Revised Planning Statement

Wisborough Green-1
Exploratory Well Site

~~July 2013~~
April 2014

The proposed development of an exploratory well site, Wisborough Green-1, for the exploration, appraisal and testing of the Central Weald Basin including the development of an access road, and the installation and operation of all ancillary equipment and infrastructure

Prepared for
Celtique Energie Weald Limited
4th Floor Newlands House
Berners Street
London
W1T 3NA

0207 255 6100

Ref: 20618.P1~~b~~**c**.PS.JM
Date: ~~July 2013~~ **April 2014**

CONTENTS

1.0A INTRODUCTION

A1. Section Alterations

A1.1 This Section of the Revised Planning Statement has been updated in respect of the following:

- **Clarification of document being revised in connection with an Addendum to the submitted Environmental Statement (ES)**
- **Alteration of Section numbers to clarify the location of changes**

Overview

1.1 This Revised Planning Statement has been prepared by Celtique Energie Weald Ltd ("the Applicant") to accompany a planning application for the development of an exploratory well site on land south of Boxal Bridge, Kirdford Road, Wisborough Green, West Sussex to explore for hydrocarbons in the Central Weald Basin **which was originally submitted in July 2013**. The application has been submitted to West Sussex County Council (WSCC) under the provisions of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004. The application seeks planning permission for the following elements;

- The construction of an access road and well site compound;
- The mobilisation of drilling equipment and the development of an exploratory borehole;
- The testing and appraisal of any hydrocarbons discovered; and either
- The restoration of the site should no hydrocarbons be found or if reserves are commercially unviable; or
- The retention of the well site for production, subject to further planning permission, should reserves be commercially viable.

1.2 **The planning application was supported by an ES and, following submission of the application in July 2013, WSCC requested further ES information under Regulation 22 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2011 in November 2013.** ~~This Planning Statement sets out the details of the Proposed Development and should be read in conjunction with the accompanying Environmental Statement and planning application drawings.~~

1.2a There are a series of detailed environmental assessments contained the ES and ES Addendum which have informed and accompany the planning application submission, and this Revised Statement should be read in conjunction with these documents.

1.3 The remainder of this Revised Statement provides background information on planning, sustainability and need, our conformity with planning policy frameworks, measures for environmental mitigation and the role of onshore oil and gas projects in ensuring security of supply in the UK. The Revised Statement comprises of the following Sections;

Section 2.0	Why Do We Need Oil and Gas?
Section 3.0	National Energy Strategy
Section 4.0**A**	The Proposed Development
Section 5.0	Site and Surroundings
Section 6.0**A**	National Planning Policy
Section 7.0	The Development Plan
Section 8.0**A**	Sustainability Appraisal
Section 9.0**A**	Accordance with National Planning Policy
Section 10.0**A**	Accordance with the Development Plan
Section 11.0**A**	Summary and Conclusions

1.4 **New text is indicated by bold underlined font. Deleted text is indicated by strikethrough font.**

2.0 WHY DO WE NEED OIL AND GAS?

How and where is oil and gas formed?

2.1 Oil and gas (hydrocarbons) are the product of the compression and heating of organic materials including the remains of plants and organisms mixed with clay, silt, sand and other sediments. Over a geological time period of millions of years, the sediment will be buried under many layers of further material. The organic-rich sediment which is referred to as a hydrocarbon "source rock" will be broken down, or "cooked" to oil and gas under the increased temperatures and pressures caused during burial in the Earth's subsurface. Hydrocarbons will form near to the where the initial sediments were laid in the Earth's past and providing suitable subsurface conditions are present.

2.2 This is a natural process which cannot be controlled and therefore hydrocarbons can only be mined from where they naturally occur. Mineral exploration involves drilling through these natural rock formations which may contain the oil and gas deposits, to understand the subsurface geology and assess any minerals discovered.

What do we use oil and gas for?

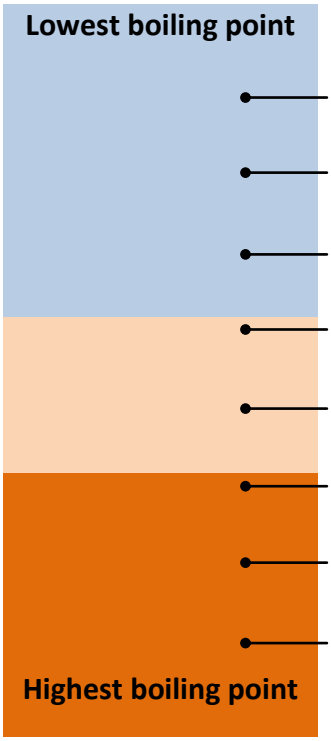
2.3 Oil and natural gas feature in our daily lives as a source of mobility, heat and electricity. Oil is an important feedstock for a number of critical industries including agriculture, transport services, manufacturing companies, and energy, petrochemical and medicinal suppliers. Gas is also an essential energy source which is used for electricity generation, heating and cooking, and is largely transported through pipelines although it can be liquefied for ease of storage and transportation.

2.4 Oil and gas are also used to create a number of other products. Oil is used in the agriculture sector to produce ammonia which is used in fertilizers, and oil is also used to create synthetic rubber for tyres. Oil is used to make plastics for components and appliances such as computers and TV's, as well as fabrics including nylon, styrofoam and

PVC. Some cosmetic and pharmaceutical products are also by-products of oil including dyes, synthetic detergents, lipstick, deodorants and aspirin.

2.5 A number of substances which are produced from oil and their subsequent uses are highlighted below in **Table 2.1**;

Table 2.1: Substances Produced from Oil and their Uses



Substance	Uses
gases	Propane and butane gas for lighter fuel
naptha	Chemicals for medicine, plastic & cosmetics
gasoline	Petrol for vehicles
kerosene	Jet fuel and paraffin
diesel oils	Diesel fuel
lubricating oils	Machine oil, waxes and polishes
fuel oil	Fuel for ships and central heating
residue	Bitumen for road surfaces and roofing materials

***Source**: Oil and Gas UK, January 2012*

2.6 Oil and gas are regular components of our modern daily lives, and as people and products seek greater local and global mobility the need for oil and gas will continue until there is a significant reduction in energy consumption or alternative sources become available.

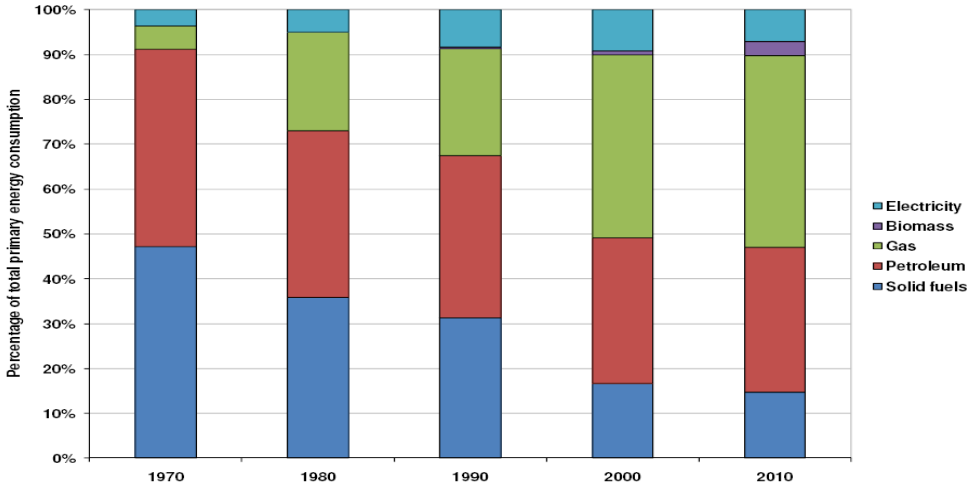
How much oil and gas do we use?

2.7 Natural gas is one of the UK's primary sources of energy and statistics derived from DECC's annual meter-point level data, estimates that in 2011 the number of gas-consuming households in Great Britain was almost 23million. According to Census data

on the number of households with at least one usual resident, there were 25.7million households in Great Britain in 2011, meaning that over 89% of households use gas. Gas is used directly for cooking, heating and the use of home appliances whilst a large number of consumer goods and products are also made from the chemical processing of gas. Natural gas is used to produce steel, glass, paper, clothing, brick and electricity, and is an essential raw material for many common products including paints, fertiliser, plastics, anti-freeze, dyes and medicines.

2.8 **Figure 2.1** illustrates the total primary energy consumption by fuel in the UK from 1970 to 2010 and illustrates the UK's high consumption and therefore need, of natural gas which accounts for the greatest percentage of primary energy consumption. Gas is used in its natural form as well as to generate electricity, and subsequently demand in the National Gas Transmission System is set to grow at a peak rate of around 2.1% per annum over the next decade from 2009 (National Grid, Gas Transportation Ten Year Statement 2009).

Figure 2.1: Total Primary Energy Consumption by Fuel (UK) 1970 - 2010



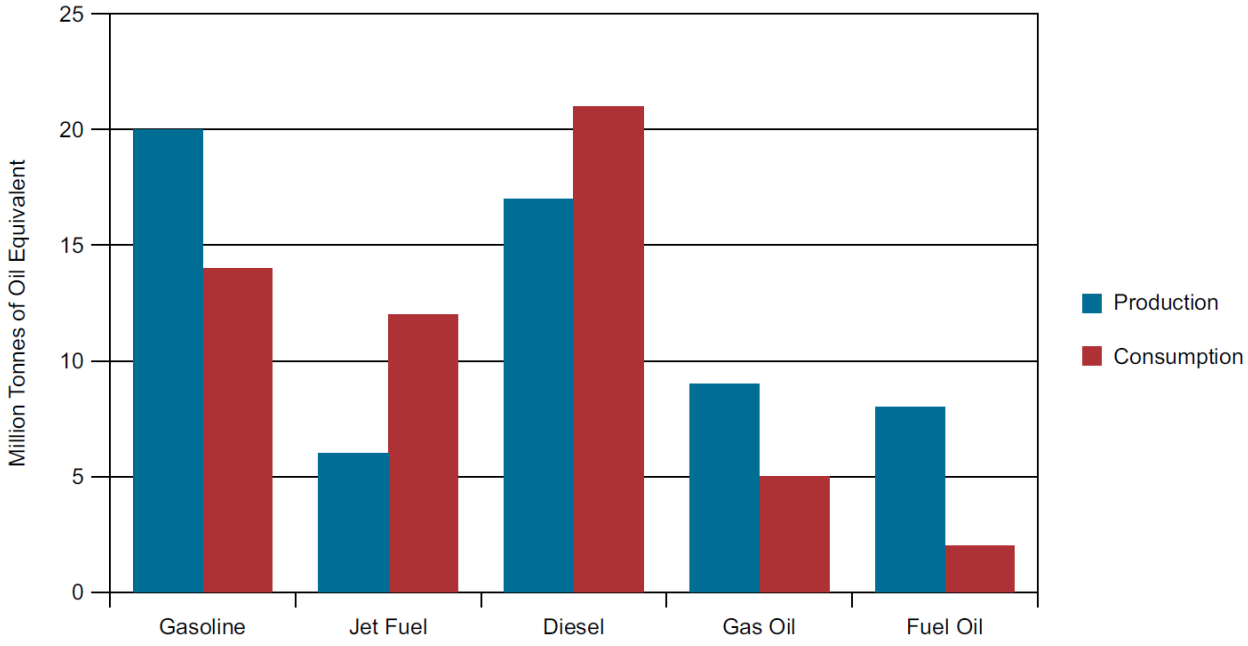
Source: *Digest of UK Energy Statistics, DECC, 2011*

2.9 **Figure 2.1** illustrates that since 1970, total primary energy consumption in the UK has changed from the predominant use of solid fuels to an increasing, and now dominant, use of natural gas as the primary source of energy consumption in 2010. In the 1970's solid fuel accounted for approximately 47% of the total primary energy consumption

compared to only 14% by 2010, equating to a reduction of around 33% over 40 years and illustrating the increasing need for natural gas. In comparison, over the same 40 year period, gas consumption rose approximately 40% from 5% in 1970 to around 45% by 2010 and has become the dominant source of primary energy consumed. Biomass energy consumption has risen from around 0.5% in 1990 to 3% in 2010 and electricity has also increased since 1970 although it is not clear if this is from renewable or non-renewable generation sources.

2.10 The "Statutory Security of Supply Report" (SSSR) published by DECC and Ofgem in November 2012, states that oil accounts for around a third of our primary energy used in 2011, with transport accounting for 75% of oil consumption at almost 49 million tonnes (page 36). In the last decade, demand for oil has increased as a result of the growth in the aviation sector and the use of diesel vehicles whilst its use in power generation has decreased, as illustrated by **Figure 2.4**.

Figure 2.4: Production and consumption of key petroleum products in 2011



Source: *SSSR, 2012, page 37*

2.11 Although the UK is a net exporter of petroleum products, the UK is increasingly reliant on importing other products to meet demand using significant quantities of diesel road fuel and aviation fuel (SSSR, page 36).

The Demand for Oil and Gas

2.12 The demand for oil and gas in the UK has exceeded our domestic supply since 2004 for gas and 2006 for oil. Recent figures from DECC on "Actual/Projected UK Oil and Gas Production" and "Actual/Projected UK Oil and Gas Demand" (2013) indicate that the demand for oil and gas will continue to exceed domestic supply over the next 15 years. By 2025 the UK is projected to be dependent on foreign imports for 57% of the oil and 68% of the gas needed to meet energy demands, rising to 68% and 77% respectively by 2030 (**Appendix 2.1**).

2.13 DECC concludes that these decreases stem from a number of unexpected slowdowns on the UK Continental Shelf (UKCS), as well as general decline in UK production from the UK's established fields. There are a number of crude oil fields in the UK and internationally which have passed their peak production and the increase in demand combined with the stagnation and even decline in supply, has seen oil prices increase significantly in the last decade.

2.14 The UK's onshore oil and gas industry fully supports the development of renewable energy resources but still has a responsibility to help meet the UK's demand for fossil fuels through the development of domestic reserves until such a time when renewable energy sources can meet a greater proportion of our energy needs. Notwithstanding this, renewable energy sources such as wind, can be intermittent and therefore gas is expected to be required in the long term to avoid interruptions to energy supplies when renewable energy may be variable. Notwithstanding the need to develop further renewable energy resources and more efficient technology, renewable energy infrastructure will also need to be incorporated into our daily lives and is likely to be a long term process. At present whilst renewable energy is starting to provide a greater

proportion of our energy mix, it still only currently meets a small percentage of our energy needs.

2.15 As **Figure 2.1** illustrated earlier in this Chapter, since the 1970's there has been a marked change in the UK's main source of energy, from coal to natural gas. Fuel mix disclosure data from the Electricity (Fuel Mix Disclosure) Regulations (2005) shows that as an energy source, coal produces the greatest carbon dioxide emissions at 910 g/kWh compared to natural gas at 390 g/kWh. Other sources produce 540 g/kWh whilst nuclear and renewable sources produce no carbon emissions, providing an average of 430 g/kWh. Carbon emissions for natural gas are therefore lower than the overall average.

2.16 Fuel mix disclosure data from DECC illustrated in **Table 2.2** below, shows the UK fuel mix during the period 1 April 2011 to 31 March 2012 with figures for the previous year provided as a comparison.

Table 2.2: UK Fuel Mix

Energy Source	**% in 2010/11**	**% in 2011/12** (% change)
Coal	28.9	29.2 (+0.3%)
Natural Gas	44.2	40.7 (-3.5%)
Nuclear	17.3	19.1 (+1.8%)
Renewables	7.9	9.2 (+1.3%)
Other	1.7	1.8 (+0.1%)

***Source**: Fuel Mix Disclosure Data, DECC, 2011 and 2012*

2.17 The data in **Table 2.2** clearly illustrates the UK's dependency on natural gas for fuel at 40.7% whilst in comparison, renewable energy sources only contributed to 9.2% of the UK's fuel mix in 2011/12. However it is worth noting that the mix is -3.5% for gas and +1.3% of renewables on the previous year. The use of coal has also increased by +0.3% which as previously discussed produces the greatest carbon dioxide emissions. Therefore whilst the Coalition Government continue to encourage the development of low carbon energy sources through national policy and initiatives, it is important to acknowledge

that fossil fuels will still form a part of our energy mix for the foreseeable future until cleaner energy sources can account for a greater proportion of the UK's energy mix.

2.18 Quarterly data from DECC on the supply and use of crude oil, natural gas liquids (NGL) and feedstock's published on 28 March 2013, shows that indigenous crude oil production in 2012 was significantly lower than 2011 with a 14.3% decrease – the equivalent of 7.4 million tonnes. NGL production also decreased during the same period by 26.7% with planned and unplanned maintenance at the Buzzard field and St Fergus gas terminal, and restrictions on production in the Elgin area being contributing factors, as well as a long term declining trend in indigenous production.

2.19 In the fourth quarter of 2012, crude oil production was significantly lower by 19.8% compared to the same quarter in 2011, and this is the second largest quarter on quarter fall on record. In overall terms there was an 11.1% increase in net imports of primary oils from 23.8 million tonnes in 2011, to 26.5 million tonnes in 2012. These figures illustrate the significance of decreasing indigenous supplies and our growing dependency on foreign imports which reduces our security of supply and can lead to shortages in supply and substantial price increases.

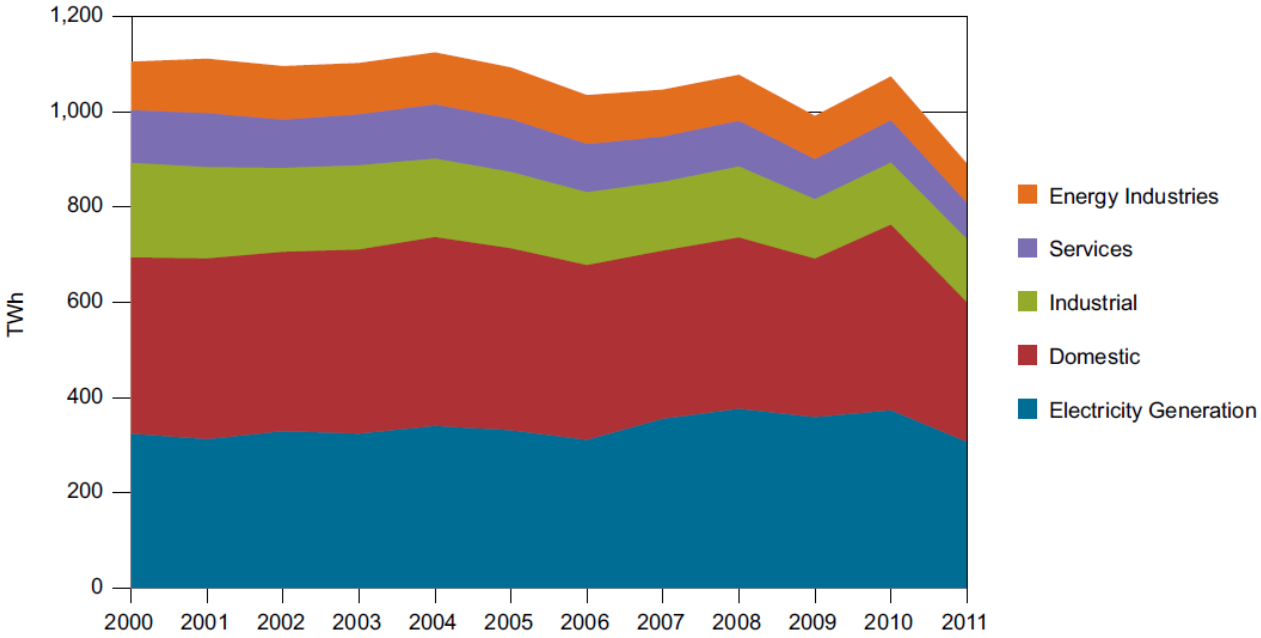
2.20 Information from the "Statutory Security of Supply Report" (SSSR) published by DECC and Ofgem in November 2012, indicates a sharp reduction in natural gas consumption in 2011 (**Figure 2.2**). This sharp decline in consumption can be attributed to a combination of factors including;

- The continuing slow recovery from the 2008 global financial crisis;
- A relatively mild winter; and
- Prices favouring coal-burn in the power sector (page 16).

2.21 The demand for gas varies on a daily basis although demand tends to be much lower in the summer compared to winter. In comparison, demand for industrial purposes and electricity generation tends to be less seasonal and driven by the price of gas relative to the prices of other fuels and the price of electricity (SSSR, page 17). However, the SSSR

notes that it is not only temperature and the costs of other fuels that will impact future gas demand, but also the role of gas in the UK energy mix.

