolled release of potentially contaminated surface run off is thereby prevented.

The drilling of the borehole at Phase 2 creates the potential risk of contaminants entering minor aquifers via drilling fluids. In this case, the ground to be penetrated by the borehole is practically devoid of usable groundwater but also, in practice, the use of non-toxic drilling fluids, the temporary nature of the exposure, and the mud-balance control, are all such that the risk of contaminating fresh groundwater is negligible. These comments apply both in the case of the vertical borehole and the contingent lateral borehole. No such risk exists during Phases 3 – 4 because the upper freshwater horizons will by that time have been cased-off.

In the event of borehole abandonment the restoration of the borehole will be completed to the most rigorous industry standards and no long-term adverse effects on ground or fresh groundwater are anticipated. Overall the proposed development is expected to have a negligible effect in terms of ground and groundwater contamination.

H. Archaeology

Pastscape (<http://www.pastscape.org.uk/>) which holds records on the archaeological and architectural heritage of Britain and is derived from the National Monuments Record database indicates that there are 13 monuments within 1km of the proposed well site. In addition, the National Heritage List for England (<http://list.english-heritage.org.uk/mapsearch.aspx>) has been assessed and it shows that there are no world heritage sites, protected wreck sites, scheduled ancient monuments, registered parks or gardens or battlefields near to the site. From the information gathered, it is clear that the proposed well site may be located in an area of Post Medieval iron and glass working. Consequently an Archaeological Desk Based Assessment Report, including details of the relevant Historic Environment Record, map regression, and summary of the impact of the development on any potential archaeology, will accompany the ES. There are a number of Listed Buildings located near the Application Site, and these will be assessed in the Landscape and Visual Impact Chapter of the ES. Archaeology has otherwise been scoped out of the ES.

I. Lighting

The proposed development includes installing lighting on the drilling rig and at various low level locations within the site compound. This lighting has the potential to affect receptors in the area and it is proposed to assess these effects within the ES. A number of representative viewpoints will be selected from potentially sensitive receptors and these will align broadly with the Landscape and Visual Impact Assessment. The assessment will include a site visit in order to describe the existing sources of illumination and to establish relative heights between the site and the selected viewpoints.

The significance level attributed to each effect will be assessed based on the magnitude of change due to the proposed development, and the sensitivity of the affected receptor/receiving environment to change. The criteria used to determine the "significance" of any change in baseline lighting levels will be defined qualitatively using professional judgement and best practice guidance. The lighting assessment will be based on "Lighting in the Countryside: Towards Good Practice" (DEFRA, 2001).

J. Agricultural Land and Soils

Although the site is greenfield land, the proposal is for a temporary period only, and following the cessation of works and site remediation, it will return to greenfield status. It is anticipated that there will be no damage to soils which will be handled and stored in accordance with best practice guidance including the storage of separate top and sub soil bunds on site so that when restored, no alien soils will be brought onto site. The technical assessment on agricultural land and soils will therefore be scoped out of the ES.

K. Waste

The proposed volumes of waste material generated during construction and operation of the Proposed Development are considered negligible. Although the drilling phase produces significant

quantities of drilling mud and rock cuttings, this is for a limited period and they would be disposed of at a registered site, therefore Waste has been scoped out of the ES.

L. Socio Economics

Socio Economics have been scoped into the ES as the Proposed Development is likely to have an effect at both a local and national level through employment, employee spending, improving security of energy supply and supporting agricultural diversification. There is a recognised national 'need' to increase our domestic energy supplies, reduce our dependency on foreign energy imports and support the development of new infrastructure, and if approved this application would assist in meeting those national objectives.

The construction works for the well site are likely to generate some local employment where the relevant skills exist which may have a beneficial effect on the local economy. Drilling operations require a specialist team which are sourced with the rig which is likely to benefit the national economy. Employee spending would benefit the local economy as would the use of local materials such as aggregates, landscaping, security and accommodation facilities. Moreover, the temporary use of agricultural land for the Proposed Development would support agricultural diversification. Socio Economic data will be derived from the Office for National Statistics (ONS) including Census data and ancillary surveys.