Figure 2.2: Consumption of Natural Gas from 2000 to 2011

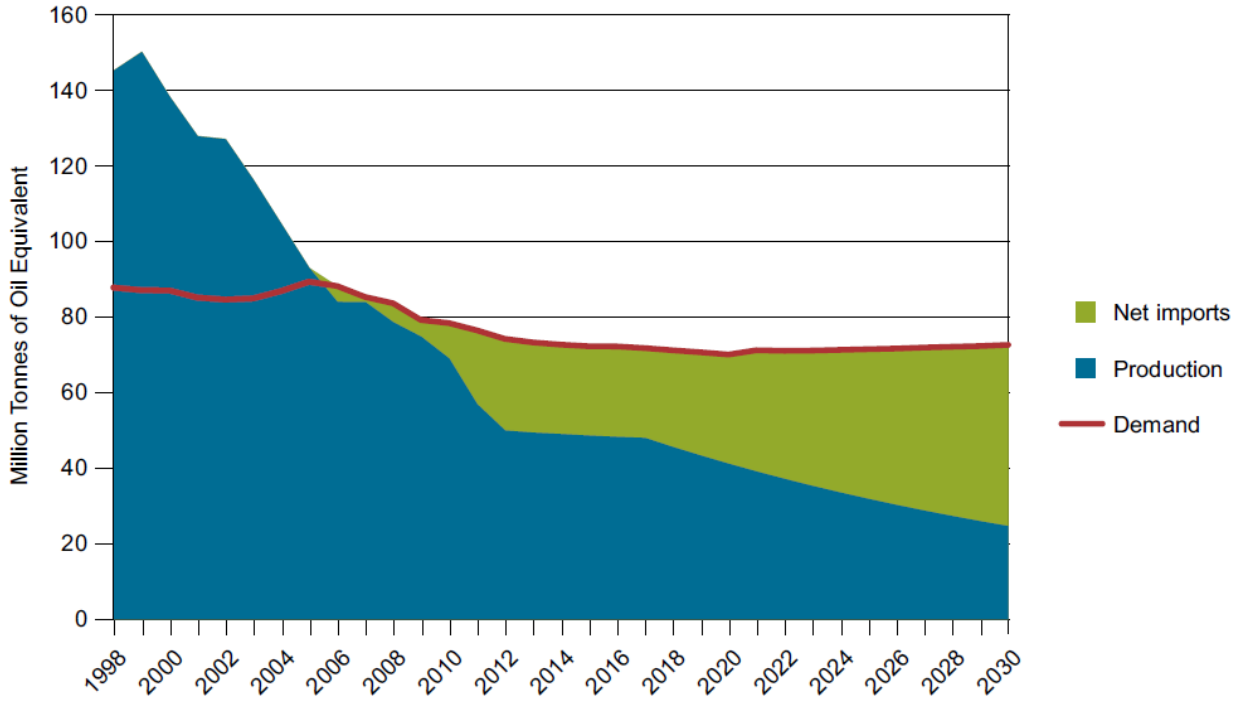


Source: *DECC, SSSR (2012), page 17*

2.22 The SSSR warns that in the coming years the gas market will need to become increasingly flexible as gas-fired power generators are used to balance periods of unpredictable wind generation or as a result of nuclear capacity. Resolutions include greater demand side response and increasing gas flow rates around the network and the SSSR notes that "the increased volatility in gas demand coincides with the closure of 12 GW of coal and oil generation capacity in the middle of the decade… increasing the reliance on gas for electricity generation" (page 20).

2.23 The latest predictions in the SSSR (2012) indicate that UK oil production is expected to continue falling from approximately 50 million tonnes of oil equivalent in 2013 to approximately 20 million by 2030 whilst demand is expected to remain at recent rates of 75-90 million tonnes of oil equivalent in the same period, leaving the UK increasingly dependent on net imports (**Figure 2.3**).

Figure 2.3: UK Oil Demand, Production and Imports



***Source**: DECC, SSSR (2012), page 36*

2.24 The demand for oil comes from its use in a number of critical industries including agriculture, transport services, manufacturing, and energy, petrochemical and medicinal suppliers, as well as being used to make aviation and vehicle fuel, lighter fuel, paraffin and Bitumen for road surfaces and roofing materials. The supply of oil and gas is therefore essential to meeting the needs of these industries and its users.

The Supply of Oil and Gas

2.25 The UK has been a net importer of gas since 2004 and is becoming increasingly dependent on foreign supplies to meet energy demands. The UK has seen net imports of gas increase from 323,740 GWh per year in 2007 to 577,960 GWh in 2011 with the UK growing increasingly dependent on gas imports from Norway (40%) and Qatar (39%) (**Table 2.5**).

Table 2.5: Natural Gas Imports and Exports

GWh

	2007	2008	2009	2010	2011
Imports					
by pipelines from:					
Belgium *(2)*	6,471	12,174	7,945	13,568	4,032
The Netherlands *(3)*	76,602	90,563	69,529	87,120	69,001
Norway *(4)*	225,764	283,722	260,438	276,807	234,194
Liquefied Natural Gas (5)	14,903	8,912	110,579	203,789	270,733
of which:					
Algeria	*6,605*	*3,113*	*19,392*	*11,524*	*2,647*
Australia	-	-	*812*	-	-
Egypt	*1,751*	-	*5,804*	*1,263*	*877*
Nigeria	-	-	-	*3,674*	*12,833*
Norway	-	-	*1,862*	*8,904*	*9,965*
Qatar	*2,693*	-	*61,159*	*159,984*	*230,618*
Trinidad & Tobago	*3,854*	*5,799*	*21,550*	*16,646*	*5,816*
USA	-	-	-	-	*1,552*
Yemen	-	-	-	*1,794*	*6,425*
Total Imports	**323,740**	**395,371**	**448,491**	**581,284**	**577,960**
Exports to:					
Belgium *(2)*	51,390	45,949	62,084	95,932	101,526
The Netherlands *(6)*	6,358	10,389	13,094	15,830	17,544
Norway *(7)*	153	389	266	158	125
Republic of Ireland *(8)*	50,972	54,260	54,357	56,266	58,041
Total Exports	**108,873**	**110,987**	**129,801**	**168,186**	**177,236**
Net Imports *(9)*	**214,867**	**284,384**	**318,690**	**413,098**	**400,724**

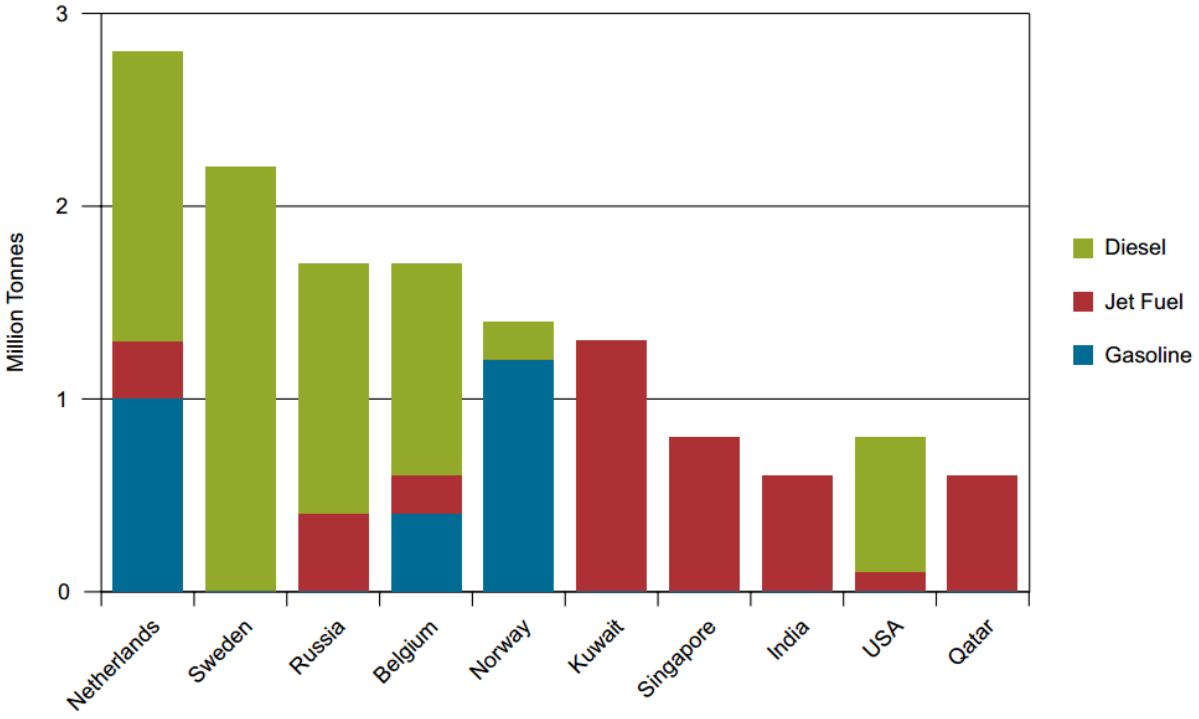
Source: *DECC, Digest of UK Energy Statistics, 2012 (Table 4.5)*

2.26 The UK's dependency on foreign imports for gas supply creates further risk to our domestic security of supply, although the UK does maintain some capacity for gas storage. The ability to meet demands for gas, whether on a particular day or over a more prolonged period such as a severe winter, is particularly important in a security of supply context. Rob Hastings, energy and infrastructure director at the Crown Estate, stated in the Financial Times on 23 March 2013 that in the preceding days, energy supplies had diminished with as little as 6 hours' worth of gas left in storage. Mr Hastings explained that if this had run any lower it would have meant interruptions to gas supplies, thus highlighting the implications of decreasing domestic production and limited storage capacity on supply shortages.

2.27 As the demand for oil is likely to continue due to its use in transport and aviation, foreign supplies will continue to be a growing form of supply as UK production continues to fall.

The UK is increasingly dependent on the Middle East and Norway for the supply of aviation and diesel fuel (**Chart 2.2**).

Chart 2.2: UK Oil Product Imports



***Source**: SSSR, page 38*

2.28 More energy efficient engines and alternative fuels are required to reduce our dependency and help to ensure the UK's security of supply. The demand for oil is set to grow globally by 14% up to 2035 and as a result of our dependency on imports, is likely to leave the UK exposed to the global oil market.

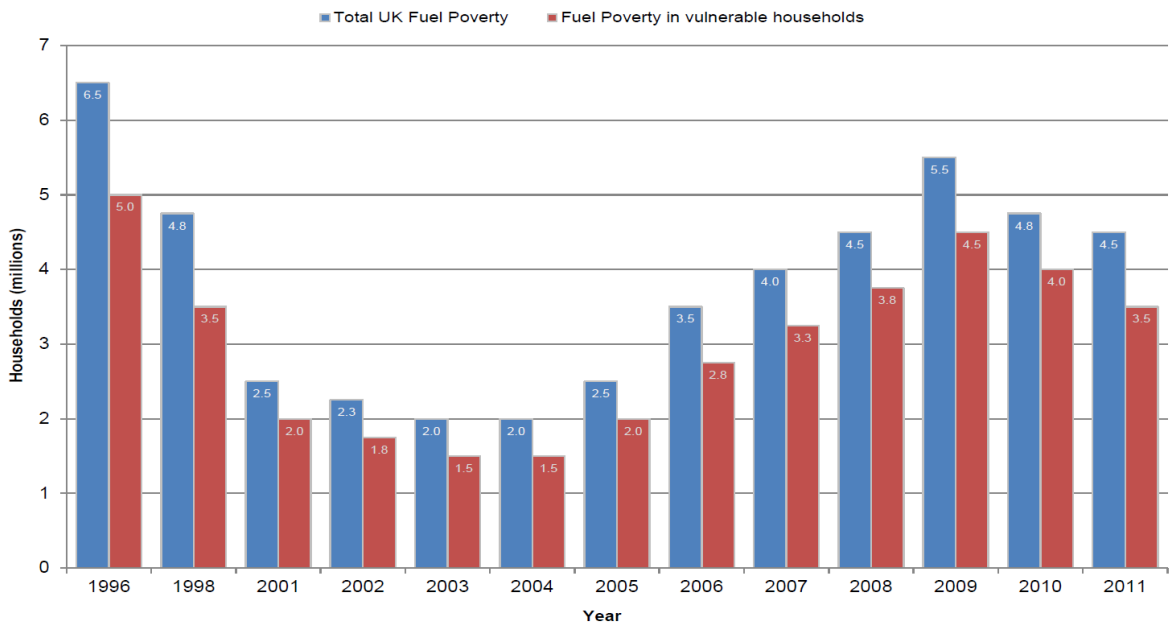
Ensuring Security of Supply

2.29 The development of renewable energy sources and their integration into our existing energy infrastructure will require significant investment and development before it will replace the demand for oil and natural gas. During this transition, it is important that our security of supply is increased to prevent the detrimental impact that a restricted fossil fuel supply would have on our economy and society, in particular vulnerable groups living in or on the edge of fuel poverty. Moreover, the variability and relatively

unpredictable nature of some renewable energy sources means that natural gas and oil are likely to continue to be required during periods of interruption to renewable energy supplies, and will need to become more flexible through greater demand side response and by increasing the rate at which gas can flow through the system (SSSR, 2012).

2.30 In January 2010, a Gas Balancing Alert (GBA) was issued by National Grid as the UK experienced one of the coldest winters since the mid 1980's, in which demand for gas was likely to outstrip supply, leaving households without power (BBC News, 2010; Met Office, 2011). **Chart 2.3** (below) illustrates the levels of fuel poverty in the UK (all households and vulnerable) from 1996 to 2011[1].

Chart 2.3: Fuel Poverty in the UK, 1996 to 2011



***Source**: Annual Report on Fuel Poverty Statistics, DECC, 2013*

2.31 DECC's Annual Report on Fuel Poverty Statistics (2013) states that between 2004 and 2009 energy prices have increased significantly for oil and gas at over 75% and 122% respectively (page 19). Whilst the North Sea provides the majority of our domestically produced natural gas, the onshore industry still plays a vital role in helping to deliver security of supply, as well as other important local economic and social benefits through

[1] Data unavailable for 1997, 1999 and 2000

the use of local services and materials, employment, employee spending and supporting agricultural diversification.

Supporting Economic Growth

2.32 Notwithstanding the contribution our indigenous supplies of oil and gas, make to ensuring the continued running of our homes, business and transport systems, it also makes a significant contribution to economic growth and employment. The Digest of UK Energy Statistics (DUKES) published 26 July 2012, summarises the energy industries contribution to the economy in 2011;

- 4.4% of GDP (increased from 3.9% in 2010);
- 10.1% of total investment (increased from 9.9% in 2010);
- 51.8% of industrial investment;
- 171,000 directly employed (7% of industrial employment);
- Many others directly employed e.g. estimated 207,000 in support of UKCS activities.

2.33 The energy industry plays a vital role in supporting the UK economy through investment and employment (both of which increased from 2010 to 2011) whilst also supporting local economies through employee spending and agricultural diversification. Whilst operational equipment including the drill rigs and production facilities come with a fully trained crew, many operators in the industry seek to employ suitably qualified local companies to undertake landscaping and site construction works, as well as using local suppliers for aggregates, temporary accommodation buildings, security fencing and other ancillary equipment. Furthermore, the industry also has an indirect impact on economic growth by providing the energy and infrastructure which is required to power UK businesses, homes and transport systems. The Government is therefore responsible for ensuring reliable supplies and investments are promoted and this is reflected in national energy policy.

3.0 NATIONAL ENERGY STRATEGY

National Policy on Energy and Need

3.1 National energy policy clearly identifies the need for additional oil and gas infrastructure in the UK, in order to improve energy security and market efficiency. The need for additional energy infrastructure and supplies is urgent, and this is recognised in the following national policy.

The Energy White Paper: "Meeting the Energy Challenge" (2007)

3.2 The Energy White Paper was published by the former DTI in May 2007. It sets out the Government's international and domestic energy strategy in response to growing evidence of the impact of climate change and the need to cut greenhouse gases, rising fuel prices, a growing awareness of the risks of relying upon oil and gas imports from a small concentration of countries, and the need for the market to make substantial new investment in power stations, the electricity grid and gas infrastructure.

3.3 The need to reduce carbon emissions whilst ensuring secure energy supplies means that for now, the UK cannot rely on renewable energy sources alone. In terms of promoting a diverse energy mix it is stressed by the White Paper that fossil fuels will continue to play an essential role in the UK's energy system for the foreseeable future. To ensure 'security of the supply' a crucial element of the Government's energy strategy is to maximise the economic production of our domestic energy sources which, together with the UK's energy saving measures, will help reduce our dependence on energy imports.

Overarching National Policy Statement for Energy (EN-1) (2011)

3.4 On 18th July 2011 the House of Commons debated and approved the six National Policy Statements for Energy (NPS). The energy NPS's set out national policy against which proposals for major energy projects will be assessed. Whilst the proposed development

is not classed as a major energy project, EN-1 adds context to the national overarching energy strategy.

3.5 In terms of future energy supply the Government states at page 30 of EN-1, that fossil fuels play a vital role in providing reliable electricity supplies and;

> **'….provide diversity in our energy mix. They will continue to play an important role in our energy mix as the UK makes the transition to a low carbon economy, and Government policy is that they must be constructed, and operate, in line with increasingly demanding climate change goals'.**

3.6 In regard to the need for further infrastructure, in particular gas related development, Government policy states at page 38 that:

> **'whilst the gas market is largely robust to a range of adverse events, the risk of shortfalls in supply cannot be ruled out, nor the risk that there may need to be significant rises in wholesale gas prices in order to balance the market. Further infrastructure – beyond that which exists or is under construction at present – will be needed in future in order to reduce supply or price risks to consumers'.**

3.7 At page 47, EN-1 accepts that a degree of flexibility is required in some instances where it may not be possible at the time of the application to finalise the precise details of the Proposed Development.

> **'Where some details are still to be finalised the ES should set out, to the best of the applicant's knowledge, what the maximum extent of the proposed development may be in terms of site and plant specifications, and assess, on that basis, the effects which**

the project could have to ensure that the impacts of the project as it may be constructed have been properly assessed'.

3.8 This is also referred to as the "Rochdale Envelope" which was established in Rochdale MBC Ex Parte C Tew 1999 and is a series of maximum extents of a project for which the significance of effects are established. The detailed design can then vary within this envelope without rendering the ES inadequate.

The Energy Act (2011)

3.9 On 18 October 2011, the Energy Bill received Royal Ascent and became the Energy Act 2011. The Energy Act is part of a step change from the Coalition Government to make energy more efficient for homes and businesses, and improve our energy framework to enable energy supplies from secure low carbon technology, and fair competition in energy markets.

3.10 Part 2 of the Act is entitled "Security of Energy Supplies" and Chapter 1, Part 79 sets out legislation for Ofgem to provide an Annual Report on "future demand for, and supply of, electricity in Great Britain" and under Part 80 what "electricity supply capacity is required". The first of these Annual Reports was published in 2010 and is considered below. Chapter 3 of the Act deals with "Upstream Petroleum Infrastructure" and Part 82 acknowledges that the Secretary of State should take into consideration "(f) the need to maintain security and regularity of supplies of petroleum".

Annual Energy Statement (2010)

3.11 The Annual Energy Statement (AES) published in 2010 acknowledges the mission of the Government to "support the transition to a secure, safe, low-carbon, affordable energy system in the UK". The AES at page 2, acknowledges the following;

"Demand for fossil fuels is set to increase with the huge rise in population and wealth of emerging economies. In parallel, as

> **recent events in the Gulf of Mexico have shown, the costs and risks of extracting fossil fuels from more remote locations are rising. With the UK's own oil and gas resources declining, unless we act now, we will become more vulnerable to high and volatile oil and gas prices".**

3.12 In securing oil and gas supplies, the Government acknowledges the use of new sources of gas (including shale gas) and notes that in light of the Deepwater Horizon incident, there is a need for "the highest standards of safety management and tough environmental standards" rather than a moratorium against such developments. The AES states that recent gas disputes in Europe only underline the importance of the need to improve our energy security, develop low carbon sources of supply while also reducing energy consumption. The AES notes that the UK's own indigenous supplies of oil and gas remain important and "we must maximise economic production while applying effective environmental and safety regulations" (page 9).

3.13 As a point of action (Action 11, page 10) the AES states that the forthcoming Energy Security and Green Economy Bill will seek to ensure that access to UK oil and gas infrastructure is available to all companies. The AES states that "this will help the exploitation of smaller and more difficult oil and gas fields, allowing us to make the most of our natural resources".

The Annual Energy Statement (2011)

3.14 The Annual Energy Statement (AES) was delivered by the former energy minister Chris Huhne, to Parliament on 23 November 2011, and describes the progress of the Coalition Government on their energy policies and emerging initiatives including the Green Deal. The AES reflects a crucial part of DECC's strategy to reduce the amount of energy we use. In respect of electricity, DECC are "working to secure Britain's energy supplies" and the AES notes that the UK needs "significant new investment in power plants and infrastructure to meet future demand".

3.15 The 2011 White Paper on electricity market reforms aims to attract infrastructure investment for a diverse mix of energy sources including "renewables, new nuclear and fossil fuels – including carbon capture and storage". Each of these energy sources is considered as being "important" and over the past year, the Government has "introduced a range of policies to support them".

3.16 In respect of technologies, the AES (2011) again highlights that "fossil fuels will remain important" and that "gas will continue to feature strongly in our energy mix" with Government policies being "designed to allow new gas plant to be built". The AES also recognises that from 2001 to 2009, fuel poverty doubled due to the increasing cost of fuel. The AES states that the energy sector also makes a significant contribution to employment and the economy, providing more than half of our industrial development. The AES concludes that the UK "must secure huge investment in our energy sector" to build the power plants that will fuel our prosperity and the infrastructure that will deliver it.

The Annual Energy Statement (2012)

3.17 The 2012 AES identifies "two immediate priorities for UK energy policy: upgrading our energy infrastructure in order to rebuild our economy, and putting households back in control of their energy bills" (page 6).

3.18 The AES acknowledges that there is a cautious investment climate but that "energy projects represent the largest infrastructure investment opportunity in the UK and make up nearly half the total infrastructure investment pipeline in the UK". In 2011, the energy industry "contributed 4.4% to UK GDP" and around £12.7 billion of investment and 22,800 jobs in the UK from 1 April 2011 to 31 July 2012 (page 7).

3.19 In respect of oil and gas, at page 7 the AES states that "the Government continues to offer new licences and develop the fiscal regime to encourage investment in indigenous

oil and gas production for the economy and security of supply". Moreover, the AES continues that;

> **"DECC will also support new ways of tapping our indigenous resources, where this proves economic, and subject to ensuring, through robust regulatory controls, that extraction can be carried out safely and with full regard for protection of the environment".**

3.20 The policy framework set out in the AES (2012) combined with other key strategic documents will show how the Government "will deliver a balanced energy policy acting to bring forward investment in every aspect of our energy infrastructure".