Cumulative and Interactive Effects

In accordance with Schedule 4 of the EIA Regulations, the ES will include an assessment of the cumulative and interactive effects of the Proposed Development and any known developments in the surrounding area. Celtique Energie received planning permission for the development of the Broadford Bridge-1 well site in February 2013 but due to the limited availability of drilling rigs and suitably qualified staff, should the site at Wisborough Green be granted planning permission they would not be drilled at the same time. As a result this will not create cumulative or interactive effects. We would therefore be grateful if the Council could advise us of any known developments in the surrounding area which may be effected by our Proposed Development.

ES Structure

The ES will address the requirements of Parts 1 and 2 of Schedule 4 of the EIA Regulations. The anticipated structure and contents of the ES will be as follows:

Chapter	Title
1	Introduction – explanation of the background to the scheme and the ES
2	EIA Methodology – a definition of the EIA process and explanation of the assessment methodology undertaken
3	Site and Surroundings – a detailed description of the Application Site and the surrounding area
4	Project Description – a detailed description of the proposed development
5	Need and Alternative Sites – a review of all viable alternatives and the need for the proposed development
6	Construction Programme – a review of expected construction method and format

Each of the subsequent technical chapters will include a description of baseline conditions, identification of the potential significant effects, assessment of the significant effects, identification of mitigation measures and a review of the residual effects.

Chapter	Title
7	Ecology
8	Landscape and Visual Impact
9	Noise
10	Transport and Access
11	Flood Risk, Hydrology and Drainage
12	Ground and Groundwater Protection
13	Lighting
14	Socio Economics

The two end chapters will summarise findings of the technical assessments including a Summary of Mitigation Measures and Statement of Significance.

Chapter	Title
15	Summary of Mitigation Measures – a summary of all mitigation and monitoring measures proposed
16	Statement of Significance – a summary of the significance of the residual effects of the proposed development

A freestanding Archaeology Statement will be included with the application submission along with an Arboricultural Impact Assessment which will form part of the Landscape and Visual Impact Chapter, and a separate Planning Statement and Alternative Sites Assessment.

We trust the enclosed information is sufficient to enable you to consult the relevant consultees and for you to subsequently adopt a Scoping Opinion, but please do not hesitate to contact the writer if there are any matters arising in the interim. We would be grateful for an acknowledgement or formal receipt for this submission, together with notification of the expiry date of the statutory period.

Yours sincerely,



JENNY MASSINGHAM

Planning Advisor

Enc. Site Location Plan
Drilling Process Chart

APPENDIX 1

Proposed Traffic Movements Associated with Wisborough Green-1: Northup Field, South of Boxal Bridge, Kirdford Road, Wisborough Green, West Sussex

Phase 1: Construction

Initially there would be movement of site preparation plant comprising 3-4 low-load articulated trucks at the outset of construction activity. The access, car-park and site would require approximately 5,600 tonnes of stone (i.e. 280 lorry loads) delivered during a period of 5 weeks plus a small number of deliveries by HGV of ancillary construction materials/plant and 5-10 personnel movements per day by car or van. In total, the above movements equate to an average of 1 vehicle movement every 45 minutes during the normal working day of 8.00am-5.00pm, Monday to Friday, & 8.00am-1.00pm on Saturdays.

Phase 2: Mobilisation of the Drill Rig and Drilling of the Exploration Well/s

Mobilisation

The following deliveries are for a typical drilling rig of which 3 or 4 may be assisted by a police escort, and would arise at the time of drill rig mobilisation.

Delivery Items – Rig Mobilisation	Vehicles
Derrick Trailer with draw-works and rotary table sub-structure and ramp Mud pumps	Up to 50 tonne HGVs (wide loads) – likely to be assisted by police escort
Matting boards, blow out preventers and manifold mud Mud tanks Light plant, accumulator and change house Water tank and doghouse Toolhouse and fuel tank Catwalk, junk rack, V doors and stairs Toolpush cabin Forklift and washroom building Cranes (for assembly)	16 - 27 tonne HGVs
Total HGV movements (in only)	45 HGVs

A number of additional deliveries would be required during mobilisation for ancillary services, and would be delivered during the anticipated 3-4 day rig mobilisation period.