3.21 This includes investment in "new gas power plants, in maintaining UK oil and gas production" and "gas infrastructure" amongst other opportunities (page 8).

The National Planning Policy Framework (2012)

3.22 The National Planning Policy Framework (NPPF) was published in March 2012 and recognises that minerals "are essential to support sustainable economic growth and our quality of life". In this regard, the NPPF also states at paragraph 142 that;

> **"it is therefore important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs".**

3.23 At a national level, the need for modern energy infrastructure and the development of indigenous supplies is clearly supported through policy. This is further evidenced by a number of Government reports and research on energy mix, security of supply and demand which has been considered herein.

Summary

3.24 In light of the UK's growing dependency for imported fuel, UK onshore oil and gas production makes an important contribution to the national energy market, economic growth and employment, and securing supplies. Ensuring that the UK's domestic resources are used to their full potential is especially important considering the increased competition for energy resources in the face of growing global energy demand.

4.0A THE PROPOSED DEVELOPMENT

A4. Section Alterations

A4.1 This Section of the Revised Planning Statement has been updated in respect of the following:

- **Clarification of operations during Phase 3 Testing in the General Overview**
- **Clarifying and updating the Principal Elements of the Proposed Development**
- **Clarification of the 'worst case' scenario assessed in the ES and ES Addendum so that the likely significant effects on the environment would be no worse regardless of the rig specification and site layout chosen and confirmed pursuant to a planning condition.**

4.1 Having established a need for the development of our domestic oil and gas reserves and outlined the national energy strategy on the principles for their extraction, the purpose of this Section is to provide an overview of the Proposed Development. A full Project Description can be found in Chapter 4**A** of the accompanying **ES and ES Addendum**.

The Applicant

4.2 Celtique Energie Weald Ltd ("the Applicant") is an independent upstream Exploration and Production (E&P) company with a number of projects focused on onshore Europe including the UK, France, Germany, Poland and Switzerland. Celtique Energie is committed to the sustainable development of high quality energy infrastructure to ensure that reserves are developed responsibly and in an environmentally sensitive manner. Notwithstanding their other operations in Europe, Celtique Energie has a number of Petroleum Exploration and Development Licences (PEDLs) in the UK including Cheshire, the East Midlands and Southern England.

Why is the Applicant looking for oil and gas?

4.3 The Department for Energy and Climate Change (DECC) issues Petroleum Exploration and Development Licences (PEDL) to oil and gas companies under powers granted by the Petroleum Act 1998. The PEDL confers the rights to the oil and gas company to pursue a range of oil and gas exploration and development activities and to "search for, bore for and get hydrocarbons" within a geographical area covered by the Licence.

4.4 The PEDL does not confer any exemptions from other legal or regulatory requirements such as drilling and development consents, planning permission, landowner rights and health and safety approval. Oil and gas is widely used as a source of energy, and DECC expects Licences to be optimally worked to maximise the economic recovery of oil and gas and the development of our national resources.

Where is the Applicant looking for oil and gas?

4.5 The Applicant along with its joint venture partner, Magellan Petroleum (UK), was awarded PEDL 234 in July 2008 with both parties having a 50% interest in the Licence. At the same time both parties were also awarded with adjoining Licences PEDL 231 to the east and PEDL 243 to the west. PEDL 234 is a right angled or "L" shape Licence area covering 300 sq. km.

4.6 From east to west, PEDL 234 extends 20km from Easebourne to Broadford Bridge, and 10km from Dunsfold to Rudgwick. From north to south PEDL 234 runs 20km from Cranleigh to Fittleworth, and 10km from Northchapel to the south of Petworth. PEDL 234 encompasses part of what is referred to geologically as the Weald Basin which is located in southern England to the south of London, extending eastwards to northern France. PEDL 234 falls within the centre of the Basin and is referred to by the Applicant as the Central Weald Basin. The location of PEDL 234 including the Applicant's other southern England PEDL's, is identified in **Diagram 4.1** below;

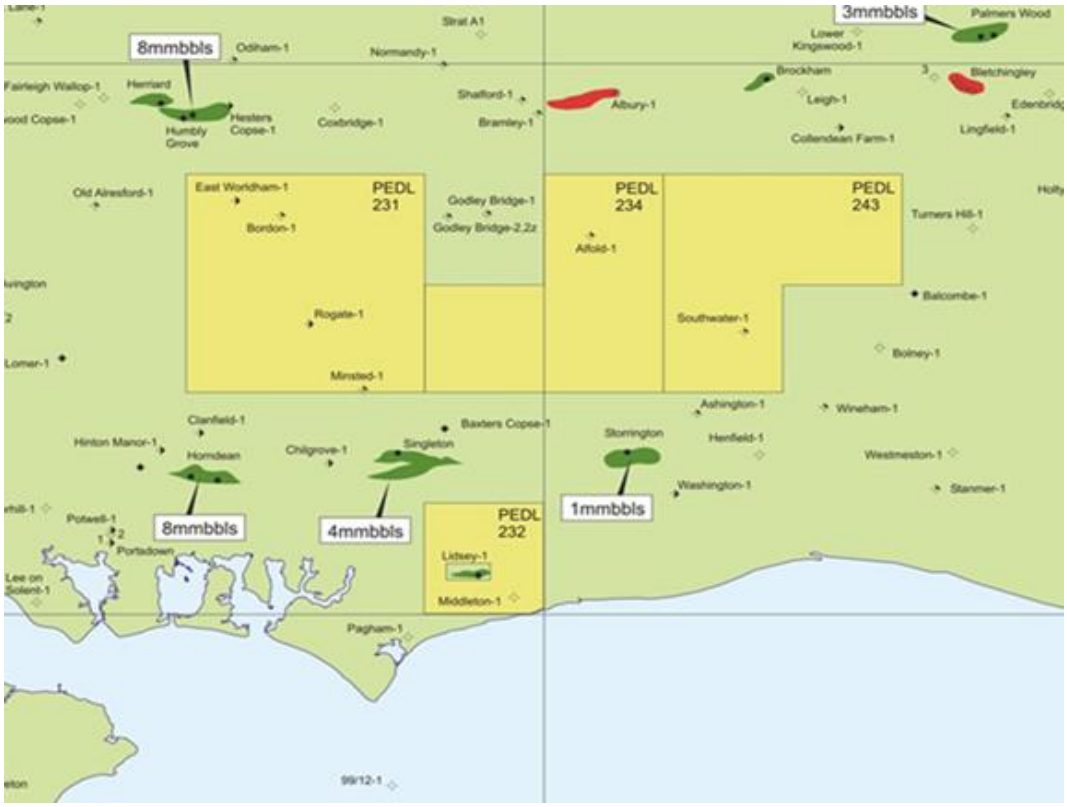


Diagram 4.1: Location Map of PEDL 234

4.7 **Diagram 2.1** also illustrates the historic and on-going level of oil and gas activity in other parts of the Weald Basin at Storrington, Horndean, Singleton and Humbly Grove.

What is special about the geology in PEDL 234?

4.8 Historic and more recent seismic surveys indicate that the Central Weald Basin may contain oil or gas accumulations within the Jurassic Limestones and Shales. Having evaluated seismic data of the underground rock structures in the Basin within PEDL 234, the Applicants geologists identified a large structure deep within the Basin. A section of seismic data for the Central Weald Licence area is shown in **Diagram 4.2**.

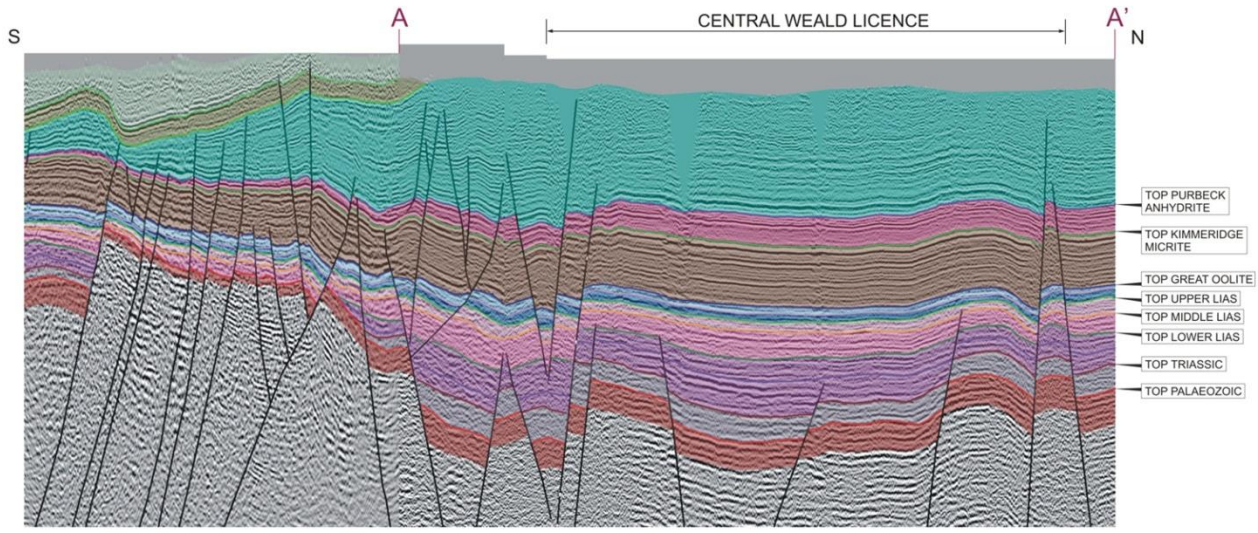


Diagram 4.2: Seismic data from the Central Weald Licence Area

4.9 This rock structure consists of Jurassic Limestones and Shales including Kimmeridge Limestone, the Great Oolite, Kimmeridge Clay and Liassic Shales which may hold oil or gas accumulations. Data gathered from historic and more recent wells predominantly from the edge of the Weald Basin combined with additional analysis by the Applicant, has identified the Kimmeridge Limestone as the "target reservoir" because it is:

- A thick, porous layer of rock
- Likely to be naturally fractured allowing the oil or gas to flow more freely
- Within the Kimmeridge Clay which is a prolific source rock
- At a depth that is likely to mean oil is mature
- Located within the centre rather than the edge of the Weald Basin.

4.10 The geology in this central area of the Weald is technically referred to as a "stratigraphic trap" which means that the internal structure of the geological formations and rock strata are preventing oil in the centre of the Weald Basin from escaping to the edges of the Basin where there are already wells. The characteristics or "lithology" of the rocks in the Weald Basin can be seen in **Diagram 4.3** below.

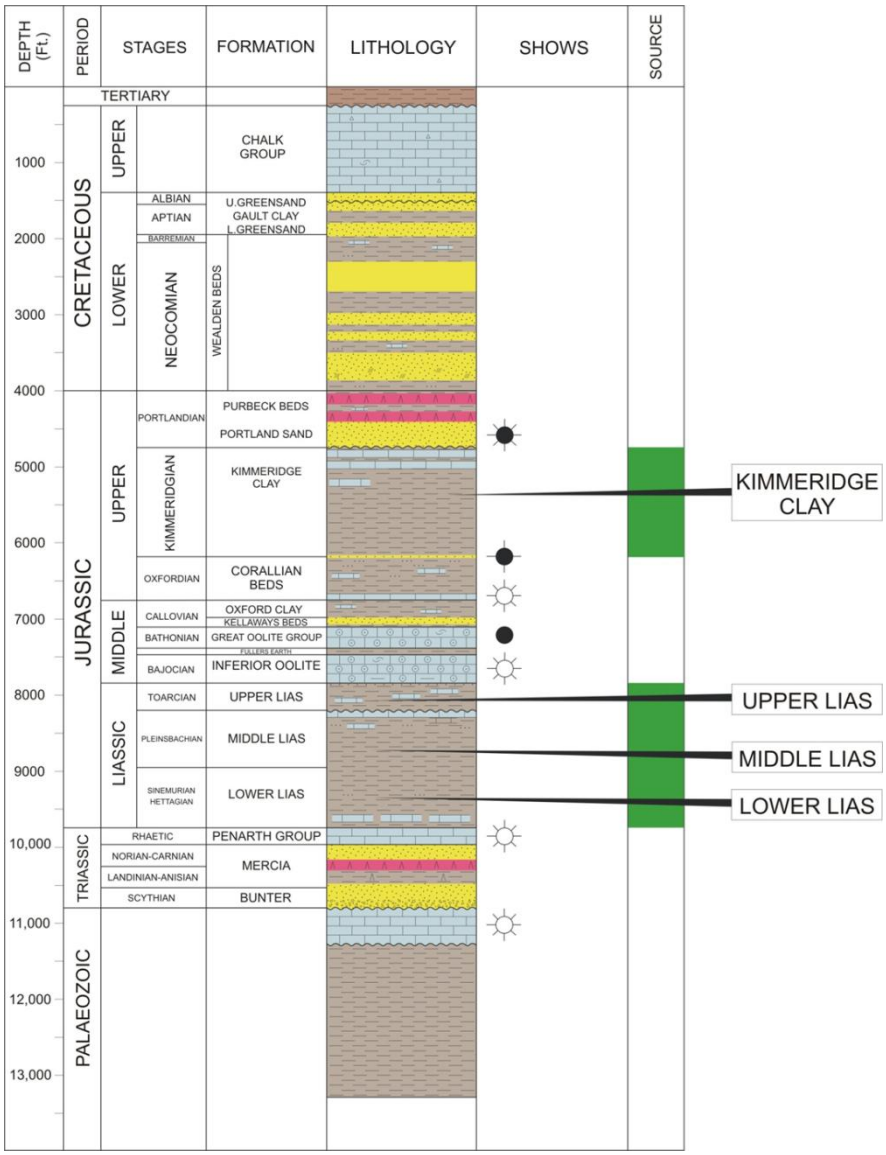


Diagram 4.3: Lithology of the Weald Basin

4.11 The Great Oolite is the secondary "target reservoir" in this area because it is unclear from geoscientific analysis if the stratigraphic trapping mechanism in this formation has occurred and if hydrocarbons have accumulated. If the stratigraphic trap has worked, it is likely that hydrocarbons will have accumulated in the rock formation. When the Great Oolite has been drilled by other operators in surrounding wells, the porosity of this rock has shown generally to be tight but where there has been porosity, there has been hydrocarbon shows. The porosity distribution of the Great Oolite is therefore uncertain, and coring this rock formation during drilling will gather information to enable a conclusion to be drawn on the potential for oil and gas extraction from this rock structure. From this evaluation it will be possible to establish whether hydraulic

fracturing might be required in the future although no hydraulic fracturing will be used as part of this exploration activity, and therefore does not form part of this planning application.

The Proposed Development

4.12 The Proposed Development involves the siting and development of a temporary well site compound and access road including all infrastructure, equipment and operations associated with the drilling of a vertical borehole and a contingent horizontal borehole from the same well, for the purposes of exploring for hydrocarbons, and the testing and evaluation of any discovered.

Hydraulic Fracturing

4.13 For the avoidance of doubt, this planning application is for a conventional well and does not seek permission for or require the use of hydraulic fracturing. The Applicant has made a commitment to never use hydraulic fracturing on this well – Wisborough Green-1, and it may be the case that hydraulic fracturing is not even required if hydrocarbons are free flowing.

4.14 Should permission be granted for the Proposed Development that is subject to this planning application and the results of the exploratory drilling indicate that hydraulic fracturing would be required to allow production of hydrocarbons, planning permission would be sought for the drilling of a new well. The drilling of a new well and the use of hydraulic fracturing would be subject to further planning approval and all other permitting and regulatory consents including those from the Environment Agency and DECC.

General Overview

4.15 The Proposed Development would begin with the construction of the temporary well site compound and access road before a drilling rig is mobilised on site. Initially a vertical

well will be drilled to explore for the presence of hydrocarbons, and if encountered a short term test may be undertaken to assess their commercial viability. If no hydrocarbons are discovered or the short term tests indicate that the hydrocarbons are not commercially viable, the site will be restored.

4.16 ~~Should short term testing of the vertical well be inconclusive,~~ **A** horizontal well may be drilled from the **then** existing vertical well. The horizontal well is contingent on the results of the vertical well and ~~may~~ **if it is drilled would** be drilled **by the same rig on location** immediately after the vertical well **and any testing**~~, or up to 12 months later if further analysis of data from the vertical well is required~~. If a horizontal well is drilled and oil is discovered, ~~either short term testing or~~ an Extended Well Test (EWT) ~~will~~ **may** be undertaken to confirm the commercial viability of the hydrocarbons. Having ~~completed testing of~~ **drilled** the vertical and/or horizontal well, a decision will be made by the Applicant to either restore the site or retain it whilst a planning application is submitted to WSCC for appraisal and/or production under a DECC approved field development programme.

Principal Elements of the Proposed Development

4.17 In general terms, the Proposed Development consists of the following engineering operations, equipment and infrastructure:

i) Site clearance involving the excavation and storage of top soil;

ii) Construction of temporary earth bunds on the northern and eastern boundaries of the well site compound to store excavated topsoil and subsoil;

iii) Construction of the access track using tarmac ~~at the entrance~~ and **graded**, crushed stone delivered by HGVs, for its length;

iv) Construction of a temporary well site compound using crushed stone over an impermeable geotextile membrane and including security gate and fencing, an interceptor ditch and small retaining bund;

v) Creation of a staff car park to provide up to 12 spaces within the compound but outside of the drilling area;

vi) Erection of ~~eight~~ portable cabins providing temporary office accommodation, living accommodation for ~~2~~ **four** key personnel **and seven security personnel** who need to be on-site to provide 24hr supervision, plus canteen, toilet and shower facilities for the crews;

vii) Portable skips for on-site refuse collection;

viii) On-site water storage tanks and a separate dedicated fire water supply of ~~at least~~ **up to** 50m³;

ix) Construction of a concrete chamber **and setting of 30" casing at a depth of 20ft,** sunk into the ground (**forming** the "cellar") **followed by 20"** ~~to include large diameter~~ conductor pipe which will be pre-set using **a conductor setting rig** to a depth of ~~around~~ **up to** ~~65ft~~ **200ft**. The **main** drilling rig will be placed over the cellar, and the well will be drilled through the conductor pipe;

x) Delivery of a drilling rig, most likely a 750 - 1,000 horsepower rig with ~~around~~ a ~~45m~~ mast of **up to 45m above ground level** including substructure from ground level, and all infrastructure and equipment associated with the drilling of an exploration well including cabins, storage containers and lighting;

xi) The installation of purpose built tanks for the temporary storage of drilling mud and rock cuttings;

xii) External lighting to the drilling rig illuminating of the mast, the rig floor, mud tanks and pumps, ~~catwalk, doghouse and site cabins~~ **and ancillary site infrastructure;**

xiii) The use of noise attenuation and dust control measures including effective silencers and wheel ~~washing~~ **cleaning** facilities; ~~the~~

xiv) Mobilisation of ancillary testing equipment and carrying out of ~~either~~ a short term **and/**or an extended well test (EWT); and

xv) The retention or restoration of the site (as applicable).

4.18 The precise specification of the drilling rig will not be known until a contractor has been selected, although is likely that the rig will be a 750-1,000 horsepower rig with a mast of up to 45m above ground level including the substructure. On this basis, the worst case scenario has been assessed in the ES **and ES Addendum** (the "Rochdale Envelope"

principle). **The built development will not exceed these parameters in accordance with the "Rochdale Envelope" principle, but a degree of flexibility is required before a rig is chosen and the detailed design is finalised via a Condition to be approved by WSCC prior to the commencement of any development on site. This approach would be consistent with other planning permissions for exploratory well sites in WSCC; namely applications WSCC/011/12/SO/SDNP and SO/3152/07 at Markwell's Wood and BN/31/05 at Lidsey.**

Phasing of the Proposed Development

4.19 The Proposed Development can be broadly separated into four Phases – construction, rig mobilisation and drilling, testing and aftercare and broken down into sub-Phases, where appropriate (**Table 4.1**).

Table 4.1: Phases and Sub-Phases of the Proposed Development

Phases of the Proposed Development	
Phases	**Sub-Phases**
Phase 1: Construction	-
Phase 2: Mobilisation and drilling	-
Phase 3: Testing	~~Phase 3a: Testing (gas)~~ -
	~~Phase 3b: Testing (oil)~~ -
Phase 4: Aftercare	Phase 4a: Restoration
	Phase 4b: Retention

4.20 The Phases may not be carried out continuously for a number of reasons such as, but not limited to, the availability of a rig or the undertaking of further data analysis. The applicability of the Phases is also dependent upon whether hydrocarbons are encountered or not. A full description of the Proposed Development is contained in Chapter 4**A** of the accompanying ES **and ES Addendum**.

5.0 SITE AND SURROUNDINGS

5.1 The aim of this Section is to describe the baseline characteristics of the Application Site and its surroundings. This Section provides an overview of the existing conditions with more detailed descriptions provided in the ES which accompanies this planning application.

Application Site

5.2 The Application Site falls within the jurisdiction of West Sussex County Council and Chichester District Council, and the boundary of the South Downs National Park is approximately 500m south of the Application Site beyond the River Kird.

5.3 The Application Site lies between the villages of Wisborough Green approximately 1.2km to the south east, and Kirdford approximately 1.8km to the west. The Application Site falls within the Ward of Wisborough Green and the Parish of Kirdford. Other settlements in the vicinity of the Application Site include the villages of Cranleigh (11.6km north), Billingshurst (4.5km east) and Pulborough (8.1km south), and the towns of Petworth (7.5km south west) and Horsham (12km north east).

5.4 The Application Site currently forms part of an intensively managed arable field which is used for growing cereal. Under the Agricultural Land Classification system, the Application Site is classed as Grade 3 although there is no information available on the subsection classification - Grade 3a or 3b. The Application Site is not subject to any international, national or local designations, and there are no Public Rights of Way (PROW) on the Site.

5.5 Access to the Application Site is obtained from Kirdford Road and through an existing metal post and rail agricultural field gate which adjoins an existing wooden post and rail boundary fence. The existing access track is loosely stoned from the junction with Kirdford Road which is tarmaced, and there are ditches either side of the entrance road. There are four common oak trees adjacent to the existing agricultural gate, the crowns

of which overhang the Application Site, and two soil heaps between the access and proposed well site compound.

5.6 Sloping downwards from south (20.5m AOD) to north (16.5m AOD), the Application Site falls relatively evenly along the western and eastern boundaries. From the access point on Kirdford Road which lies at 18m AOD, the existing access track rises gently to 19.5m AOD at the south western corner of the Application Site which encompasses the proposed well site compound.

5.7 There are no important aquifers under the Application Site, and it is not in an area where people use water from aquifers for water supply, either public or private. The Application Site is located on the southern side of the Weald Basin, and is underlain by Weald Clay which contains minor and sometimes discontinuous bands of sandstone.

Surroundings

Vegetation and Woodland

5.8 The Application Site is situated within an intensively managed arable field which is used for growing cereal. The field margins are managed as semi-improved grass headlands. Both invasive and rare plants have been recorded within 1km of the Application Site including Japanese Knotweed and true fox-sedge. On the northern boundary of the Application Site is Northup Copse which is designated as ancient woodland comprising of oak, hazel, birch, ash and field maple, with the ground flora consisting of bluebell and ground ivy. There are no Tree Preservation Orders on or adjacent to the Application Site.

5.9 Notwithstanding the designated ancient woodland to the north of the Application Site at Dunhurst Copse and Northup Copse, there are further blocks of ancient woodland to the east, south and west. Skiff Copse lies to the east abutting the River Kird with Nonesuch, Woodfield and Jacksland Copses to the south providing a buffer between Northup field, within which the Application Site lies, and the South Downs National Park. Kiln Copse

and Furzefield Rough to the north west are designated as ancient woodland, with the latter being adjacent to Dunhurst Copse.

Landscape

5.10 By day, the Application Site is generally screened on the northern boundary by the dense woodland of Furzefield Rough, Northup Copse and Dunhurst Copse with Nonesuch, Woodfield and Jacksland Copse providing screening on the southern boundary of Northup field with further woodland screening provided by Idehurst Copse to the south.

5.11 There are a number of residential and agricultural properties within the locality of the Application Site, however, other than the large barn located directly adjacent to the Site, these are generally not visible from the Site itself owing to the tree cover around the perimeter of the Site. There are electricity pylons which run in a southwest to northeast direction through the south eastern quadrant of the field within which the Application Site falls.

5.12 By night, the rural nature of the immediate vicinity is confirmed with the Application Site itself and the surrounding woodland and farmland, being in total darkness. The local network of "B" roads and country lanes has no street or road lighting although there are localised areas of lighting affording to private developments and residential properties within Wisborough Green and its surrounding agricultural properties.

Topography

5.13 To the north the land falls downwards to Boxal Brook rising up within the woodland of Northup Copse. To the east, the land falls to the Brook before rising gradually beyond Skiff Copse and towards Wisborough Green village. To the south, beyond the River Kird the land rises gradually towards Idehurst Copse and the A272. To the west the land lies relatively flat although it is lower lying towards the river, and rises beyond this towards Kirdford village.

Access and Public Rights of Way

5.14 The closest PROW to the Application Site includes a footpath (PROW ref. 768) approximately 100m to the north, running in a westerly direction from its junction with Kirdford Road towards Kirdford. A second PROW, a bridleway (PROW ref: 2851/1) is 625m to the west, running in a westerly direction for 125m and then turns running northwards. A third PROW lies at approximately 625m from the Application Site and runs between Kirdford Road and a small lane off the A272 on the western edge of Wisborough Green.

5.15 The Application Site is directly accessed from Kirdford Road which is a single carriageway road that connects Wisborough Green/A272 to the south with Kirdford to the west. The route continues westwards after Kirdford to connect with Petworth. Kirdford Road in the vicinity of the Assessment Site is rural in nature being derestricted and unlit. It is generally between 4m and 6m wide and there are no weight restrictions on Kirdford Road between Wisborough Green and the Application Site.

5.16 Within Wisborough Green there are a number of side roads accessed from Kirdford Road together with residential frontage and driveway accesses. The speed restriction is 30mph with limited street lighting. As Kirdford Road enters Wisborough Green it skirts the north of a cricket ground, and at this point footways are provided which when combined with footpaths within Wisborough Green, provide continuous segregated facilities for pedestrians throughout the majority of Wisborough Green.

5.17 The A272 is the main east-west route through West Sussex and the wider region. In the local context it connects Petworth, Petersfield and the A3 to the west of the Application Site with Billingshurst, Haywards Heath and the A23 and A24 to the east. The A272 is a single carriageway road with one lane in each direction. It is predominantly rural in nature being generally derestricted and unlit, and there are no continuous footways along the route.

Designated Sites

5.18 The Mens including Idehurst Copse, is designated as a Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC). It is approximately 500m to the south of the Application Site and is designated for its fungal and lichen species, structural diversity and size. The South Downs National Park (SDNP) lies approximately 500m south of the Application Site and represents a chalk downland landscape with heavily wooded sandstone and clay hills.

5.19 Dunhurst Copse and Northup Copse Sites of Nature Conservation Importance (SNCI) are adjacent to the northern boundary of the Application Site and are designated as ancient woodland. Part of The Mens is also designated as a SNCI.

Archaeology and Cultural Heritage

5.20 The Wisborough Green Conservation Area is focused on the village centre approximately 1.1km east of the Application Site. There are no Scheduled Monuments (SM) within 1km of the Application Site although there are two within 3km of the Application Site including Wephurst Glass House which is 2.8km to the northwest, and Brownings Moated Site which is 2.5km to the southwest.

5.21 There are a number of Listed Buildings in the surrounding area including four within a 1km radius of the Application Site, all of which are Grade II Listed. The closest Listed Building to the Application Site is Skiff Farmhouse, an 18th century or earlier building which stands circa 350m to the east on Kirdford Road. Two of the Listed Buildings stand at Sparr Farm on Skiff Lane approximately 650m to the northwest of the Application Site. This includes Sparr Farmhouse which is of 17th century construction or earlier whilst its barn dates to the 18th century. Barkfold House is the fourth Listed Building which although built in the early 19th century at the wide bend in Kirdford Road to the west of the Application Site, it incorporates an L-shaped portion that dates to the 17th century.

Hydrology and Hydrogeology

5.22 The northern boundary of the Application Site is located approximately 100m south of Boxal Brook which flows south-eastwards to join the River Kird at Skiff Copse. The River Kird runs from east to west, and falls on the southern boundary of the field separating it from the border of the South Downs National Park. A tributary of the River runs around the eastern boundary of the field joining Boxal Brook to the north.

5.23 The Application Site is classified as having a "Low Probability" of flooding with less than 1 in a 1,000 year annual probability of flooding. The Application Site lies on higher ground, 100m south of Boxal Brook and outside of the 1 in 100 year flood extent.

5.24 There are no important aquifers under the Application Site, and it is not in an area where people use water from aquifers for water supply, either public or private. Groundwater in the Weald Clay is unclassified chemically or quantitatively which is indicative of its general status as unproductive strata.

Geology

5.25 The Lower Cretaceous Weald Basin basins dip southwards towards the South Downs where they become overlain by younger Lower Greensand and Chalk sequences. Arun Terrace deposits are present in patches to the south and south-east of the Application Site. There is a thin strip of alluvium associated with Boxal Brook which extends as far as the northern boundary of the Application Site. The Wealden Beds are underlain by a progressively older sequence of Mezonic and Palaeozoic strata.

6.0A NATIONAL PLANNING POLICY

A6. Section Alterations

A6.1 This Section of the Revised Planning Statement has been updated in respect of the following:

- **Deletion of archived technical planning guidance to the NPPF**
- **The addition of recently published Planning Practice Guidance (2014)**

National Planning Policy Framework (2012)

6.1 The National Planning Policy Framework (NPPF) was published in March 2012 and sets out the Government's requirements for the planning system. The principle objective of the NPPF is a presumption in favour of sustainable development which should be seen as a "golden thread" running through both plan-making and decision-taking. In regard to the determination of planning applications this means:

> **"approving development proposals that accord with the development plan without delay; and**
>
> - **where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:**
> - **any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or**
> - **specific policies in this Framework indicate development should be restricted"** (paragraph 14).

6.2 At paragraph 115, the NPPF makes clear that "great weight should be given to conserving landscape and scenic beauty" with National Parks, the Broads and AONB's having the highest status. The NPPF also states that "the conservation of wildlife and cultural heritage are important considerations in all these areas" and in National Parks and the Broads should be given "great weight".

6.3 The NPPF at paragraph 116 states that "planning permission should be refused for major development in these designations" unless there are "exceptional circumstances and where it can be demonstrated they are in the public interest". Such applications are expected to consider;

- **"the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;**
- **the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and**
- **any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated".**

6.4 The NPPF also recommends at paragraph 118 that in determining applications local planning authorities should consider the following principles for the conservation and enhancement of biodiversity;

- **"if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;**
- **proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect**

on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest;

- **development proposals where the primary objective is to conserve or enhance biodiversity should be permitted;**
- **opportunities to incorporate biodiversity in and around developments should be encouraged;**
- **planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss; and**
- **the following wildlife sites should be given the same protection as European sites:**
    - **potential Special Protection Areas and possible Special Areas of Conservation;**
    - **listed or proposed Ramsar sites; and**
    - **sites identified, or required, as compensatory measures for adverse effects on European sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites".**

6.5 With the exception of waste, the NPPF replaces most of the planning policy guidance notes and planning policy statements including Minerals Policy Statement 1 (Planning and Minerals) and Minerals Policy Statement 2 (Controlling and Mitigating the Environmental Effects of Minerals Extraction in England).

6.6 Section 13 of the NPPF (pages 32-36) covers minerals development and stresses the essential role that minerals plays in encouraging "sustainable economic growth". The Framework seeks to ensure that there is "sufficient supply of material to provide the infrastructure, buildings and energy and goods that the Country needs". The NPPF also acknowledges that "minerals are a finite resource" and can "only be worked where they are found" (paragraph 142).

6.7 In determining mineral planning applications the NPPF states, at paragraph 144, that local planning authorities should;

- **"give great weight to the benefits of the mineral extraction, including to the economy;**
- **ensure, in granting planning permission for mineral development, that there are no unacceptable adverse impacts on the natural and historic environment, human health or aviation safety, and take into account the cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality;**
- **ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source and establish appropriate noise limits for extraction in proximity to noise sensitive properties;**
- **provide for restoration and aftercare at the earliest opportunity to be carried out to high environmental standards, through the application of appropriate conditions, where necessary. Bonds or other financial**

guarantees to underpin planning conditions should only be sought in exceptional circumstances ..."

6.8 Further to the considerations above, when planning for on-shore oil and gas developments including unconventional hydrocarbons, the NPPF states at paragraph 147 that Minerals Planning Authorities should also;

"… clearly distinguish between the three phases of development (exploration, appraisal and production) and address constraints on production and processing within areas that are licensed for oil and gas exploration or production".

~~**Technical Guidance to the National Planning Policy Framework (2012)**~~

~~6.9 Technical Guidance on the NPPF was published in March 2012, and provides additional guidance to local planning authorities on the effective implementation of mineral extraction policies in the NPPF.~~

~~6.10 The Technical Guidance states that Mineral Planning Authorities are "expected to ensure that plan proposals do not have an unacceptable adverse effect on the natural or historic environment or human health" (paragraph 20). The guidance advises that a programme of works should be agreed "which takes account, as far as is practicable, of the potential impacts on the local community over the expected duration of operations". The Technical Guidance accepts that in locating plant and establishing the programme of work, both the proximity of mineral workings to occupied properties and legitimate operational considerations must be taken into account (paragraph 21).~~

~~6.11 In respect of dust and air quality, advice in the Technical Guidance makes it clear that measures should be put in place to ensure that "unavoidable dust emissions are controlled, mitigated or removed at source" (paragraph 23). It is not anticipated that the Proposed Development will give rise to significant dust emissions. However standard~~

~~industry measures such as wheel washing will be employed to ensure compliance with appropriate environmental standards.~~

6.12 ~~Advice on noise emissions echoes that of dust and air quality with the Technical Guidance making it clear that "unavoidable noise emissions are controlled, mitigated or removed at source" (paragraph 28). Applicants are expected to carry out noise assessments to identify all sources of noise and consider;~~

- ~~**"the main characteristics of the production process and its environs, including the location of noise sensitive properties;**~~
- ~~**proposals to minimise, mitigate or remove noise emissions at source;**~~
- ~~**assessing the existing noise climate around the site of the proposed operations, including background noise levels at nearby noise sensitive properties;**~~
- ~~**estimating the likely future noise from the development and its impact on the neighbourhood of the proposed operations;**~~
- ~~**monitoring noise emissions to ensure compliance with appropriate environmental standards"** (paragraph 29).~~

6.13 ~~The Technical Guidance, at paragraph 30, advises that Mineral Planning Authorities should "aim to establish a noise limit at the noise sensitive property that does not exceed the background level by more than 10dB(A)" and should be subject to a maximum of 55dB(A)LAeq, 1h (free field). However the Technical Guidance also accepts that "in many circumstances it will be difficult to not exceed the background level by more than 10dB(A) without imposing unreasonable burdens on the mineral operator". Where this is not possible, the noise limit "should be as near that level as practicable during normal working hours (0700-1900) and should not exceed 55dB(A)Laeq, 1h (free field). Night time noise limits should not exceed 42dB(A) LAeq, 1h (free field) at noise sensitive dwellings.~~

6.14 It is established in the Technical Guidance that "all minerals operations will have some particularly noisy short term activities that cannot meet the limits set for normal operations" but that these can bring longer term environmental benefits (paragraph 31). Where it is essential to facilitate these works as it is clear they will bring longer-term environmental benefits, increased temporary daytime noise limits of up to 70dB(A)LAeq 1h (free field) for periods of up to 8 weeks will be considered. In summary, the findings of the noise assessment showed that the predicted noise levels from on-site operations were below permissible noise limits, for all phases of the Proposed Development, thus a negligible effect is expected.

Planning practice guidance for onshore oil and gas (2013)

Paragraph 1-4

6.15 In July 2013 DCLG released a planning practice guidance document for onshore oil and gas developments which acknowledges that minerals "make an essential contribution to the country's prosperity and quality of life" underpinning "key aspects of modern society" and remaining "an important part of the UK's energy mix whilst the country transitions to low carbons energy supplies". The guidance is "not intended to replace the need for judgement by minerals planning authorities" and those making planning applications".

Paragraph 6

6.16 The Guidance accepts that minerals have a number of special characteristics that are not present in other forms of development, including;

- **minerals can only be worked (i.e. extracted) where they naturally occur, so location options for the economically viable and environmentally acceptable extraction of minerals may be limited**
- **working is a temporary use of land, although it often takes place over a long period of time;**

- **working may have adverse and positive environmental effects, but most adverse effects can be mitigated;**
- **since extraction of minerals is a continuous process of development, there is a requirement for routine monitoring, and if necessary, enforcement to secure compliance with conditions that are necessary to mitigate impacts of mineral working operations; and**
- **following working, surface land should be restored to make it suitable for beneficial after-use".**

~~Paragraph 11-12~~

~~6.17 The exploratory phase of drilling involves the acquisition of "geological data to establish whether hydrocarbons are present" and prior to drilling, operators may wish to collate existing information including;~~

- **"existing geological and other relevant data;**
- **information from earlier drilling for oil, water, coal or other minerals and mining or quarrying activities;**
- **information on aquifers and groundwater resources; seismic reflection, gravity and magnetic surveys and remote sensing data e.g. satellite photographs, and results of previous seismic surveys."**

~~Paragraph 29~~

~~6.18 The planning system controls the development and use of land and should focus on "whether the development itself is an acceptable use of the land" and not the control of processes, health and safety issues or emissions which are "subject to approval under other regimes" and the minerals planning authority should assume "that these non-planning regimes will operate effectively".~~

Paragraph 34 36

6.19 The Guidance recommends a number of parties who can be involved at the pre-application stage including "the minerals planning authority; statutory and non-statutory consultees; elected members; and local people". In undertaking pre-application consultation, the prospective operator;

> **"would not necessarily be expected to provide all of the information that would accompany a formal planning application, but it needs to be sufficient information to allow the minerals planning authority to take an informed view."**

6.20 It is important to involve statutory consultees in pre-application engagement as they will provide advice to the minerals planning authority on the application, with non-statutory consultees also having an important role. In particular "the Environment Agency strongly recommends that prospective operators undertake pre-planning and pre-permitting discussions with them".

Paragraph 49

6.21 Notwithstanding the three phases of development – exploration, appraisal and production, "the precise nature of what is included in an application for exploration will depend in part on the applicant". In respect of the works undertaken;

> **"All exploratory phases will involve drilling vertically downwards, perhaps including directional drilling. However, the exploratory phase may include horizontal drilling once the appropriate rock formation is reached".**

6.22 It is also recommended that as practical as it is to do so "any application for exploratory drilling should cover as much of the exploratory activity as possible, including the likely

~~number of wellheads and extent of drilling, to avoid further planning applications at a later date".~~

~~Paragraph 61~~

~~6.23 An Environmental Impact Assessment is expected to cover the above and below ground area where the impacts may occur. "This is likely to be a broader area than the application area".~~

~~Paragraph 65~~

~~6.24 In respect of the need for the development, the Guidance states that when determining planning applications;~~

> ~~**"mineral planning authorities should not consider demand for, or consider alternatives to, oil and gas resources when determining planning applications. Government energy policy makes it clear that energy supplies should come from a variety of sources. This includes onshore oil and gas, as set out in the Government's Annual Energy Statement".**~~

~~6.25 An appraisal of the Proposed Development and National Planning Policy is provided in Section 9.0 of this Report.~~

Planning Practice Guidance (2014)

6.26 **The Planning Practice Guidance (PPG) was published by DCLG in March 2014 incorporating revised and updated practice guidance to sit alongside the NPPF, with the Technical Guidance to the NPPF subsequently being archived.**

Minerals Overview

6.27 **The PPG acknowledges that natural concentrations of minerals may have economic interest but that they also make "an essential contribution to the country's prosperity and quality of life". Planning for minerals involves a number of characteristics that are not present in other developments because they can only be worked where they naturally occur but it is a temporary use. Whilst operations may have adverse and positive effects (although some adverse effects can be mitigated), routine monitoring is required and restoration should provide a beneficial after use.**

Assessing environmental impacts from minerals extraction

6.28 **Significant environmental impacts are best assessed through an Environmental Impact Assessment (EIA). Planning Authorities and other regulatory regimes are separate but complementary. The Planning Authority control the development and use of the land taking account of any effects including those on noise, light, or air amongst others, whilst regulatory bodies consider the control process and health and safety issues that are subject to approval or permitting such as mining waste, surface water and groundwater. The work of one party should not be duplicated during the planning process or vice versa. Cumulative impacts should be considered by the Planning Authority along with the effective, justified and reasonable separation distances from occupied residential properties, and other mitigation measures.**

Air Quality

6.29 **Planning Practice Guidance (PPG) was formally issued in March 2014 (DCLG, 2014). It provides guiding principles on how planning can take account of the impacts of new development on air quality. The guidance sets out the types of developments for which air quality may be a relevant consideration. It covers the information that may be required in an air quality assessment and how considerations about air quality fit into the development management process. The PPG also provides guidance on options for mitigating air quality impacts, and provides examples of the types of**

measures to be considered. In particular it notes that: *"mitigation options where necessary, will be locationally specific, will depend on the proposed development and should be proportionate to the likely impact."*

Biodiversity, ecosystems and green infrastructure

6.30 **The PPG makes clear that "information on biodiversity impacts and opportunities should inform all stages of development (including, for instance, site selection and design including an pre-application consultation) as well as the application itself." Pre-application discussions to agree the scope of works for the ecological surveys is necessary before the planning application is made.**

6.31 **Local understanding of ecological networks is required to lead biodiversity enhancements and should seek to include habitat restoration re-creation and expansion, improved links, buffering of sites, new biodiversity features and securing management for long term enhancement. The mitigation hierarchy at paragraph 118 of the NPPF recommends three steps - avoidance, mitigation and compensation, and the PPG makes clear that only when an application cannot satisfy the hierarchy should it be refused.**

Groundwater

6.32 **The Planning Practice Guidance (PPG) was published by DCLG in March 2014 and sets out revised and updated practice guidance alongside the NPPF. Further to the Onshore Guidance, the PPG also makes clear that the planning authority should consider if the proposal is an acceptable land use rather than focusing on control processes. Whilst control processes and permitting should be left to regulatory agencies, the guidance does identify the potential for contamination of land as being an environmental issue that planning authorities should address.**

Lighting

6.33 **The Planning Practice Guidance (PPG) was published by DCLG in March 2014 and updates previous practice guidance in light of the NPPF. The PPG accepts that artificial lighting provides valuable benefits to society but can cause light pollution unless the best use of artificial lighting is made by getting "the right light, in the right place and providing light at the right time". The PPG accepts that lighting schemes can be costly and difficult to change so getting the design right and setting appropriate Conditions is important. Planning Authorities may need to consider where and when the light shines, how much and any possible ecological impacts.**