Delivery Items – Ancillary Services	Vehicles and Movements
Mud logging cabin and equipment Drilling mud solids control equipment Operational control cabin Materials and chemicals Accommodation modules	16 - 27 tonne HGVs
Total movements (in only)	10 HGVs

The total number of deliveries (55) equates to 110 HGV movements (in and out) and these would occur over an anticipated period of 3-4 days when the drill rig would be mobilised.

Personnel would work 12 hour shifts with two shift changes per day using cars or vans for transport with the number of personnel movements (15) equating to a total of 30 LGV movements (in and out) per day during mobilisation.

Drilling

During the drilling phase, deliveries of equipment and removal of drilling mud and cuttings would generate 2-3 vehicles (4-6 trips) per day over the remaining drilling period. Personnel would continue to work in 12 hours shifts using cars or vans for transport with the number of personnel movements (15) equating to a total of 30 LGV movements (in and out) per day generated at 8.00am and 8.00pm at personnel shift changes.

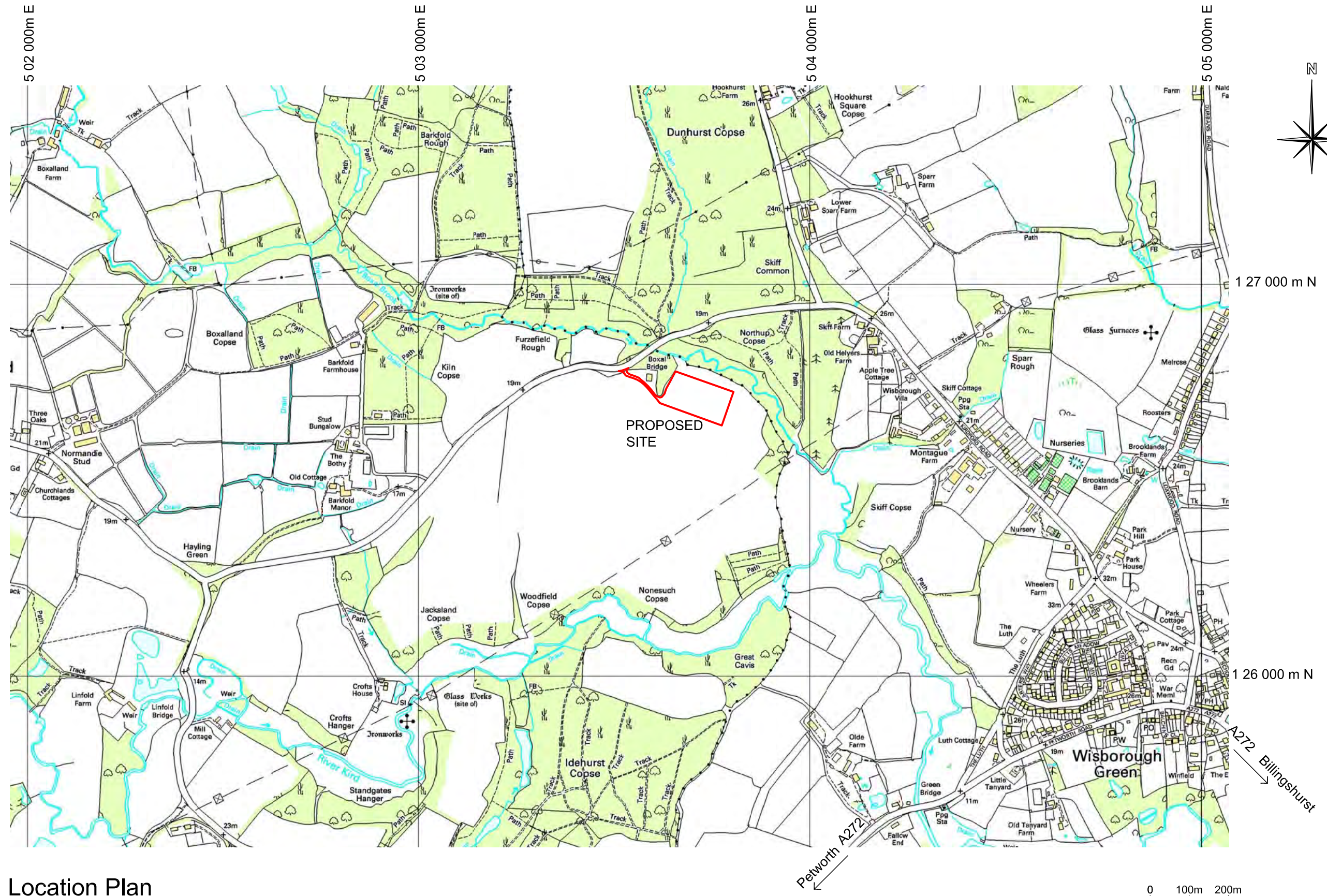
Following the completion of the drilling work, the rig would be demobilised and removed from the site over a period of 3-4 days. Traffic movements would be the same as those during the mobilisation phase - 110 HGV movements.

Phase 3: Carrying out of a short-term test and evaluation programme

It is anticipated that testing would be carried out over a period of up to 6 months. It is anticipated that vehicle movements would comprise no more than 6 movements by tanker per week. In addition, it is expected that there would two car movements per day for personnel to visit the site.

Phase 4: Restoration

The restoration of the site would take place over a period of 6-10 weeks. Traffic movements are anticipated to be broadly similar to the construction phase as materials are removed from site. Movements may take place over a slightly longer period if adverse weather conditions prevent restoration and earth movements taking place. It is also possible that traffic movements could be significantly reduced compared to the construction period should the landowner wish to retain the stone on an adjoining part of the farm which does not involve access onto the public highway.



Location Plan
Scale 1:10,000

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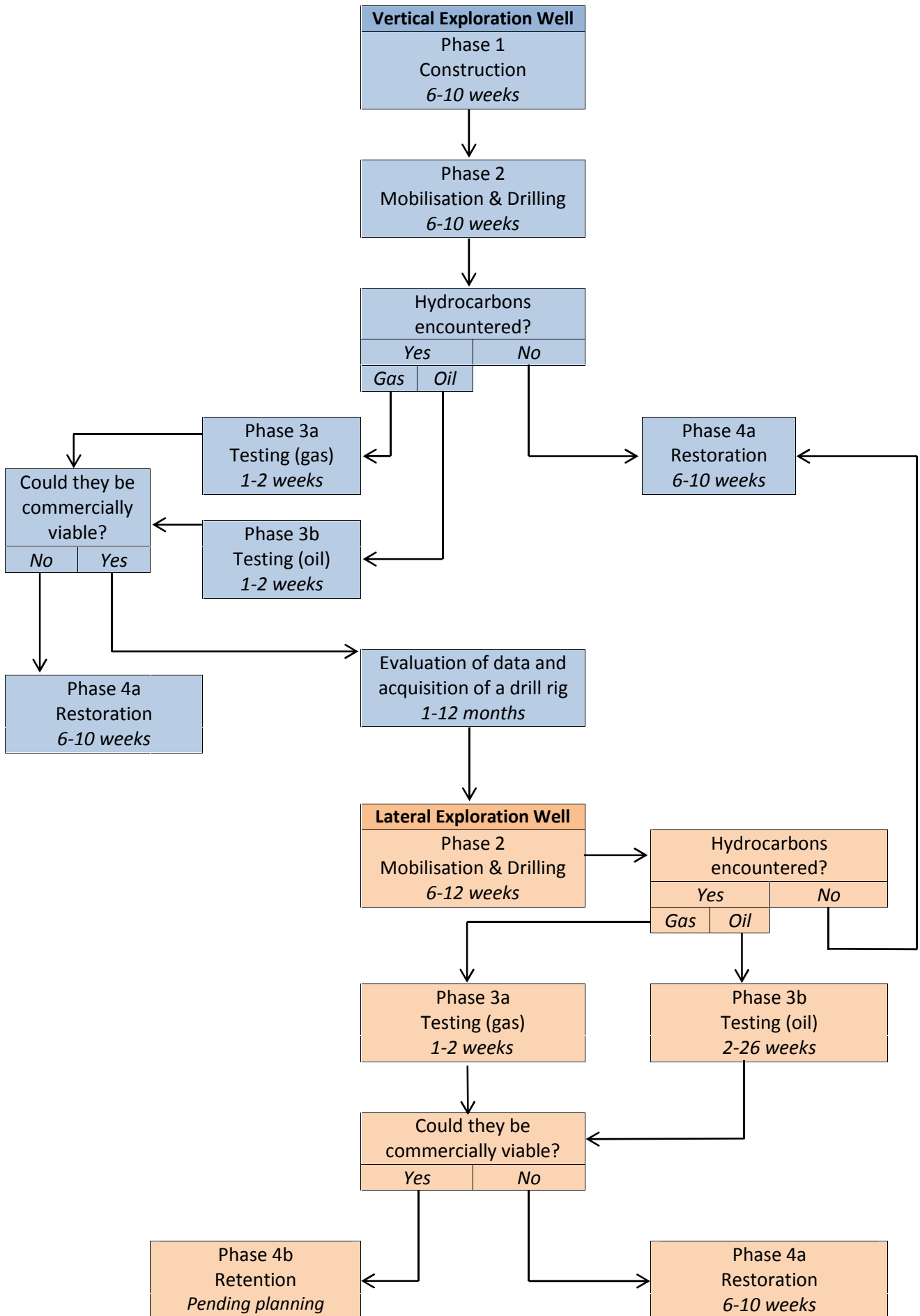