6.34 **Light spill can be managed through good design, correct installation and maintenance combined with the positioning and use of lighting that is suitable for the purpose and does not exceed requirements, bearing in mind both safety and ecological impacts.**

Noise Emissions

6.35 **The PPG on minerals states that a noise assessment should identify all sources of noise and, for each source, take account of the noise emission, its characteristics, the proposed operating locations, procedures, schedules and duration of work for the life of the operation, and its likely impact on the surrounding neighbourhood.**

6.36 **The PPG refers to the Noise Policy Statement for England (NPSE) which has three stated aims: to avoid significant adverse impacts on health and quality of life from environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development; to mitigate and minimise adverse impacts on health and quality of life from environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development; and where possible, to contribute to the improvement of health and quality of life through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development.**

6.37 **The PPG states that proposals for the control or mitigation of noise emissions from minerals sites should consider several factors, including:**

- **the main characteristics of the production process and its environs including the location of noise-sensitive properties;**
- **assessing the existing noise climate around the site including background noise levels at nearby noise-sensitive properties;**
- **estimating the likely future noise from the development, and its impact;**
- **proposals to minimise, mitigate or remove noise emissions at source; and**
- **monitoring noise emissions to ensure compliance with appropriate environmental standards.**

6.38 **The concepts of 'no observed effect level', 'lowest observed adverse effect level', and 'significant observed adverse effect level' (NOEL, LOAEL and SOAEL) as applied by the WHO are introduced by the NPSE and referred to by the PPG, although no specific guidance is provided.**

6.39 **Mineral Planning Authorities are encouraged to establish a noise limit through appropriately worded planning Conditions, and the PPG outlines a series of noise levels but accepts that some short term noisy activities which may not be otherwise allowed, may be necessary to facilitate mineral developments.**

Transport

6.40 **The PPG proposes that Local Authorities make a judgement as to whether development will generate significant amounts of movement on a case by case basis. Local Authorities are expected to take into account local policies, the scale of the development and potential trip generation, existing transport intensity, proximity to designations, impact on other priorities or strategies, cumulative impacts and the focus of any particular impacts.**

Dust Emissions

6.41 **Where dust emissions are likely to arise, assessment should consider the baseline conditions, activities that could lead to dust emissions, any parameters which may increase dust, recommend mitigation or design measures and make proposals to monitor and report dust.**

Landscape Strategy

6.42 **Landscape strategies should define key landscape opportunities, degrees of visual exposure, the need for additional screening and options for restoring the site.**

Restoration and Aftercare of mineral sites

6.43 **Responsibility for the restoration and aftercare of the site is the responsibility of the minerals operator, and a programme of works should be agreed with the Minerals Planning Authority to ensure the site is suitably restored to a beneficial after use. The PPG concludes that this can be controlled and achieved through suitably worded planning Conditions.**

Planning for Hydrocarbon Extraction

The Phases of onshore hydrocarbon extraction

6.44 **The term "extraction" encompasses the three phases of onshore hydrocarbons development – exploration, appraisal, and production. The exploratory phase to which this application relates, seeks to acquire geological data to establish whether hydrocarbons are present using existing and other geological information and data to assess the potential location of hydrocarbons before carrying out exploratory drilling which generally lasts 12 – 25 weeks.**

The Planning Application Process

6.45 **There are a series of regulatory regimes that are not covered by the Minerals Planning Authority and should be left to the appropriate party. For example pollution control measures fall to the Environment Agency (EA) for mining waste, surface water and groundwater, well design and construction is the responsibility of the Health and Safety Executive, and flaring or venting of gas is subject to DECC controls. The role of land use and development is the responsibility of the Minerals Planning Authority and the work of other regulatory regimes should not be duplicated during the planning process, or vice versa.**

Environmental Impact Assessment

6.46 **Applications for exploration may fall under Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 although an exploration application that does not involve hydraulic fracturing is unlikely to require an EIA. In addition, individual applications should be considered on their own merits and should not consider hypothetical future scenarios.**

Determining the Application

6.47 **Government energy policy makes clear that energy supplies should come from a variety of sources including onshore oil and gas, and Mineral Planning Authorities should take this into account. Appropriate planning Conditions should be used to militate against any adverse environmental impacts.**

7.0 THE DEVELOPMENT PLAN

7.1 Planning applications for mineral developments are dealt with by the County planning authority, and the Development Plan consists of planning policy from the County and local or District authority. In this case, West Sussex County and Chichester District Councils.

County Planning Policy

West Sussex Minerals Core Strategy

7.2 In light of proposed changes to the planning system under the Coalition Government including the publication of the Localism Bill and the revocation of Regional Spatial Strategies, West Sussex County Council has suspended work on the West Sussex Mineral Core Strategy. The Minerals Core Strategy Preferred Options were published in January 2007 and therefore hold little weight in the determination of planning applications. The planning application will therefore be considered below in the context of the adopted Minerals Local Plan (2003).

West Sussex Minerals Local Plan (2003)

7.3 A central objective to the West Sussex Local Plan is the principle of sustainable development and Policy 1 states;

POLICY 1: THE MINERAL PLANNING AUTHORITY IS COMMITTED TO THE PRINCIPLE OF SUSTAINABLE DEVELOPMENT. MINERAL WORKINGS WILL BE PERMITTED ONLY WHERE: -

(a) WORKING PRACTICES WHICH CAUSE LEAST ENVIRONMENTAL HARM WILL BE FOLLOWED; AND

(b) OPPORTUNITIES TO CONSERVE AND ENHANCE THE ENVIRONMENT ARE INCORPORATED IN PROPOSALS TO RECLAIM THE LAND TO A STANDARD APPROPRIATE TO THE AGREED AFTER USE.

7.4 The Local Plan accepts that minerals are a finite resource and can only be worked where they naturally occur. In this respect, "natural mineral resources should not be sterilised by development which could take place elsewhere" (paragraph 3.4). National, regional and local planning policy emphasise the value of the countryside and acknowledge the pressures being experienced in trying to balance conservation and development needs.

7.5 There is potential for large quantities of both oil and gas in West Sussex and the Local Plan states;

> **"The main sources for hydrocarbons in West Sussex are the faults and folds in the Corallion Beds and the lower Oolites of the Jurassic period which have created structures that have trapped oil and gas. These extend under the whole County"** (paragraph 2.46 and **Figure 5.1**, below).

Figure 5.1: Hydrocarbon Reserves in West Sussex

***Source**: West Sussex Minerals Local Plan, page 15*

7.6 The Local Plan states that "the underlying geology provides the foundation of the landscape of the County" and that "conflicts arise when minerals become of economic interest" (paragraph 4.1). West Sussex County Council considers that preference should be given for extraction outside of areas protected by statutory designation but accepts that Government policy allows "mineral extraction to take place in areas where other

development would not normally be permitted" (paragraph 4.7). The two reasons for this are that;

- "Minerals can only be worked where they are found; and
- Mineral extraction is a "temporary" activity and properly reclaimed sites should leave no unwelcome traces or undesirable impact" (paragraph 4.7).

7.7 The Local Plan seeks to ensure that proposals for mineral workings which may irreversibly damage statutorily designated sites are refused unless mitigation can remediate the environmental effects, or where the need outweighs the environmental objections to the designation (Policy 10 and Policy 11).

POLICY 10: PROPOSALS FOR MINERAL WORKING WHICH MAY IRREVERSIBLY DAMAGE STATUTORILY DESIGNATED SITES OF HISTORIC, ARCHITECTURAL, NATURAL OR SCIENTIFIC INTEREST WILL ONLY BE GRANTED IF THE DAMAGE CAN BE PREVENTED OR THE NEED FOR THE MINERAL OUTWEIGHS THE ENVIRONMENTAL OBJECTIONS RELATING TO THOSE DESIGNATIONS.

POLICY 11: WHERE NATIONALLY IMPORTANT ARCHAEOLOGICAL REMAINS, WHETHER SCHEDULED OR NOT, ARE AFFECTED BY PROPOSED MINERAL WORKING THERE WILL BE A PRESUMPTION IN FAVOUR OF THEIR PHYSICAL PRESERVATION IN SITU. WHERE SUCH REMAINS AND THEIR SETTINGS MIGHT BE ADVERSELY AFFECTED BY SITE RESTORATION WORK, OR BY OTHER DEVELOPMENT, THEN PROTECTION OF THE ARCHAEOLOGY AND THE INTEGRITY OF THE SITE WILL BE AFFORDED PRIORITY.

7.8 The highest standards of mitigation will be sought where mineral workings are located in Areas of Outstanding Natural Beauty (AONB) and will be subject to rigorous examination (Policy 12).

POLICY 12: SOME MINERAL WORKING MAY BE ACCOMMODATED WITHIN AREAS OF OUTSTANDING NATURAL BEAUTY, BUT MINERAL WORKINGS CONSIDERED LIKELY TO DAMAGE IRREVERSIBLY THE INTRINSIC QUALITIES OF THESE AREAS WILL BE REFUSED. THE HIGHEST STANDARDS WILL BE REQUIRED IN ALL MEASURES TO MITIGATE THE IMPACT OF WORKING AND TO PROMOTE RAPID RECLAMATION, UNLESS IT CAN BE DEMONSTRATED THAT RAPID RECLAMATION IS NOT PRACTICABLE. MINERAL APPLICATIONS WILL BE SUBJECT TO THE MOST RIGOROUS EXAMINATION WHICH WILL INCLUDE AN ASSESSMENT OF:

(a) THE NEED FOR THE DEVELOPMENT, IN TERMS OF NATIONAL CONSIDERATIONS OF MINERAL SUPPLY; AND THE IMPACT OF PERMITTING THE DEVELOPMENT, OR REFUSING IT, ON THE LOCAL ECONOMY;

(b) WHETHER ALTERNATIVE SUPPLIES CAN BE MADE AVAILABLE AT REASONABLE COST; AND THE SCOPE FOR MEETING THE NEED IN SOME OTHER WAY;

(c) ANY DETRIMENTAL EFFECT OF THE PROPOSALS ON THE ENVIRONMENT AND LANDSCAPE AND THE EXTENT TO WHICH THAT SHOULD BE MODERATED; AND

(d) IN THE CASE OF EXTENSIONS TO EXISTING WORKINGS, THE EXTENT TO WHICH THE PROPOSAL WOULD ACHIEVE AN ENHANCEMENT TO THE LOCAL LANDSCAPE.

7.9 Policy 16 states that appropriate measures are required for the safeguarding of the water environment during working, and advocates the prudent use of water resources.

POLICY 16: APPROPRIATE MEASURES WILL BE REQUIRED FOR SAFEGUARDING THE WATER ENVIRONMENT DURING WORKING AND THE PRUDENT USE AND RECYCLING OF WATER WITHIN MINERAL WORKINGS WILL BE ENCOURAGED.

7.10 The Local Plan acknowledges that mineral working can affect residential amenity and the built environment through for example, noise, dust and traffic impacts. Policy 19 states that:

POLICY 19: IN CONSIDERING PLANNING APPLICATIONS FOR MINERAL EXTRACTION ATTENTION WILL BE GIVEN TO THE EFFECT UPON RESIDENTIAL AND OTHER AMENITY, AND MEASURES TO MITIGATE THE IMPACT.

7.11 Mineral working sites must be reclaimed at the earliest opportunity and should be practicable and appropriate to the area. Policy 20 states;

POLICY 20: PLANNING PERMISSION FOR MINERAL EXTRACTION WILL ONLY BE GRANTED WHERE PROPOSALS FOR RECLAMATION WOULD BE PRACTICABLE AND APPROPRIATE FOR THE LOCATION, AND THAT RECLAMATION WOULD BE COMPLETED AT THE EARLIEST OPPORTUNITY.

7.12 Planning applications for mineral workings will only be approved where a comprehensive restoration programme including aftercare and after use, is agreed with the planning authority. **Policy 22** states;

POLICY 22: PLANNING APPLICATIONS FOR MINERAL WORKING WILL ONLY BE APPROVED WHERE THEY INCORPORATE EITHER DETAILED PROPOSALS FOR RECLAMATION, OR THE PRINCIPLES OF RECLAMATION REQUIRING THE SUBMISSION AND AGREEMENT OF MORE DETAILED PROGRAMMES AT A LATER DATE (OR DATES) TO BE AGREED WITH THE MINERAL PLANNING AUTHORITY. PROGRESSIVE RESTORATION WILL BE REQUIRED IN ACCORDANCE WITH PHASED WORKING SCHEMES, UNLESS IT CAN BE DEMONSTRATED THAT THIS IS NOT PRACTICABLE.

7.13 The Local Plan accepts that “exploration can normally be undertaken quickly and relatively unobtrusively” providing that a programme of reclamation is included as an integral part of the planning application submission (paragraph 5.9).

7.14 The location of hydrocarbon deposits is dependent upon seismic and other geological data which is most commonly carried out by the PEDL operator, and therefore the Local Plan does not allocate or identify hydrocarbon reserves or potential working areas.

7.15 The onus is therefore on the developer to provide evidence as to why a particular site has been chosen and its suitability. This is advocated by Policy 26 and supported by Policy 27 which state;

POLICY 26: APPLICATIONS FOR THE EXPLORATION, APPRAISAL AND/OR COMMERCIAL DEVELOPMENT OF OIL OR GAS RESOURCES WILL BE PERMITTED WHERE IT IS DEMONSTRATED TO THE SATISFACTION OF THE MINERAL PLANNING AUTHORITY THAT THE PROPOSAL PRESENTS THE BEST OPTION IN COMPARISON WITH OTHER ALTERNATIVE SITES WITHIN THE AREA OF SEARCH AND THAT THE PROPOSAL IS ACCEPTABLE IN RELATION TO THE SURROUNDING AREA. PARTICULAR ATTENTION WILL BE GIVEN TO

(A) THE IMPACT ON OTHER COUNTRYSIDE RESOURCES;
(B) THE SITE ACCESS AND THE ROUTEING OF HEAVY VEHICLES;
(C) THE MEANS OF PROTECTING NEARBY RESIDENTS AND AMENITIES FROM THE EFFECTS OF THE OPERATIONS;
(D) THE SAFEGUARDING OF PUBLIC RIGHTS OF WAY; AND
(E) THE SAFEGUARDING OF WATER SUPPLIES AND THE WATER ENVIRONMENT.

POLICY 27: PERMISSION FOR HYDROCARBON EXPLORATION WILL NORMALLY BE GRANTED SUBJECT TO COMPLIANCE WITH THE ISSUES ADDRESSED IN POLICY 26 HAVING REGARD TO THE LIMITED DURATION AND AREA OF THE ACTIVITY.

7.16 The Local Plan also stipulates planning policies for controlling mineral workings including transport, access, safety and environmental protection measures including wheel washing facilities. The number of vehicles and their routing to the Application Site must be taken into consideration including their distance from the Strategic or Local Lorry Route and impact on amenity. Policy 47 and 48 state;

POLICY 47: WHERE PLANNING APPLICATIONS FOR MINERAL DEVELOPMENT ARE CONSIDERED, ACCOUNT WILL BE TAKEN OF THE NUMBERS, TYPE AND ROUTEING OF VEHICLES LIKELY TO BE GENERATED. PERMISSION WILL REFUSED IF THE HIGHWAY NETWORK IS INADEQUATE AND ANY SIGNIFICANT HARM WHICH WOULD BE CAUSED BY THE INADEQUACY CANNOT BE OVERCOME. IN ADDITION, PERMISSION WILL BE REFUSED IF, IN ATTEMPTING TO OVERCOME ANY HIGHWAYS INADEQUACY, THE IMPROVEMENTS THEMSELVES WOULD CAUSE SIGNIFICANT HARM TO THE ENVIRONMENT.

POLICY 48: ACCESS TO MINERALS SITES FROM THE HIGHWAY WILL BE REQUIRED TO MEET SATISFACTORY STANDARDS AND WITHIN SITES SATISFACTORY PROVISION FOR VEHICLE TURNING, MANOEUVRING, LOADING AND WHERE APPROPRIATE WHEEL CLEANING FACILITIES WILL BE REQUIRED.

7.17 The Local Plan also advises Applicants that a working scheme and details of all plant and machinery will be required, with Policy 51 and 52 stating;

POLICY 51: APPLICANTS WILL BE REQUIRED TO INCLUDE IN PLANNING APPLICATIONS A SATISFACTORY WORKING SCHEME TO SHOW HOW WORKING WITHIN THE SITE IS INTENDED TO PROGRESS AND TO SHOW HOW RECLAMATION WILL FOLLOW CLOSE BEHIND EXCAVATION. UNWORKED AREAS WILL BE REQUIRED TO CONTINUE IN USE FOR FARMING OR BE MANAGED TO AN AGREED SPECIFICATION. APPROPRIATE ACCESS TO RECLAIMED AREAS WILL BE REQUIRED TO ENABLE AN APPROVED AFTERCARE SCHEME TO COMMENCE AT THE EARLIEST OPPORTUNITY.

POLICY 52: DETAILS WILL BE REQUIRED OF THE SITING AND APPEARANCE OF BUILDINGS, MACHINERY AND PLANT TOGETHER WITH PROPOSALS FOR THEIR REMOVAL WHEN NO LONGER REQUIRED IN CONNECTION WITH THE DEVELOPMENT.

7.18 Through Policy 53, the Local Plan seeks to ensure the incorporation of measures for the retention of existing vegetation and landscape features, with additional planting provided where necessary to screen proposals and support the longer term reclamation of the site.

POLICY 53:

(a) APPLICATIONS FOR MINERAL WORKINGS WILL BE REQUIRED TO INCORPORATE SATISFACTORY MEASURES FOR THE RETENTION, PROTECTION AND MAINTENANCE OF EXISTING TREES, HEDGEROWS AND SHRUBS WHERE APPROPRIATE.

(b) THE PROVISION OF SOIL BUNDS AND PLANTING WILL BE REQUIRED WHERE NECESSARY TO SCREEN WORKINGS AND TO CONTRIBUTE TO FINAL RECLAMATION SCHEMES.

7.19 The Local Plan advocates that Public Rights of Way (PROW) and their amenity should be safeguarded and promoted, with views from public areas across mineral workings taken into consideration along with proposals for landscaping and screening. Policy 55 supports this position, stating;

POLICY 55: PUBLIC RIGHTS OF WAY WILL BE SAFEGUARDED AND PROMOTED. THE AMENITY OF RIGHTS OF WAY, (PARTICULARLY VIEWS ACROSS WORKINGS) WILL BE TAKEN INTO ACCOUNT IN CONSIDERING PROPOSALS FOR LANDSCAPING AND SCREENING MINERAL SITES. WHERE STOPPING UP IS NECESSARY TO ENABLE EXTRACTION TO TAKE PLACE, STEPS WILL BE TAKEN WHERE PRACTICABLE TO SECURE THE PROVISION OF ALTERNATIVE PATHS AFFORDING CONNECTIONS TO OTHER HIGHWAYS IN SUCH A WAY AS TO MAINTAIN THE INTEGRITY OF THE RIGHTS OF WAY NETWORK AS A WHOLE AND TO PROVIDE ACCESS TO SUCH PARTS OF THE ORIGINAL PATHS AS DO NOT NEED TO BE STOPPED UP. ALTERNATIVE PATHS AND ANY NECESSARY DIVERSIONS OF EXISTING PATHS WILL BE REQUIRED TO BE IN PLACE IN GOOD TIME. WHERE APPROPRIATE, RECLAMATION PROPOSALS WILL BE SOUGHT TO INCREASE THE RIGHTS OF WAY NETWORK AND TO ENSURE THE REINSTATEMENT AT THE EARLIEST OPPORTUNITY OF THE ORIGINAL RIGHT OF WAY.

7.20 The Local Plan also seeks to promote measures to protect the quality of water supplies and ensure that mineral extraction would have no adverse impact on the water table. Policy 56 states:

POLICY 56: THE QUALITY OF SURFACE AND GROUND WATER SUPPLIES WILL BE PROTECTED AND STEPS WILL BE TAKEN TO ENSURE THAT PROPOSED MINERAL

EXTRACTION WILL HAVE NO ADVERSE EFFECT UPON THE WATER TABLE WHICH WOULD BE LIKELY TO CAUSE SIGNIFICANT ENVIRONMENTAL DAMAGE, FLOODING OR ADVERSELY AFFECT WATER RESOURCES.

7.21 Policy 58 seeks the appropriate handling and storage of soil as such that its quality is protected and so it can be reinstated when the site is restored.

POLICY 58: APPROPRIATE STRIPPING, HANDLING AND STORAGE OF SOILS PRIOR TO AND DURING MINERAL WORKING WILL BE REQUIRED IN ORDER TO PROTECT ITS QUALITY PENDING RE-SPREADING. SOILS REQUIRED FOR RESTORATION MUST BE RETAINED ON THE SITE.

7.22 Following on from Policy 56, Policy 59 advocates the imposition of suitable conditions to ensure the proper control of drainage and the efficient discharge of water from any mineral working sites;

POLICY 59: CONDITIONS WILL BE IMPOSED UPON PLANNING PERMISSIONS TO ENSURE THAT THE DRAINAGE AND DISCHARGE OF WATER IS EFFICIENTLY AND PROPERLY CONTROLLED WITHIN THE SITE.

7.23 Policy 60 advocates the imposition of Conditions to manage noise associated with proposed developments with appropriate monitoring points identified on site boundaries or at locations outside of the site;

POLICY 60: CONDITIONS WILL BE IMPOSED REQUIRING THAT ACCEPTABLE MAXIMUM LEVELS OF NOISE ARE NOT EXCEEDED AND APPROPRIATE MONITORING POINTS WILL BE IDENTIFIED ON SITE BOUNDARIES AND/OR AT APPROPRIATE LOCATIONS OUTSIDE THE SITE.