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Client	Celtique Energie Petroleum Boxal Bridge Wisborough Green West Sussex	
Job Title	Wisborough Green Site R	

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Drawing Number	3582 P 01				
Revision					

Figure 4.1: Timescales and Phasing of the Proposed Development



**THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL
IMPACT ASSESSMENT) REGULATIONS 2011:
REGULATION 13 – Request for a Scoping Opinion**

Proposal

**Proposed exploration well site (Wisborough Green 1) Northup Field, south of
Boxal Bridge, Kirdford Road, Wisborough Green, West Sussex**

Applicant

Celtique Energie Weald Limited

Agent

Jenny Massingham (Celtique Energie Weald Limited)

Date received

10 April 2013

**Classification of the Proposed Development and requirement for an
Environmental Impact Assessment**

Celtique Energie Weald Limited ('Celtique') has assumed that an Environmental Impact Assessment (EIA) will be required to accompany their proposed application for the creation of an exploration well site at Wisborough Green . On this basis they have submitted a request for a Scoping Opinion as allowed by the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 ('the EIA Regulations'). These allow a developer to ask the local planning authority for their formal opinion (a 'Scoping Opinion') regarding the information to be supplied in the Environmental Statement (ES). This provides clarity as to what the local planning authority considers the main effects of the development are likely to be, and accordingly, the topics on which the ES should focus.

West Sussex County Council (WSCC) has provided this Scoping Opinion in response to the information provided by Celtique on 10 April 2013. In providing this response, consultation has been undertaken with the relevant statutory authorities, along with the relevant Parish Councils.

WSCC can confirm that it considers the development to fall within Part 2 (d) and (e) of Schedule 2 to the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (the 'EIA Regulations') because it exceeds the 'deep drilling' and the 'surface industrial installation' thresholds.

SCOPING OPINION

1. Location

- 1.1 The proposed development site comprises some 1.56 hectares of arable farmland in Hookhurst Farm , located some 360 metres north-west of the village of Wisborough Green. The proposed site is flat (although the surrounding area to the north banks away quite steeply) and undeveloped, with farmland extending beyond the site to the south. The site's access would make use of an existing farm access off Kirdford Road, a minor road to the north of the site.
- 1.2 The nearest dwelling to the site is some 360 metres to the east.
- 1.3 The site is within the countryside, outside the built up area identified in the Chichester District Local Plan (1999). The South Downs National Park lies some 550 metres to the south. The Dunhurst and Northup Site of Nature Conservation Importance (SNCI) is adjacent to the site the north, whilst Ancient Woodland is adjacent to the west.
- 1.4 Boxal Bridge, approximately 85 metres to the north of the site, is as a Scheduled Ancient Monument. A large proportion of the village of Wisborough Green is designated as Conservation Area and there are a large number of Listed Buildings within the village.

2. Proposal

- 2.1 The development to which this Scoping Onion relates is the proposed exploration of hydrocarbons at Northup Field, south of Boxal Bridge, Kirdford Road, Wisborough Green.
- 2.2 The proposed development would comprise four separate phases: construction; mobilisation and drilling; testing; and retention/restoration. Depending on the geology found and results, a lateral borehole may also be drilled to explore and appraise the horizontal rock structures. The results from the testing phase would determine whether the site is retained (and subject to a new application for production), or restored.
- 2.3 As already noted, it is proposed that the site would use an existing farm access from Kirdford Road. It is then assumed that development traffic would exit right onto Kirdford Road, necessitating travelling through the village of Wisborough Green before continuing onto the A272 to the south.
- 2.4 The site's operational hours would be 08:00 – 17:00 between Monday and Friday, 08:00 – 13:00 on Saturdays, with no working on Sundays, Public or Bank Holidays.

3. Scope of the Environmental Statement

- 3.1 Every ES must provide a full factual description of the development, and consideration of the 'main' or 'significant' environmental effects to which the development is likely to give rise. The ES should, wherever possible avoid the use of jargon and be written in easily-understood language.

- 3.2 Every ES must also contain all of the information set out in Part 2 of Schedule 4 to the EIA Regulations, along with such information from Part 1 as is reasonably required to assess the effects of the project. The ES should therefore contain, as a minimum:
- a full description of the development;
 - measures to avoid/reduce/remedy significant adverse effects;
 - data to identify and assess the main environmental effects;
 - an outline of the main alternatives and reasons for the choice made; and
 - a non-technical summary.
- 3.3 The following sets out the County Council's views as to what main/significant areas will need to be considered within any forthcoming ES. It does not prevent the County Council from further requests for information at a later stage under Regulation 22 of the EIA Regulations, if deemed necessary.
- 3.4 The following matters should be considered
- 3.6 **Ecology:** In close proximity to the site is the Dunhurst and Northup SNCI and Ancient Woodland. The MENS Special Area of Conservation is also 0.6 km to the south. Celtique's Scoping Request states that a Phase 1 Habitat Survey undertaken in March 2013 recorded a main badger sett on the western boundary and the adjacent woodland had the potential to support roosting and foraging bats, hazel dormouse and nesting birds.
- 3.7 An extended Phase One survey should be undertaken in the first instance with follow up surveys to be completed as required. Potential ecological impacts arise from the proximity of the site to the SNCI and the Ancient Woodland.
- 3.8 The ES should consider the potential impact of lighting proposed as part of the development on protected bats. A bat-sensitive lighting scheme should be prepared by ecologists and submitted as part of the mitigation schemes.
- 3.9 The ES should specifically identify the potential impact of the development on trees on the highway, particularly as the site access would be adjacent to ancient woodland and mature trees. The highway improvements should be identified at an early stage so potential impacts on adjacent sensitive receptors can be identified.
- 3.10 A Tree Constraints Plan/Arboricultural Implications Assessment should be submitted to identify Root Protection Areas and ensure development avoids them.
- 3.11 Consideration should be given to the potential impact noise, air quality, vibration and traffic may have on the ecological features within the site and affected by its operation.
- 3.12 A mitigation plan should be submitted addressing the identified impacts setting out the timing, methodologies and translocations of the measures as required. It is reasonable to expect a suitable ecological element to the final restoration to support the application.