7.24 The Local Plan seeks to suppress dust levels from mineral workings and Policy 61 states the following;

POLICY 61: CONDITIONS WILL BE IMPOSED UPON PLANNING PERMISSIONS WHERE APPROPRIATE TO SUPPRESS DUST LEVELS BY SUCH MEANS AS SPRAYING WATER ON MATERIAL AT APPROPRIATE STAGES IN PROCESSING,

AND BY WATERING (OR BOWSING) AREAS REGULARLY USED BY VEHICLES, AND BY THE USE OF DUST EXTRACTORS.

7.25 Policy 62, 63 and 64 seek to utilise Conditions to protect local amenity including the impacts of lighting, hours of work and noise;

POLICY 62: CONDITIONS WILL BE IMPOSED ON PLANNING PERMISSIONS TO CONTROL THE ARTIFICIAL LIGHTING OF SITES IN THE INTERESTS OF LOCAL AMENITY.

POLICY 63: WHERE APPROPRIATE CONDITIONS CONTROLLING HOURS OF WORK WILL BE IMPOSED ON PLANNING PERMISSIONS INVOLVING MINERAL WORKING, PROCESSING AND ANCILLARY OPERATIONS, IN ORDER TO SAFEGUARD RESIDENTIAL AMENITIES.

POLICY 64: BUFFER ZONES TO REDUCE THE IMPACT OF OPERATIONS UPON THE NEIGHBOURHOOD MAY BE REQUIRED, PARTICULARLY IN RELATION TO RESIDENTIAL AREAS AND OTHER NOISE SENSITIVE USES.

Local Planning Policy

Chichester District Council Local Plan (1999)

7.26 The proposed exploratory well site falls within the District of Chichester. The Chichester District Council Core Strategy is currently under preparation and in the interim, the

saved polices of the Local Plan (1999) form the development plan documents for the District.

7.27 The saved Built Environment policies include those for the protection of the historic environment including **Policy BE3** which states;

> **"THE DESTRUCTION OF OR DAMAGE TO SCHEDULED ANCIENT MONUMENTS AND OTHER FEATURES AND SITES OF ARCHAEOLOGICAL INTEREST BY DEVELOPMENT WILL BE PREVENTED WHEREVER POSSIBLE. THERE IS A PRESUMPTION IN FAVOUR OF THE PRESERVATION IN SITU OF IMPORTANT MONUMENTS. WHERE PROPOSED DEVELOPMENT IS LIKELY TO AFFECT A KNOWN OR SUSPECTED SITE OF ARCHAEOLOGICAL INTEREST, ONE OR MORE OF THE FOLLOWING REQUIREMENTS WILL BE IMPOSED."**

7.28 The Local Plan advocates that new developments within the District should not detract from the existing character and surroundings. **Policy BE11** identifies the effects that will be considered in assessing any planning application for new development;

> **"NEW DEVELOPMENT WITHIN THE DISTRICT MUST NOT DETRACT FROM ITS SURROUNDINGS. IN ASSESSING PLANNING APPLICATIONS THE FOLLOWING MATTERS WILL BE TAKEN INTO ACCOUNT:**
>
> **(1) ITS EFFECT ON THE LOCAL ENVIRONMENT;**
> **(2) THE INTRINSIC MERIT OF THE DESIGN, SCALE, MATERIALS, SITING AND LAYOUT;**
> **(3) ITS RELATIONSHIP TO AND EFFECT ON NEIGHBOURING DEVELOPMENT;**
> **(4) ITS SETTING IN THE LANDSCAPE.**

TO ENSURE THAT ADEQUATE INFRASTRUCTURE, AND PROVISION FOR ITS FUTURE MAINTENANCE, IS OR WILL BE PROVIDED, PERMISSION MAY BE REFUSED OR PHASING REQUIREMENTS AND/OR CONTRIBUTIONS SECURED BY CONDITION OR AGREEMENT. PERMISSION WILL ALSO BE REFUSED IF THE PROPOSAL TAKES INSUFFICIENT MEASURES TO SUPPORT THE OBJECTIVES OF CRIME PREVENTION."

7.29 In support of this Policy, the protection of wildlife habitats, trees, hedges and other landscape features are advocated under **Policy BE14**, which states;

"PROPOSALS FOR NEW DEVELOPMENT WILL ONLY BE GRANTED PLANNING PERMISSION IF THEY INCLUDE:

(a) APPROPRIATE LANDSCAPING PROPOSALS WHICH INCLUDE THE USE OF NATIVE SPECIES UNLESS IT CAN BE SHOWN THAT THESE ARE INAPPROPRIATE TO THE SITE AND WHICH INDICATE THE REPLACEMENT OF HEALTHY TREES LOST AS A RESULT OF THE DEVELOPMENT;

(b) A DESIGN AND LAYOUT WHICH WILL MINIMISE THE IMPACT ON FEATURES AND SITES OF NATURE CONSERVATION OR OF GEOLOGICAL VALUE AND TAKE ADVANTAGE OF OPPORTUNITIES FOR HABITAT ENHANCEMENT AND CREATION. DEVELOPMENT WHICH WOULD HAVE AN ADVERSE EFFECT ON WILDLIFE SPECIES PROTECTED BY LAW WILL NOT BE GRANTED PERMISSION. PROPOSALS FOR DEVELOPMENT WHICH WILL AFFECT EXISTING TREES OR HEDGES OR WHICH WILL INVOLVE NEW PLANTING WILL BE REQUIRED TO INCLUDE:

(1) DETAILS TO BE SUBMITTED AT THE TIME OF INITIAL APPLICATION SHOWING THE POSITION OF EXISTING AND PROPOSED NEW TREES AND HEDGES IN RELATION TO BOTH THE SITE AS EXISTING AND TO THE DEVELOPMENT AS PROPOSED. SUCH DETAILS SHOULD ADDITIONALLY SHOW THE LOCATION OF PROPOSED SERVICE CABLES AND PIPES;

(2) MEASURES TO ADEQUATELY PROTECT EXISTING TREES AND HEDGES WHILST WORKS ARE BEING CARRIED OUT. THE DISTRICT PLANNING AUTHORITY MAY IMPOSE CONDITIONS ON ANY PERMISSION GIVEN TO ENSURE THAT ADEQUATE PROTECTION IS IMPLEMENTED BEFORE DEVELOPMENT COMMENCES. REQUIREMENTS (1) AND (2) MUST BE PREPARED IN ACCORDANCE WITH BS 5837: 1991 ("TREES IN RELATION TO CONSTRUCTION")."

7.30 The saved "Rural Environment" policies include **Policy RE7** which identifies the constraints associated with development in areas which have been designated as sites of nature conservation. The Policy states;

"THE DISTRICT PLANNING AUTHORITY WILL REFUSE PERMISSION FOR DEVELOPMENT WHICH WOULD BE LIKELY TO DAMAGE, DESTROY OR ADVERSELY AFFECT WETLANDS OF INTERNATIONAL IMPORTANCE (RAMSAR SITES), DECLARED OR POTENTIAL SPECIAL PROTECTION AREAS, CANDIDATE SPECIAL AREAS FOR CONSERVATION, SITES OF SPECIAL SCIENTIFIC INTEREST, AND NATURE RESERVES. WHERE PARTICULARLY SENSITIVE ECOLOGICAL SITES ARE THREATENED THE DISTRICT PLANNING AUTHORITY WILL TAKE ACTIVE STEPS TO PROTECT THEM AND MAY SEEK ARTICLE 4 DIRECTIONS."

7.31 Similarly, there are also Policies for non-designated areas which are still of nature conservation importance. This includes **Policy RE8** which states;

> **"THE DISTRICT PLANNING AUTHORITY WILL SEEK TO PROTECT FROM DEVELOPMENT OTHER AREAS, CORRIDORS OR OTHER FEATURES IMPORTANT TO NATURE CONSERVATION OR OF GEOLOGICAL SIGNIFICANCE, INCLUDING ANCIENT WOODLANDS AND SITES OF NATURE CONSERVATION IMPORTANCE, AND WILL REFUSE PERMISSION FOR DEVELOPMENT LIKELY TO DAMAGE, DESTROY OR ADVERSELY AFFECT THESE AREAS. IN APPROPRIATE CIRCUMSTANCES THE DISTRICT PLANNING AUTHORITY WILL SEEK MODIFICATIONS TO PROPOSALS, APPLY APPROPRIATE CONDITIONS OR REQUIRE LEGAL AGREEMENTS TO SECURE SUCH PROTECTION."**

7.32 Saved Transport policies include **Policy TR6** which seeks to ensure the continued safety of the highways network and states that;

> **"PLANNING PERMISSION WILL BE REFUSED FOR PROPOSALS WHICH WOULD ADVERSELY AFFECT HIGHWAY SAFETY INCLUDING IN RELATION TO ACCESS ARRANGEMENTS, INTERNAL ROAD DESIGN, CYCLE FACILITIES AND FOOTPATHS. PROPOSALS WILL ALSO BE REFUSED IF THEY RESULT IN THE GENERATION OF TRAFFIC, WHICH BY ITS AMOUNT OR TYPE, WOULD OVERLOAD THE HIGHWAY NETWORK."**

7.33 An appraisal of the Proposed Development and its accordance with the Development Plan is included in Section 10.0 of this Report.

8.0A SUSTAINABILITY APPRAISAL

A8. Section Alterations

A8.1 This Section of the Revised Planning Statement has been updated in respect of the following:

- **Minor amendments to project description and mitigation measures following the completion of the ES Addendum**

The Role of Planning in Achieving Sustainable Development

8.1 Sustainable development is often defined as "meeting the needs of the present without compromising the ability of future generations to meet their own needs", as cited in the report by the Brundtland Commission "Our Common Future" (1987). The Commission sought to raise awareness of environmental and developmental issues, and a commitment from all levels of society to take decisive action and formulate strategies to limit environmental degradation, sustain resources and promote economic development. The principle of sustainable development continues to rise on the political agenda from an international to a local level.

8.2 In the UK, Sustainability Appraisals are used to appraise planning policy documents to promote sustainable development, and are a compulsory requirement under the Planning and Compulsory Purchase Act (2004).

8.3 In 2005, the UK Government published a Sustainable Development Strategy "Securing the Future" which identified a long-term agenda for living within our environmental limits to ensure a fairer future for all. The Strategy identified the planning system as the framework to deliver sustainable development by balancing economic, social and environmental dimensions, and made a commitment to put sustainable development at the heart of new planning guidance.

8.4 In 2012, the National Planning Policy Framework (NPPF) was published by the Department for Communities and Local Government (DCLG) and placed "a presumption in favour of sustainable development" at the heart of the Framework in both plan-making and decision-taking (NPPF, page 4). This Section of the **Revised** Planning Statement carries out a Sustainability Appraisal of the Proposed Development with regard to national, regional and local guidance on sustainable development.

National Sustainability Appraisal

Securing the Future (2005)

8.5 The UK's national strategy on sustainable development is contained in the DCLG document "Securing the Future" (2005) and builds on the principles of previous national strategies on sustainable development from 1994 and 1999. The purpose of the strategy is "to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations" and "this will be done in ways that protect and enhance the physical and natural environment, and use resources and energy as efficiently as possible" (page 16).

8.6 The document sets out five guiding principles that will form the basis for policy in the UK and will promote the Governments goals of "living within environmental limits and a just society" by "means of a sustainable economy, good governance, and sound science" (page 17). Notwithstanding these guiding principles, the strategy also identifies four priority areas for immediate action across the UK which aims to align the UK's objectives and activities with international goals (**Appendix 8.1**). These priorities are;

- **Sustainable Consumption and Production** – building people's awareness of social and environmental concerns, reducing the inefficient use of resources and helping to boost business competitiveness;
- **Climate Change and Energy –** encourage a change in the way we generate and use energy;

- **Natural Resource Protection and Environmental Enhancement** – encourage a better understanding of environmental limits, enhancement and recovery; and
- **Sustainable Communities** – working to give communities more power and say, and embody sustainable development at a local level.

8.7 In **Table 8.1** (below) the Proposed Development is assessed for its sustainability in relation to the five guiding principles, and considers if the Proposed Development helps to meet any of the four priority areas identified above.

Table 8.1 – National Sustainability Appraisal

The Five Guiding Principles	Relationship to the Proposed Development	The Four Priority Areas			
		1.Sustainable Consumption & Production	*2.Climate Change & Energy*	*3.Natural Resource Protection & Environmental Enhancement*	*4.Sustainable Communities*
Living within environmental limits	1. Conclusions from the accompanying ~~environmental assessments~~ **ES and ES Addendum** show that there will be a minor beneficial impact on biodiversity and ecology through enhancement measures, should the Proposed Development be granted planning permission. Impacts on the landscape will be temporary, short term and reversible as such that the resulting impacts on the landscape will be negligible. Mitigation measures will ensure the environment is sustained and improved where opportunities exist through, for example, root protection measures, careful soil handling and a stringent programme of reclamation. Proposals for ecological enhancement, and educational and economic benefits combined with the negligible impacts break the link between economic growth and environmental degradation. 2. The Proposed Development respects the limits of the planet's environment, resources and biodiversity, and does not impair the use or enjoyment of the local environment. Fossil fuels produce less carbon dioxide emissions than coal and are therefore a cleaner energy source by comparison. 3. Should hydrocarbons be discovered in this location, the natural resources will not be over exploited because there are extensive opportunities for hydrocarbon exploration elsewhere in the UK as such that future access to resources will not be impaired for future generations. Oil and gas support our quality of life and their development will therefore not impair the availability of natural resources for life. 4. The Applicant has consulted with statutory and non-statutory consultees to establish the environmental limits of the Application Site and ensure the environment, biodiversity and resources are respected.	☑	☑	☑	☑
Ensuring a strong, healthy and just society	1. The Proposed Development helps to meet the diverse needs of people by contributing to a recognised national need for the development of our domestic energy reserves to improve our security of supply, and providing socio-economic benefits through employment, employee spending and corporate taxation. 2. The Applicant is expected to provide energy that contributes to the mix of fuel resources available regardless of whether it produces a higher level of carbon	☑	☑	☑	☑

	dioxide than renewable sources. Fossil fuels are a "cleaner" energy source compared to coal, and the use of modern equipment and mitigation measures limit the developments impact on climate change. 3. The Proposed Development would be in accordance with the integrated policy framework on oil and gas developments, and would conform to all legal and regulatory requirements and democratic processes which ensure just and local involvement. This will help to ensure the proposals stay within environmental limits and to ensure a decent environment for everyone. 4. The Proposed Development could help to create greater opportunities for all through the increased security and availability of fuel and other by-products including pharmaceuticals, plastics, cosmetics and construction materials. The use and increased accessibility to these products can help to promote health and wellbeing in society. The wider availability of these products promotes inclusion and equal opportunity for all.				
Achieving a sustainable economy	1. The Proposed Development offers short and long term benefits to the local, regional and national economy. This includes employment opportunities for skilled and unskilled workers, and the use of local businesses, materials and services. Corporate tax contributions from the Proposed Development would make a substantial contribution to supporting and stabilising the economy, and at a national level supporting environmental and social initiatives. 2. The proposals seek to contribute to the UK energy mix, and support the need for oil and gas during our transition to low carbon energy sources as we gradually change the way we generate energy. National policy makes clear that great weight should be given to the economic benefits of mineral extraction including oil and gas, and the development of our domestic reserves. 3. The proposals offer economic growth without environmental degradation as the effects of the development will be negligible or minor beneficial with enhancements being offered to improve the existing conditions. These will be funded by the developer rather than the taxpayer, thus encouraging investment and the use of local services. The existing environment is protected and maintained through careful siting, design and management including tree works, and root protection zones. 4. All works associated with the Proposed Development would be paid for by the Applicant and not the Government, therefore encouraging investment in the UK economy. The Proposed Development helps to sustain employment in a number of professions including those in construction, public administration, environmental and planning services, geology and engineering, as well as local	☑	☑	☑	☑

	businesses in landscaping, aggregates and other ancillary building services therefore supporting sustainable communities.				
Promoting good governance	1. A community consultation event was held prior to the completion and submission of the planning application which sought to engage with the local community, and inform residents about the proposals, results of the ~~environmental assessments~~ **ES and ES addendum**, and geology and drilling in West Sussex. 2. The ES **and ES Addendum** describes why we need oil and gas, how much we use and the limitations of renewable energy sources. It also details the national energy strategy which includes measures for increasing energy efficiency and promotes a reduction in energy use. 3. The Applicant's environmental team has consulted with the Planning Authority and other government organisations to promote effective participation in pre-application discussions, and to promote engagement between professionals in the same subjects as such that sustainable solutions and strategies can be debated and agreed to ensure resource protection and environmental enhancement. 4. Community engagement is on-going with a dedicated website, regular press releases, **one-to-one community surgeries** and the availability of contact details for the Applicant online and in community event documents, with the purpose of promoting effective participation to a diverse population and support sustainable communities.	☑	☑	☑	☑
Using sound science responsibly	1. The Proposed Development has been designed on the basis of strong scientific evidence in relation to geology, engineering, planning and environmental disciplines, and in accordance with adopted policies, guidance, professional experience and best practice examples. 2. The applicant has proposed mitigation methods for limiting the impacts of climate change in the Air Quality ~~assessment~~ **Chapter** including the use of modern equipment, turning off idle engines and managing dust and emissions through monitoring. 3. Scientific uncertainty has been taken into consideration with assessments being carried out on worst case scenarios, with methodology limitations being highlighted and mitigation measures recommended where appropriate. 4. Public concerns and ideas have been taken into consideration as a result of the community engagement events such as the proposed highway route.	☑	☑	☑	☑

8.8 The Proposed Development is shown to respect the five guiding principles of the UK's national strategy on sustainable development and responds to each of the four priority actions areas particularly living within environmental limits, promoting good governance and using sound science responsibly. The Proposed Development is therefore considered to be in accordance with the UK's national strategy on sustainable development.

National Planning Policy Framework (2012)

8.9 The purpose of the UK's national strategy on sustainable development is to align national, regional and local policies with EU initiatives on sustainability, and to promote the planning system as a tool for delivering these aspirations. This is reflected in the National Planning Policy Framework (NPPF) which was published in 2012.

8.10 Section 13 of the NPPF entitled "Facilitating the sustainable use of minerals" recognises that "minerals are essential to support sustainable economic growth and our quality of life" (para 142, page 32). As a consequence the NPPF recommends the provision of a sufficient supply of energy minerals to support the country's needs whilst ensuring that "there are no unacceptable adverse impacts on the natural and historic environment" (para 144, page 34). There are social, economic and environmental considerations which inform the sustainable use of minerals, and these have been considered in this **Revised** Planning Statement and the accompanying ES **and ES Addendum**.

Regional Sustainability Appraisal

Regional Spatial Strategy for the South East of England (2009)

8.11 In February 2013 the Local Government Secretary, Eric Pickles, announced that the Regional Spatial Strategy (RSS) for the South East of England would be revoked, with the aim of encouraging localised planning that would enable Councils to respond to the needs of the local area rather than Government targets. As the RSS including regional sustainability principles has been revoked, a regional sustainability appraisal of the Proposed Development will not be undertaken, in favour of a more localised appraisal.

Local Sustainability Appraisal

West Sussex County Council Minerals and Waste Core Strategy Draft Sustainability Appraisal (2007) and Scoping Report (2009)

8.12 In January 2007, West Sussex County Council (WSCC) published a Draft Sustainability Appraisal on the Minerals and Waste Core Strategy Development Plan Document which was followed by a Scoping Report in May 2009. These documents were prepared on the basis that the Minerals and Waste Local Plan would be a joint document. However, in May 2011 the Council decided to publish separate Mineral and Waste Local Plans in conjunction with the South Downs National Park Authority (SDNPA) for the area where the Park falls within the County boundary. Preparation of the Waste Local Plan has been prioritised over the Minerals Local Plan but the aforementioned documents will still be used to inform the development of the Plan, and are therefore used below to appraise the sustainability of the Proposed Development.

8.13 The following exercise in **Table 8.2** below, applies the Sustainability Appraisal "Objectives" and "Interpretation" from Table 5 of the 2007 Appraisal, and considers the "Decision-Making Criteria" from Table D1 of the 2009 Scoping Report.

Table 8.2 – Local Sustainability Appraisal: West Sussex County

Headline Objectives	Interpretation
A To protect and, where possible, enhance the amenity of residents and neighbouring land-uses	The Proposed Development has been sensitively located away from residential properties, businesses and densely populated areas to minimise noise, landscaping and visual impacts. Mitigation measures including wheel ~~washing~~ **cleaning** to supress dust and dirt on the highway, and essential 24 hour lighting will be inwards and downwards facing. Operations would be temporary, short term and reversible, and the ES **and ES Addendum** concludes that the Proposed Development would not have an adverse or long term impact on the local amenity or other land uses. Construction would take place during normal working hours and drilling would take place 24 hours a day to ensure safe and efficient drilling practice but would require minimal vehicle movements during this time and would be within acceptable noise thresholds.