- 3.13 Further, in accordance with the National Planning Policy Framework, in addition to mitigation measures it is expected that some form of enhancement should be forthcoming.
- 3.14 Please note, that if European protected species are materially affected a derogation licence may be required and the Mineral Planning Authority must be satisfied that the three derogation tests (The Conservation of Habitats and Species Regulations 2010) have been met. This should inform the mitigation plan accordingly.
- 3.15 **Landscape and Visual Impact:** Given the site's location in a rural area, with the South Downs National Park some 550m to the south, the potential for landscape and visual impacts should be considered, taking into account all stages of the development.
- 3.16 A Landscape and Visual Impact Assessment (LVIA) should be undertaken in accordance with the Guidelines for Landscape and Visual Impact Assessment (LI and IEMA): Second Edition 2002¹, with the conclusions feeding into the Landscape and Visual Impact chapter of the ES.
- 3.17 This LVIA should take into account:
- the WSCC Land Management Guidance Sheet LW2 – North Western Low Weald;
 - the WSCC Landscape Strategy (2005) (in particular, guidelines for conserving historic landscapes, guidelines for commercial and industrial development including rural diversification; and guidelines for protecting the character of rural roads and lanes)
 - The WSCC Historic Landscape Character Analysis
- 3.18 The sensitive viewpoints to be considered in the LVIA should be agreed with the county planning authority before the assessment is undertaken.
- 3.19 The LVIA should include a photographic assessment of impacts from the agreed viewpoints. The site and height of the proposed drilling rig should be identified. When assessing the setting of the South Downs National Park, this should include views towards and from within the National Park.
- 3.20 The LVIA should appraise the potential impact of the following:
- Heights and location of the rig;
 - The access road;
 - Fencing requirements;
 - Location and design of offices, machinery and other fixed facilities;
 - Mitigation proposals; and
 - Site restoration proposals.

¹ Please note this may require revision in accordance with the third edition of the Guidelines if these are issued prior to the application being made.

- 3.21 The EIA /application documents should include a Tree Survey and Arboricultural Impact Assessment. Detailed information will be required if significant trees are likely to be affected.
- 3.22 The landscape/visual appraisal should consider the proposal during the different phases of development, as well as during restoration and retention.
- 3.23 The application should also consider the landscape and visual impact of any lighting which may be required.
- 3.24 **Noise and Vibration:** Noise impacts during the different phases of the development should be assessed, along with potential vibration impacts. This should take into account potential impacts on the nearest sensitive receptors including dwellings, Public Rights of Way, ecological features (habitats of the SNCI and Ancient Woodland) and publicly-accessible areas.
- 3.25 Sensitive receptors should be agreed with Chichester District Council's Environmental Health team before surveys are undertaken. A noise assessment should be undertaken in accordance with BS4142 and BS5228. The assessment should take into account the guidance set out in the National Planning Policy Framework and the World Health Organisation Community Noise Guidelines.
- 3.26 The methodology for quantifying noise and vibration emissions from road traffic should follow the methodology set out in the Department of Transport's Control of Road Traffic Noise, and Design Manual for Roads and Bridges. The outcome of this study should feed into the information set out in the ES.
- 3.27 **Transport:** A Transport Assessment will be required to accompany the application, the results of which should feed in to the Transport chapter of the ES. The particular issues which should be addressed in the Transport Assessment, and considered in the Transport chapter of the ES, relate to the additional number of HGV movements arising from the development and any resultant implications for highway safety and capacity, and the environment. It should also identify whether any improvement works (for example to Boxal Bridge) would be required along the roads leading to the site.
- 3.28 The impact of HGVs travelling along rural roads before reaching the A272 should be considered, and any mitigation/enhancement measures should be identified.
- 3.29 Given the site's rural location, and the potential impact of HGVs on Wisborough Green village, the selected route to the site should be justified clearly, and alternatives which were considered should be identified.
- 3.30 The environmental assessment of the transport section of the ES shall be informed by the following documents:
- The Environmental Assessment of Road Traffic: Guidance Note no.1
 - Design Manual for Roads and Bridges (DMRB)
 - Guidance on Transport Assessment (March 2007)

- 3.31 **Water Environment:** The EIA should include consideration of the implications of the development for the water environment in terms of Flood Risk, hydrology, drainage and groundwater protection.
- 3.32 This section should include a detailed assessment of potential impacts on both groundwater and surface water, but also details regarding surface water protection as the site lies within 50m of Boxal Brook and 450m northwest of the River Kird. The site lies also on the Weald Clay, a non-productive aquifer. In this regard, liaison with the Environment Agency is recommended.
- 3.33 It's recommend that a qualitative Environmental Risk Assessment (ERA) is produced that includes a detailed Conceptual Site Model.
- 3.34 The following items will also need to be covered in detail in any future planning application. The items should be covered as a suite of Method Statements and procedures for the protection of the Environment (pollution prevention) during any drilling work that may take place on site.
- Drilling operations including Well drilling, Well casing and testing;
 - Storage of substances including fuel and chemicals;
 - Drilling Mud Management Plan;
 - Pollution Prevention measure;
 - Pollution Incident Plan;
 - Environmental Monitoring and Management Plan including maintenance aspects;
 - Surface Water Drainage scheme
- 3.35 Drilling Methodology and consents: It is not clear at this stage whether the application involves the exploration of unconventional gas that will involve hydraulic fracturing. The following will potentially be required in conjunction with any planning application:
1. A notice to be served by the Environment Agency under Section 199 of the Water Resources Act to "construct a boring for the purposes of searching for or extracting minerals"
 2. Environment Permits for:
 - Groundwater Activity (if we consider that there might be a risk to groundwater)
 - Mining Waste Operations
 - Radioactive Substances Activity (if we consider that radioactive waste is likely to be produced)
 - Water Discharge Activity
 - A Groundwater Investigation Consent (to cover drilling and test pumping where there is the potential to abstract more than 20m³/day in the production process)

- A Water Abstraction Licence (if the operator plans to abstract more than 20m³/day for their own use)
 - A Flood Risk Consent if the proposed site is near a watercourse or main river.
 - For extraction, storage, transfer of product, discharges to the water environment and Directly Associated Activities (DAA) i.e. reinjection, flaring, storage or raw materials etc will require an Environmental Permit (2010).
- 3.36 A full Flood Risk Assessment will be required to accompany the application, and should help to inform the EIA. The site is adjacent to the Boxal Brook, so the potential impact on this, and the wider drainage of the area, must be considered, taking into account the topography of the area.
- 3.37 **Lighting:** Although it's understood that the development is temporary, the site is very rural and generally devoid of lighting. The lighting attributed to the site operations must be considered as part of the EIA. The lighting impacts shall include impacts upon the surrounding landscape/visual impact and ecology.
- 3.38 An assessment of the potential impact of the lighting elements of the development should be undertaken, in accordance with Defra's document 'Lighting in the Countryside: Towards Good Practice'.
- 3.39 **Socio-Economic Impacts:** An assessment of the potential impacts of the proposed development on the community living and working within the locality should be provided. Attention should be given to the potential to impact upon the countryside and the South Downs National Park and conserving and enhancing the natural beauty, opportunities for enjoyment by the public and wildlife of the National Park.
- 3.40 **Cumulative Impacts:** This should consider the potential cumulative impacts of the proposal alongside uses and developments within at least three kilometres of the site. These can be considered in each chapter on an issue-by-issue basis (e.g. cumulative noise impacts, cumulative air quality impacts etc.) or in a separate cumulative impacts section.
- 3.41 **In-Combination Impacts:** An appraisal of the potential interaction of impacts should be set out, acknowledging the potential for a combination of impacts to result in an impact of greater significance.
- 3.42 **Alternatives:** Alternatives to the proposed development should be set out, including a 'do nothing' option.

Topics to be Scoped Out:

- 3.43 We agree that the following topics are unlikely to result in significant impacts so can be excluded from detailed consideration in the Environmental Statement:
- Air Quality;
 - Archaeology: though a Heritage Statement should be submitted. This should include a desk-based archaeological risk assessment, along with measures for further, field-based assessment if necessary or desirable, and measures to mitigate the impact of groundworks on buried archaeological features, known or presently unknown;

- Agricultural Land and Soils: though the ES should detail how impacts on the land on which the site is located will be mitigated; and
- Waste.

3.44 Any considerations not included in the scope of the EIA should be adequately assessed as part of any planning submission.

3.45 The results of assessment and surveys which feed in to the Environmental Statement should accompany the application

3.46 Finally, for your consideration, the responses received as part of the Scoping Opinion exercise are supplied with this Scoping opinion.

Signed:

Chris Bartlett
for the Strategic Planning Manager
Date: 5 July 2013