B To protect and, where possible, enhance the health and well-being of the public	Safety is paramount to the Applicant for the health and well-being of the crew, and the public. Operators must apply to and obtain approval from the Health and Safety Executive and Department for Energy and Climate Change before drilling can take place, with health and safety procedures being adopted and adhered to throughout operations. The site and ditches would be constructed with an impermeable underlay to prevent contamination, and the borehole would be encased in cement to prevent seepage into the ground. Wheel ~~washing~~ **cleaning** facilities would prevent mud and stone being transferred onto the roads.
C To protect and, where possible, enhance the amenity of users of the PROW and users of the countryside	The Proposed Development is not located adjacent to or in the proximity of a PROW and therefore has no impact on the recreational use of the countryside. It would not be appropriate to provide additional recreational facilities in proximity to the Proposed Development which is a temporary and functional facility, and whilst there would be a temporary increase in traffic this will not have an adverse impact on the local PROW network due to the use of the existing main highway. The ES concludes at Chapter 13 Socio-Economics, that there will be no adverse effects on tourism.
D To reduce the risk of flooding and resulting detrimental impact on public well-being, the economy, and environment	The Application Site is located outside of a flood risk area and there are no major aquifers present and no local reliance on groundwater for water supplies. The risk of groundwater pollution is therefore inherently low and is reduced further by the incorporation of mitigation measures such as use of water-based, non-toxic drilling fluids which are industry standard.
E To provide an adequate supply of minerals and suitable waste facilities to meet social need and support economic growth.	The Government recognises the need for energy minerals and accepts that fossil fuels are likely to form a part of the UK's energy mix for the foreseeable future. Minerals are considered to be essential to our quality of life and in supporting sustainable economic growth. The Proposed Development would benefit the local and national economy through taxation, employment, the use of local services and materials, and through the provision of fuel and other products including plastics, pharmaceuticals and building materials which help to meet social need and support growth.
F To protect and where possible, enhance the vitality and viability of the local economy	The Proposed Development would support agricultural diversification and help to reduce dependency on a smaller number of economic activities. The Proposed Development would be beneficial to the local economy through the use of local services for example, aggregates, building supplies and landscaping services, and the direct and indirect employment of skilled and unskilled staff including construction workers, public administrators and specialist consultants.
G To protect and, where possible, enhance the vitality and viability of the local tourism industry	The Proposed Development is located on agricultural land away from PROW and will not have an impact on local tourism. It is not appropriate to encourage tourism activities in proximity to the Proposed Development which will be temporary in nature and will have a functional purpose.

H	To minimise transport of minerals and waste by road. Where road use is necessary, to minimise use of rural roads and maximise use of the Strategic Road Network and Advisory Lorry Routes	Minerals can only be worked from where they naturally occur and therefore there are limited opportunities to use rail or water for the transportation of construction materials or hydrocarbons. The Proposed Development is for exploration only and therefore there will be limited minerals to transport from the site, with water from the ditches and sump being recycled onsite to build the drilling mud where possible. The Proposed Development would minimise the use of rural roads as far as practicable by utilising Advisory Lorry Routes including the A272.
I	To protect and, where possible, enhance landscape and townscape character and quality	The Proposed Development has been carefully located outside of any sensitive environmental designations although it should be noted that the boundary to the South Downs National Park which encompasses a Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI), is located over 500m south of the Proposed Development. The Proposed Development has been located within an agricultural field which is bound on all but the western boundary by mature woodland. Views from Kirdford Road would be screened by hedgerows and trees, and soil bunds will also mitigate visual impact. As a worst case the rig will only be on site for ~~approximately 10~~ **up to 17** weeks **during drilling and testing of the vertical well, plus an additional** ~~or~~ 12 weeks if the horizontal is drilled, and therefore any visual impacts are short term and temporary.
J	To protect and, where possible, enhance the historic environment	The Proposed Development is not located in proximity to any Scheduled Monuments, conservation areas or listed buildings, and will therefore not have a detrimental impact on the historic environment. Archaeology was scoped out of the ES but an archaeological assessment has been submitted with the application which encourages protection of the ancient woodland, and the Archaeology Officer also recommended a programme of investigation, observation and recording during works.
K	To make the best use of previously-developed land (PDL) and reduce the need for greenfield sites	As previously noted, minerals can only be worked from where they naturally occur and therefore there are limited opportunities to locate mineral developments on PDL. The Proposed Development is temporary and following the cessation of works, the site would be restored to its original use and would revert to greenfield status. It will therefore not result in the industrialisation of the countryside or enable other less appropriate developments to come forward on the site.
L	To protect and, where possible, enhance biodiversity and geodiversity	The Proposed Development is not located within an area designated for its biodiversity or geodiversity although the purpose of the operations is to drill through areas of geological interest for the purposes of data acquisition on the substrata and to explore the potential for hydrocarbons. The Proposed Development would enhance our knowledge and understanding of the local geology and would not have an adverse impact on the geodiversity. There are sensitive designations approximately 500m south of the Proposed Development including the South Downs National Park which encompasses a SSSI and SAC which have been assessed by suitably qualified ecologists and landscape consultants, as part of the planning application with mitigation proposed where necessary. Any impacts are short term, temporary and reversible, and ecological enhancements measures have been proposed.

M To safeguard and use mineral resources wisely and encourage, where possible, the use of secondary materials	The Proposed Development would explore one of many potential hydrocarbon resources in the UK and will therefore not over exploit mineral resources, if indeed, hydrocarbons are found at all. Waste products from drilling include drilling mud and drilled rock cuttings which can be turned into a secondary material and recycled on site. The mud and cuttings would be taken to a commercial disposal site where, after treatment, they will be mixed with green waste and composted, and used as a soil improver for growing turf which is then used in commercial landscaping projects.
N To reduce the amount of waste, increase the re-use and recycling of materials and reduce the amount of waste going to landfill.	The Proposed Development would not affect rates of re-use and recycling in the County. It would not change people's behaviour or inhibit waste management practices. As discussed in (M) waste products would be treated and recycled, encouraging the sustainable use of secondary materials and reducing the amount of waste. Water from the ditches and sump would be used to build the drilling mud where possible.
O To reduce air pollution and to protect and, where possible, enhance air quality	The Proposed Development is temporary and short term, and therefore any impacts from traffic-derived emissions or operation are anticipated to be negligible. The use of drilling equipment with modern, efficient diesel engines will help to mitigate impacts on the local air quality.
P To minimise the use of the best and most versatile (BMV) land and protect and, where possible, enhance soil quality	The Proposed Development falls on agricultural land which is classified as Grade 3 and 4. The Proposed Development requires approximately 4 acres of land thus minimising the use of the BMV land. To protect soil quality, all top and sub soil excavated will be retained in separate bunds on site, and used to restore the land following the cessation of works.
Q To protect and, where possible, enhance water resources, water quality and the function of the water environment	The theoretical risk of deterioration of the casing and screen, thereby linking the hydrocarbons to the aquifers, will be mitigated by using best practice-industry standards as follows: • perforated casing sections will be plugged with cement, thereby preventing the escape of residual hydrocarbons; • the cement plugs and cement used in the casing will be placed in neutral pH environments, thereby minimising the risk of attack by acidisation; • where necessary, sulphate-resistant cement will be used; • the steel casings will be protected externally by the cement lining and internally by creation of a pH neutral environment and the development of anaerobic conditions.
R To mitigate the causes, and adapt to the effects, of climate change, including by reducing greenhouse gas emissions and promoting the use of renewable energy.	The Proposed Development would utilise modern and efficient drilling equipment to limit greenhouse gas emissions. The Applicant fully supports the development and growth of renewable energy sources but the Government acknowledges that fossil fuels will form a part of our energy mix for the foreseeable future. As a result, the Applicant has a responsibility to explore and produce from the Petroleum Exploration and Development Licence (PEDL) issued by the Department for Energy and Climate Change (DECC) to meet the country's need for oil and gas. In conjunction with renewable energy resources, energy minerals will help to sustain a secure energy mix in the UK.

8.14 **Table 8.2** concludes that the Proposed Development would be in accordance with the objectives and decision making criteria in the WSCC Minerals and Waste Core Strategy Draft Sustainability Appraisal (2007) and Scoping Report (2009).

Chichester District Council Sustainability Statement (2003)

8.15 Chichester District Council prepared a Sustainability Statement in 2003 to ensure contributions to sustainable development were being incorporated into decision and policy making across the authority. The Council formulated a series of four sustainable development objectives based on social, environmental and economic components to form the basis for the Sustainability Statement. The Proposed Development is considered in relation to these objectives in **Table 8.3** below.

Table 8.3 – Local Sustainability Appraisal: Chichester District

Objective	Sustainability Appraisal
1. Social progress that recognises the needs of everyone	The Proposed Development would help to meet the needs of the local and national population by providing a commodity which is essential to sustaining economic growth and quality of life. Ensuring security of supply helps to make fuel costs reasonable, and the Proposed Development would help to diversity the local economy and reduce dependency on a smaller number of economic activities. The Proposed Development will not have an adverse impact on the local amenity or people's health, and access to knowledge and information on the proposals was facilitated through the Applicant's community consultation exhibition and engagement programme.
2. Effective protection of the environment	The Proposed Development promotes effective protection of the environment because it is located outside of sensitive environmental designations, and is a short term, temporary proposal. Comprehensive and robust environmental assessments on a variety of environmental disciplines have been undertaken by suitably qualified consultants and conclude that where potential environmental impacts exist, these can be mitigated. The Proposed Development will respect natural diversity and pollution will be mitigated and designed out through design features and best practice.
3. Prudent use of natural resources	The Proposed Development will explore one of many potential hydrocarbon reserves in the UK, and will therefore not over exploit our natural resources.
4. Maintenance of high and stable levels of economic growth and employment	The Proposed Development would support agricultural diversification, and reduce dependency on a smaller number of economic activities in the locality. The Proposed Development would also utilise local services, materials and workers where opportunities exist, therefore supporting the local economy and encouraging growth.

8.16 The Proposed Development is shown to contribute to local objectives on sustainable development for Chichester District Council as illustrated by **Table 8.3**, particularly in relation to social progress and effective protection of the environment.

Conclusions

8.17 The Proposed Development is shown to be in accordance with the national strategy on sustainable development because it respects the five guiding principles on sustainability. The proposals also respond positively to the four priority action areas particularly living within environmental limits, promoting good governance and using sound science responsibly, and are therefore considered to align with international aspirations on sustainable development.

8.18 Objectives on sustainable development at a County and District level have formed the basis for a local Sustainability Appraisal of the Proposed Development. At a County level, the Proposed Development has shown to respect sustainable development objectives due to a number of factors. This includes the sensitive location of the Proposed Development, its temporary, short term and reversible nature, the ability for it to support and sustain the local economy whilst also meeting a local and national need, and with the conclusions of the numerous environmental assessments indicating negligible environmental impacts or mitigation measures where appropriate.

8.19 The proposals are shown to be in accordance with District level objectives on sustainable development particularly in relation to social progress and environmental protection. The sensitive location, design and assessment of the Proposed Development have shown that the proposals can meet sustainable development objectives locally whilst also meeting a national need and supporting the local economy.

8.20 The conclusions of the Sustainability Appraisal at a national and local level indicate that the proposal meets objectives on sustainable development and therefore aligns with international aspirations on sustainability. At a national, County and District level, the economic, social and environmental benefits of the Proposed Development are established. Notwithstanding the aforementioned strategies on sustainable

development, the NPPF acknowledges the vital importance of energy minerals in supporting sustainable economic growth and our quality of life. The Government identifies the planning system as the vehicle for delivering sustainable development and these proposals are shown to be in accordance with guidance in the NPPF and other policy documents as evidenced in Sections 9.0**A** and 10.0**A** of this Report.

9.0A ACCORDANCE WITH NATIONAL PLANNING POLICY

A9. Section Alterations

A9.1 This Section of the Revised Planning Statement has been updated in respect of the following:

- **Deletion of archived technical planning guidance to the NPPF**
- **The addition of recently published Planning Practice Guidance (2014)**

National Planning Policy Framework (2012)

Paragraph 14

9.1 The principle objective of the NPPF is a presumption in favour of sustainable development with proposals being granted permission without delay where they accord with the Development Plan. Or alternatively, where the Development Plan is absent, silent or out-of-date, granting planning permission unless adverse impacts would significantly or demonstrably outweigh the benefits when assessed against the NPPF, or specific NPPF policies indicate development should be restricted. Sustainable development is at the heart of the NPPF and is seen as a golden thread running through both plan and decision making.

9.2 A Sustainability Appraisal has been carried out in Section 8.0**A** of this Report and concludes that the Proposed Development is in accordance with the national strategy on sustainable development by respecting the five guiding principles and responding positively to the four action areas. The proposals are therefore aligned to international aspirations for sustainable development as well as being in accordance with County and District level sustainability objectives. The economic, social and environmental benefits of the Proposed Development are established through the ES **and ES Addendum** which

also concludes that there will be no significant adverse impacts on the environment as a result of the proposals.

9.3 The policies in the Development Plan are considered to be out of date, with the Chichester Local Plan having been adopted almost 15 years ago in 1999 and the West Sussex Minerals Local Plan being adopted 10 years ago in 2003. Both of these documents precede the publication of the Planning and Compulsory Purchase Act (2004) and the National Planning Policy Framework (NPPF) (2012). Under the Planning and Compulsory Purchase Act 2004, nine of the 64 policies of the Minerals Local Plan were not saved beyond 27 September 2007 including;

- Policy 23-24 New Mineral Workings;
- Policy 25 Reclamation; and
- Policy 28 Oil and Gas.

9.4 These policies are therefore absent from the West Sussex Minerals Local Plan. Overall, it is considered that the Development Plan policies are in general conformity with the NPPF with regards to environmental protection but it does not afford the same "great weight" given to the social and economic benefits of mineral extraction as in the NPPF.

9.5 The preliminary text to Chapter 4 Protecting the Countryside at paragraph 4.1 – 4.7 of the Minerals Local Plan emphasises the value of the countryside and the pressures being experienced, and in particular that "conflicts arise when minerals become of economic interest". Policies in the NPPF confirm the value of the countryside but also emphasise the importance of minerals as being essential to supporting sustainable economic growth and our quality of life.

Paragraph 115

9.6 The NPPF gives "great weight" to "conserving landscape and scenic beauty" with National Parks, the Broads and AONB's being given the "highest status" for protection. The NPPF also states that "the conservation of wildlife and cultural heritage are

important considerations in all these areas" and in National Parks and the Broads these should be given "great weight". The Proposed Development is not located within a National Park, the Broads or an AONB which are afforded the highest status of protection although the Applicant has incorporated measures to ensure protection of the landscape and scenic beauty at the Application Site and designations beyond its boundary. The conservation of wildlife and cultural heritage has also been an important consideration in preparing the planning application. In particular these issues are addressed in the accompanying ES **and ES Addendum** at Chapter 7**A** Ecology, Chapter 8**A** Landscape and Visual Impact and in the Archaeological Assessment.

9.7 Other than some short term temporary visual impacts during drilling operations, Chapter 8**A** Landscape and Visual Impact, concludes that the Proposed Development will not have a long term detrimental visual impact on PROW, the National Park or the wider countryside. There is no single direct view into the Application Site but there will be some views of the rig during operation but none following the removal of the drilling rig. These impacts will be temporary and the site will otherwise be screened by woodland and is not adjacent to a PROW.

9.8 The Proposed Development utilises an existing access and therefore does not require construction through a field boundary, the loss of trees or a large section of hedgerow. The location, design and mitigation measures proposed conserve the field boundaries and hedge lines, protect the ancient woodland and trees, and mitigate impacts on ecology. Any effects are short term and temporary with the existing screening, location of the Proposed Development, screening bunds, use of the least intrusive equipment possible for the task and the position of lighting, helping to preserve the scenic beauty of the local environment. Existing ambient lighting levels will be affected due to the functional, health and safety lighting of the rig and equipment but will only be used at night rather than when tourist attractions are open during the day. In respect of noise, based on the worst case scenario there will be some temporary increases in noise at the edge of PROW 768, 100m north of the Application Site but this will be within acceptable limits, temporary and negligible, and is not anticipated to be of detriment to visitors' enjoyment of the countryside.

9.9 Due the careful design of the Proposed Development, its small scale and temporary nature, no significant adverse effects are predicted. With the provision of enhancements, there will be a negligible impact on ecology as a result of the Proposed Development with some minor beneficial impacts being provided through the provision of bat boxes and their surveying. A comprehensive and robust series of ecological assessments for protected species has been undertaken as part of the Environmental Impact Assessment in consultation with WSCC and Natural England. The surveys have been undertaken in accordance with legislation and best practice guidance to ensure the protection of the surrounding designations and providing enhancements where appropriate. The Applicant has also undertaken a Habitat Regulations Assessment in consultation with Natural England and it has been concluded that there would be no detrimental impacts on bats.

9.10 Archaeology was scoped out of the ES but the Applicant has provided a freestanding desk based archaeology assessment in accordance with the Archaeology Officer's recommendation. A programme of observation and recording during ground works has been recommended. The Application Site is located away from listed buildings, and the ancient woodland to the north will be protected with a 15m buffer between the Proposed Development and the trees with no earth or works taking place on the root protection system of the trees. The Proposed Development is therefore in accordance with the provisions of paragraph 115 of the NPPF.

Paragraph 116

9.11 The Proposed Development does not fall within one of the designations referred to in paragraph 116 but it does in any case, have exceptional circumstances that are in the public interest which support the proposals further. Chapter 5**A** Need and Alternatives and Section 2.0 of this Report illustrate the national need for the Proposed Development in light of growing demand for oil and gas, decreasing domestic production, our increasing reliance on foreign energy imports, and ensuring security of supply. The impacts on the local economy are documented in Chapter 13 Socio-Economics of the ES including the impact of approval and refusal. The provision of direct employment for the

four Phases of development and indirect employment for local businesses and services will result in moderate to minor beneficial effects. If the application is refused the site will continue in agricultural production resulting in no local economic benefits from employee spending, use of local shops, businesses and services or local employment.

9.12 As evidenced in Chapter 5**A** Need and Alternatives of the ES **and ES Addendum** and earlier in this Report the Government's national energy strategy is to provide a mix of energy sources and to develop our own domestic reserves to ensure security if supply. The Government accepts that fossil fuels will form a part of our energy mix for the foreseeable future as we move towards low carbon sources. It is also accepted at a national and local level that minerals can only be mined from where they naturally occur and therefore provisions for developing elsewhere or meeting the need in some other way are not feasible. This is evidenced in the Alternative Sites Assessment and Chapter 5**A** Need and Alternatives.

9.13 Chapter 8**A** Landscape and Visual Impact and Chapter 13 Socio Economics conclude that there will be no **irreversible** detrimental impacts on the environment, landscape or recreational opportunities with the programme of mitigation measures provided **including restoration of the Application Site**.

Paragraph 118

9.14 The Proposed Development would not result in the significant harm and any potential impacts can be successfully mitigated through the measures proposed in the accompanying ES **and ES Addendum**. The Application Site is the most suitable site for the Proposed Development and was chosen following a thorough and robust Alternative Sites Assessment which accompanies the planning application. The~~re~~ Proposed Development is not within a SSSI and impacts on The Mens SSSI have been assessed as negligible in Chapter 7**A** Ecology. It is not practical to encourage biodiversity on the Application Site due to the functional and temporary nature of the proposal but the ~~Application~~ **Applicant** is proposing to **provide WSCC with 15 bat boxes and survey details to encourage and monitor biodiversity in the wider environment.** ~~install bat~~

~~enhancements following cessation of works to encourage biodiversity in the surrounding environment~~.

9.15 Measures for protecting trees and woodland including the ancient woodland have been incorporated into the design of the Proposed Development as a result of recommendations of the Arboricultural Impact Assessment (AIA). The AIA therefore shows the historic red line boundary on the drawings because the root protection zones were included as a direct result of this Assessment. The root protection zone includes a 15m buffer zone between trees and the Application Site to protect the root system of the trees, fencing to protect roots during construction and planting native species during restoration of the Application Site where necessary.

9.16 The Proposed Development incorporates measures for the protection of ~~the~~ The Mens SAC to the south of the Application Site which has been informed through consultation with WSCC and Natural England including the completion of a Habitat Regulations Assessment. The Applicants ecologists have also undertaken significant bat surveys including assessments for roosting bats and activity across the Application Site. The proposals also include measures for enhancement through the provision of 15 bat boxes **and residual effects are therefore either negligible or minor beneficial**.

Paragraph 142

9.17 The Proposed Development complies with paragraph 142 of the NPPF because as a mineral development it could provide minerals that encourage sustainable economic growth and provide the energy that the Country needs. Extensive seismic surveys have been undertaken to establish where the most technically suitable location to drill from would be because these minerals are a finite resource which can only be worked from where they naturally occur. **This is evidenced in Chapter 5A of the ES Need and Alternatives, and Section 2.0 of this Revised Planning Statement.**

Paragraph 144

9.18 The Proposed Development acknowledges the great weight that the benefits of the Proposed Development bring including to the economy, as illustrated in the accompanying ES at Chapter 13 Socio Economics **which concludes that residual effects are moderate/minor beneficial or negligible**. Chapter 14 Statement of Significance, of the ES concludes that there are no unacceptable adverse impacts on the natural and historic environment, or human health. The Proposed Development will not impact on aviation safety and the CAA advise that a vertical structure of around 40m will not be a hazard. There is only a legal obligation for structures of 150m+ to provide aviation safety lighting, and a flare at a height of 2-5m is not considered by the CAA to constitute a meaningful hazard to overflying aircraft.

9.19 The Proposed Development does not require any blasting operations. Measures to mitigate or remove unavoidable noise, dust and particle emissions at source and establish noise limits for operations in proximity to noise sensitive properties have been given significant consideration. As confirmed in Chapter 6**A** Construction Programme and Management of the accompanying ES **and ES Addendum**, wheel ~~washing~~ **cleaning** on site and road sweeping will be carried out to keep the local highway clear of mud, dust and debris, including the dampening down of stockpiles to avoid dust.

9.20 In respect of noise, based on the worst case scenario there may be some short term audible noise during construction and operation during daylight hours only. Measures to mitigate noise will be applied at source where possible including turning off engines when vehicles or equipment is not in use, reducing the drop height of materials and fixing rattling exhausts and applying silencers where possible. Quiet working methods would be adopted where feasible including the use of the most suitable plant and reasonable hours of working for noisy operations **and the residual effects are negligible**.

9.21 Air Quality was **originally** scoped out of the ES but a freestanding Air Quality Assessment ~~has been~~ **was** carried out and ~~accompanies~~ **accompanied** the **original** planning application submission including a series of mitigation measures. **The Applicant has**

since prepared an Air Quality Chapter to provide further details on air quality conditions, potential effects and mitigation which can be found in Chapter 15 of the accompanying ES Addendum, and concludes that residual effects are insignificant.

9.22 The cumulative impacts of the Proposed Development are considered in the technical Chapters of the ES.

9.23 In the terms of the Applicant's lease with the landowner, the Applicant has agreed that the site will be restored to its current agricultural use following the cessation of works, and that this will be carried out to the landowners' satisfaction. It is both practicable and appropriate to restore the site, and necessary to complete this at the earliest opportunity to enable the land to return to a productive use in association with the continued farming of the land. There are no exceptional circumstances which indicate that this should be underpinned with a bond or financial guarantee.

Paragraph 147

9.24 The Proposed Development involves exploration activities only and does not involve the use of hydraulic fracturing. The subsequent phases of an oil or gas development should not be used as a reason for refusal of an earlier stage. The Applicant has made a commitment not to use hydraulic fracturing on the Wisborough Green-1 well, and if exploration was successful but hydraulic fracturing would be needed to extract the hydrocarbons, a further planning application would be submitted for a new well to implement this.

9.25 This planning application seeks planning permission for exploratory drilling to establish if the stratigraphic trapping mechanism in the Great Oolite has occurred and if hydrocarbons have accumulated. Coring this rock formation in the vertical and contingent horizontal well during drilling and testing any hydrocarbons discovered, will gather enough information to enable a robust conclusion to be drawn on the potential for oil and gas extraction from this rock structure.

9.26 The drilling of the vertical and contingent horizontal well is classed as exploration drilling, and testing including Extended Well Testing (EWT) is governed by DECC which permits EWT in both exploration and appraisal wells.

~~**Technical Guidance to the National Planning Policy Framework (2012)**~~

~~Paragraph 20 and 21~~

~~9.27 In ensuring that proposals do not have an adverse effect on the natural or historic environment or human health the accompanying ES identifies the expected duration of operations in Chapter 4 Project Description, and Chapter 14 Statement of Significance illustrates that the Applicant has taken the potential impacts of the community into account. Chapter 5 Need and Alternatives illustrates how the proximity of mineral workings to occupied properties and legitimate operational considerations have been taken into account in locating, designing and planning for the Proposed Development.~~

~~Paragraph 23~~

~~9.28 The Proposed Development will not give rise to significant dust emissions. Standard industry measures such as wheel washing and dampening down of stockpiles will be employed to ensure compliance with appropriate environmental standards and suppress dust.~~

~~Paragraph 28-30~~

~~9.29 Chapter 9 Noise of the ES highlights the main characteristics of the processes and environs associated with the Proposed Development including the location of noise-sensitive properties and uses. The noise assessment predicted the likely future noise levels based on the worst case scenario and modelled these noise levels against the baseline conditions. The potential impacts have been identified in the Chapter which includes a series of mitigation measures to minimise, mitigate and remove emissions from the source. Whilst noise levels are shown to be within acceptable noise thresholds~~

~~as such that impacts will be negligible, noise monitoring can be undertaken to ensure compliance. It is worth reiterating that the noise levels have been established based on the worst case scenario and are considered to be less than those identified.~~

~~Planning practice guidance for onshore oil and gas (2013)~~

~~Paragraph 1-4~~

~~9.30 The Guidance makes clear that minerals are essential to the UK's prosperity and quality of life, and will remain an important part of life as we transition to low carbon energy supplies. The guidance is not intended to replace the need for judgement by minerals planning authorities or the applicant. The Applicant has taken the need and importance of minerals into consideration in preparing the application as evidenced earlier in this Report under Section 2.~~

~~Paragraph 6~~

~~9.31 The Applicant has considered the natural occurrence of minerals and the locational options for their development whilst minimising environmental impacts, into consideration in the Alternative Sites Assessment. The effects of the Proposed Development are considered in the ES and are largely negligible due to the temporary nature of the proposed works with mitigation being proposed where necessary, as evidenced in the accompanying technical Chapters 7-13 of the ES. The Applicant will restore the Application Site on cessation of works to a beneficial afteruse by returning the land to its former agricultural use.~~

~~Paragraph 11-12~~

~~9.32 The Applicant has gathered substantial information prior to applying for planning permission for exploratory drilling including geological and other relevant data, information from earlier drilling and information on aquifers and groundwater resources as supported by Chapter 11 Ground and Groundwater Protection, the Alternative Sites~~

~~Assessment and Section 2 of this Report. The Applicant therefore has a thorough understanding of the existing geological conditions.~~

~~Paragraph 29~~

~~9.33 The Applicant has included information on the permitting and regulatory regime that will be adhered to as part of the approval process which runs alongside and following the grant of planning permission (if applicable). Details on the permitting and regulatory regimes can be found in Chapter 6 Construction Programme and Management of the ES.~~

~~Paragraph 34-36~~

~~9.34 The Applicant has undertaken a thorough programme of community engagement and pre-application discussions with statutory and non-statutory consultees, local residents, Councillors and other interested parties. Details of pre-application discussions are contained in the Statement of Community Involvement (SCI) which accompanies the planning application, and in the relevant ES Chapters.~~

~~Paragraph 49~~

~~9.35 The Proposed Development is classed as exploration and involves drilling a vertical exploration well to explore for and test any hydrocarbons discovered using a short term test of up to 2 weeks. Dependent upon the results of this initial exercise, a horizontal well may then be drilled to explore the rock formation further. This would then require a short term test of around 2 weeks or it may involve a period of extended well testing (EWT) of up to 90 days which may be extended up 180 days although this would require the permission of DECC and the HSE. With regard to EWT DECC states that;~~

> ~~**"DECC may authorise extended periods of test production (extended well tests – EWT) from exploration or appraisal wells prior to development approval if it can be demonstrated the licensee will thereby gain technical understanding or confidence in**~~

~~**the performance of the field needed to progress towards a development".**~~

~~9.36 The Applicant may be able to conclude on the exploration activities by undertaking a short term test on the horizontal well and the carrying out of an EWT may not be required. The carrying out of an EWT on the horizontal well would help the Applicant gain a technical understanding and confidence in the performance of the field if the short term test could not conclude on this. This application covers as much of the exploration activity as possible and reduces the need for further planning permission at a later date. This reduces the impacts of drilling and testing the horizontal borehole twice (i.e. under two separate planning permissions – one for a short term test and one for an EWT), and encourages an efficient working programme.~~

~~Paragraph 61~~

~~9.37 As stated in Chapter 1 Introduction of the ES, the Application Site shows the above and below ground development. **Figure 1.1** shows the contingent horizontal deviation and the deviation tolerance zone whilst **Figure 1.2** shows the above ground infrastructure only. Except for Chapter 11 Ground and Groundwater Protection of the ES, the remaining technical Chapters consider the above ground infrastructure in their assessments.~~

~~Paragraph 65~~

~~9.38 Section 2 of this Report and Chapter 5 Need and Alternatives of the ES, clearly evidence the need for the Proposed Development in light of our depleting reserves, and the need to secure our energy supplies. Despite Government energy policy making it clear that energy supplies should come from a variety of sources, information on supply and demand has been provided by the Applicant to add context to the Proposed Development and the ES, and encourage understanding of the UK's energy industry.~~

~~9.39 The Government fully accepts and supports the development of our domestic oil and gas reserves and mineral planning authorities should not consider demand for alternatives to oil and gas resources when determining planning applications. Section 2.0 of this Report illustrates that whilst fossil fuels may produce more carbon dioxide emissions than renewable and nuclear energy sources, they produce almost half of the carbon emissions produced by coal.~~

Planning Practice Guidance (2014)

Minerals Overview

9.40 **An EIA was undertaken by the Applicant for the Proposed Development and a series of environmental assessments were scoped into or out of the ES by the Minerals Planning Authority. The Applicant will work with other regulatory bodies to ensure that control processes and health and safety issues that are subject to approval or permitting such as mining waste, surface water and groundwater, are obtained prior to works commencing.**

9.41 **Cumulative impacts have been considered in the technical chapters of the accompanying ES and ES Addendum – Chapters 7A to 12A, which do not highlight any cumulative effects. An effective, justified and reasonable separation distance from occupied residential properties has been highlighted in the Alternative Sites Assessment and appropriate mitigation measures applied in the technical chapters of the ES and ES Addendum where appropriate.**

Air Quality

9.42 **The key sources of emissions, which have been assessed are in the accompanying ES Addendum include:**

- **emissions from the construction of the Proposed Development;**
- **emissions from traffic associated with the Proposed Development;**
- **exhaust emissions from the on-site generators; and**
- **emissions from gas flaring.**

9.43 **Existing conditions within the study area show acceptable air quality. The impacts of the proposals have been assessed using standard methodologies, making a number of worst-case assumptions regarding on-site activities and emissions. It has been shown that emissions from traffic, and from the on-site generators and gas flaring would have an insignificant impact on local air quality.**

9.44 **An estimate of carbon dioxide emissions associated with the Proposed Development has been provided, with 433 te (as CO_2) associated with the vehicle movements and around 23,463 te associate with the use of the generators (as a worst case). These values may be compared with 835,100 te emitted from activities within the area covered by CDC in 2011 and 4,645,500 te emitted from West Sussex. There is no basis for judging the significance of the changes in emissions of carbon dioxide. Overall it is concluded that the air quality impacts of the proposals are insignificant.**

Biodiversity, ecosystems and green infrastructure

9.45 **Due the careful design of the Proposed Development, its small scale and temporary nature, no significant adverse effects are predicted. It is possible that some temporary, low level disturbance may be experienced by badgers using one sett. However, badgers are of Site value and so the effects are not significant.**

9.46 **Badger activity will be monitored on a monthly basis during the works so that the mitigation strategy can be updated to take into account any changes in activity.**

9.47 **To minimise the disturbance to badgers, the heavy goods vehicles used to deliver stone to construct the car park will only visit the site during daylight hours. All other heavy goods vehicle movements will be outside of the 30m buffer zone for the setts**

and so are not at risk of disturbing badgers. A detailed Construction Traffic Management Plan will be prepared to confirm the timings of all heavy goods vehicle movements.

9.48 **In line with current planning policy, enhancements will be made to benefit ecology. Fifteen bat boxes will provided to West Sussex County Council to be installed in the area. These will include at least five boxes designed to specifically support barbastelle bats. The bat boxes will be monitored for one year after installation to determine whether they are used by bats.**

9.49 **Bat activity will be monitored around the Application Site each month for the duration of the construction, operation and decommissioning phases of the development, where these fall within the bat active season. Surveys methods will be consistent with those detailed in Chapter 7A Ecology so that the activity of bats can be directly compared to the baseline survey data. All bat monitoring survey results will be issued to WSCC and the West Sussex Wildlife Trust.**

9.50 **A minor beneficial impact on bats is predicted as a result of the enhancement measures. The majority of residual effects are negligible therefore concluding that the Proposed Development is in compliance with the mitigation hierarchy of the NPPF and PPG.**

Groundwater

9.51 **The Proposed Development is to be drilled through a geological sequence that is well-defined and understood as detailed in Chapter 11A of the accompanying ES and ES Addendum. The inferred and recorded hydrogeological conditions accord with groundwater licensing records to indicate that that there are no major aquifers present and no local reliance on groundwater for water supplies.**

9.52 **The risk of groundwater pollution is therefore inherently low but is reduced further by the incorporation of mitigation measures such as use of water-based, non Hazardous**

drilling fluids when drilling through potential aquifers. This risk assessment applies to all aspects of the drilling, including the 26" diameter hole to 200ft depth, and in respect of the main phase of drilling, to both the vertical well and the lateral contingent. Well abandonment proposals will ensure no such risk exists in the long-term.

9.53 **The risk of local ground and surface water contamination will be removed by well-engineered site preparation, including the use of HDPE linings and the capture of all surface runoff via an interceptor ditch system.**

9.54 **Any additional permits and regulatory approvals required prior to the commencement of works will be sought at the appropriate time, and any relevant Conditions discharged.**

Lighting

9.55 **Light spill will be managed through good design, correct installation and maintenance combined with the positioning and use of lighting that is suitable for the purpose and does not exceed requirements, bearing in mind both safety and ecological impacts. The proposed measures include;**

- **Lighting on the rig will be inward and downward pointing and cowled in normal operation;**
- **The target lighting levels for the site to be set according to the relevant standards, Health and Safety and security requirements, but should be kept to a minimum to limit the effects of reflected upward light creating an aura above the site;**
- **If areas of the site are not used operationally throughout the night, the opportunity to dim fittings or switch some off should be taken, again subject to safety and security needs. Motion sensor lighting to be applied to the tungsten filament lighting to further mitigate the effects of the compound lighting.**

- **Lighting should be angled away, and where possible positioned away, from the woodland edges; and**
- **The power of the lights should be the minimum necessary for purpose.**

9.56 **Typical lighting levels surrounding the proposed well site range from 1 lux to 0.1lux at the immediate site boundary. Based on the lighting assessment in Chapter 12A of the accompanying ES and ES Addendum, the distance of the site from the woodland edge and the opaque screen on the fence mean that it is not unreasonable to conclude that the woodland would remain unaffected by artificial light installed within the Application Site.**

9.57 **It is also unlikely that the low level lighting will be visible from the woodland edge, due to the 3 metre bunds provided and the additional 4 metre high security fence with opaque covering between the Application Site and the woodland. Also with the units positioned both inward facing and pointing downwards, the amount of back spill will be minimal. As such the light emitted from the units would not be significant enough to spill from the site to the woodland itself.**

9.58 **Where tungsten halogen lamps are to be utilised, these luminaires shall be equipped with glass covers to afford greater UV filtration characteristics to detract insects and in turn foraging bats. In addition, tungsten lamps emit low levels of UV light which attracts insects and the foraging bats.**

9.59 **The lighting within the derrick is unlikely to be visible from the woodland, however this is intended to illuminate downwards and upwards only for short periods of time for essential maintenance. Although there will be an element of spill light through the lattice structure, this will be negligible due to the type of tungsten luminaires utilised. This lighting has been included within the lighting model and as such forms part of the overall site lighting assessment. The calculation software is unable to accurately model the derrick structure and as such will provide additional minor screening to mitigate any light spill.**

9.60 **Due to the sympathetic way in which lighting is applied to the Application Site in accordance with national policy, it is considered that any sky glow or aura resulting from the artificial lighting installations would be negligible. The highest mounted light fitting would be mounted above the *"dog house"* at approximately 6m above finished floor level. As described previously this in the general lighting conditions will be angled downwards.**

9.61 **It is considered that due to the relative distance from the site lighting to the boundary of the woods along with the sympathetic way in which the site is illuminated, that the resultant effects upon the woodland would be negligible.**

Noise Emissions

9.62 **Chapter 9A of the ES and ES Addendum – Noise, assesses the potential impacts of the Proposed Development and proposes mitigation where appropriate. The rig will not emit significant low frequency sound energy or noise of a tonal nature. The diesel exhaust systems are equipped with high-performance silencers which are designed to prevent the characteristic exhaust notes of large diesel engines emerging from the tailpipes. The high-frequency noises from drawworks brake squeal, which in the past were often a characteristic of a rotary drilling rig, have been eliminated on present-day rigs by the use of disc-brakes on the drawworks, and by the use of a top drive rather than a rotary drilling table to turn the drill string.**

9.63 **Deliveries and tanker visits to site would all be planned to occur in the daytime only. This would only change in an emergency, which might require large additional quantities of water. The telescopic handler would therefore normally be used during the daytime to offload deliveries. Use of this machine cannot be ruled out at other times, but this would only be occasional. The most frequent cause of complaint from mechanical handling machinery is 'bleeper' reverse warning alarms, and this can be mitigated by using 'white noise' audible warning signals instead.**

9.64 **As the predicted background noise levels at nearby residential properties are acceptably low, further noise mitigation measures are not expected to be required, but any decrease in noise level is regarded as beneficial and further noise control measures may be practicable. It will be necessary in any event to confirm that the noise control measures on the individual rig, including diesel exhaust silencers, attenuators allowing cooling air into and out of acoustically-enclosed machinery, and the enclosures themselves, are all kept in good repair in order to ensure that the overall sound power levels used for the acoustical modelling are valid.**

9.65 **When the rig is fully mobilised on site, access doors to all noisy equipment must be kept closed at all times. No detailed proposals are presented at this stage, but good site management practice will maintain acceptably low drilling rig noise throughout the life of the project.**

9.66 **Noise levels arising during site construction will sometimes be audible outside local noise-sensitive dwellings during the daytime only. This will not be a cause of noise nuisance and the amenity of residents will be unaffected provided that construction activities are limited to the normal working day and Saturday mornings.**

9.67 **The noise from 24-hour drilling operations will inevitably cause a temporary increase in ambient noise. The predicted noise levels at local dwellings are based on the noisiest rig likely to be used for the Proposed Development, and alternative rigs may be available for contract at the time. Specific noise control measures will be applied as necessary and appropriate.**

9.68 **Extended well testing is unlikely to be audible beyond the site boundary at any time.**

9.69 **Site restoration is similar to construction in terms of the noise emitted, but activity will be less intensive and mostly at lower levels.**

Transport

9.70 **A full transport assessment has been carried out in Chapter 10A of the ES and ES Addendum – Transport and Access which also includes a Road Safety Audit (Stage 1).**

9.71 **Construction traffic would access the Assessment Site via modifications to an existing field access for the duration of the works. The access meets appropriate highway standards with respect to layout and safety. Construction traffic would amount to less than 30% of total daily traffic volumes on the identified construction traffic access routes. No significant transport effects are therefore expected to arise as a consequence of traffic volumes.**

9.72 **There is the potential for minor adverse impacts to arise as a consequence of disturbance and the delivery of unconventional loads during construction. A Construction Traffic Management Plan would be prepared to mitigate this.**

9.73 **With mitigation measures in place, there are no residual effects identified in relation to Transport and Access during the temporary period of the Proposed Development**

Dust Emissions

9.74 **The earthworks will last less than 10 weeks and dust will arise mainly from the vehicles travelling over unpaved ground and from the handling of dusty materials. Any topsoil removed will be placed in a stockpile as close as possible to the point of excavation. In order to supress dust, procedures for dampening down stockpiles will be put in place. The dust emission class for the earthworks is considered to be small.**

9.75 **The construction will involve a small parking area using compacted stone on a geotextile membrane. The main site will be fenced off from the rest of the fields using a 2 m high wire mesh security fence. The access road will remain unfenced except where it passes to the south of a screen of trees, where a 1.2 m high post and wire fence will be erected on the north side of the track to maintain a 15 m clearance of the track from the trees. There will also be some portacabin accommodation for the workforce, which will not require construction. Dust will arise from vehicles travelling**

over unpaved ground, the handling and storage of dusty material. The construction will take place over a maximum of 10 weeks. The dust emission class for the construction is considered to be small.

9.76 **The number of vehicles during the Phase 1 construction, which may track out dust and dirt, is expected to be an average of 15 (maximum 25 per day leaving the site). The dust emission class for trackout is considered to be medium.**

9.77 **The dust assessment also concludes that the sensitivity of the area is low and combined with the small and medium scale dust emissions, there is judged to be an insignificant risk of dust effects during the construction period.**

Landscape Strategy

9.78 **Chapter 8A of the accompanying ES and ES Addendum – Landscape and Visual Impact, identifies the key landscape opportunities and the degrees of visual exposure to the Proposed Development.**

9.79 **Many of the landscape effects are temporary with the most adverse landscape effects, being the, most significant during the construction, and mobilisation and drilling phases, due to loss of the agricultural landscape affecting both land use and landscape character. The Proposed Development respects the existing field patterns rather having an adverse effect on these and the proposals also take care to respect the majority of the root protection zones of existing trees to the Application Site boundary and within the Application Site itself.**

9.80 **With the benefit of the well wooded surrounding landscape there is no single clear view into the Application Site. However the Proposed Development has adverse visual effects, these are most significant in close views from Kirdford Road during the mobilisation and drilling phase, due to the height of the rig, which cannot be mitigated. In the restoration of the Application Site to existing landscape conditions, all adverse effects are reversed, returning the Application Site to greenfield.**

9.81 **If retention of the Application Site is required following the finding of hydrocarbons, the removal of much of the operational structure and equipment from the Application Site reduces the adverse landscape and visual effects of the construction and operational phases.**

9.82 **If the Application Site achieves permission and goes into production, the long term aim will be to restore the Application Site to greenfield once production ceases, also mitigating the significant adverse landscape and visual effects of the production site.**

Restoration and Aftercare of mineral sites

9.83 **Chapter 4A of the accompanying ES and ES Addendum - Project Description, makes clear that the site will be restored in agreement with the Minerals Planning Authority via planning Condition. The impacts of restoring the Application Site have been assessed in Chapter 8A of the ES and ES Addendum – Landscape and Visual Impact, and mitigation measures proposed.**

Planning for Hydrocarbon Extraction

The Phases of onshore hydrocarbon extraction

9.84 **The Proposed Development is for the exploration of hydrocarbons including the drilling of a vertical well over a period of up to 14 weeks, and the potential drilling of a horizontal well from the vertical well, over a period of up to 12 weeks.**

The Planning Application Process

9.85 **Chapter 6 of the ES and ES Addendum – Construction Programme and Management, makes clear that the Applicant will obtain all necessary regulatory permits and control processes that fall outside of the remit of the Minerals Planning Authority and planning application process.**

Environmental Impact Assessment

9.86 **The Applicant bypassed the Screening process having assessed the sensitivity of the Application Site which is in proximity to a National Park and a Special Area of Conservation (SAC), and opted to submit a Scoping Report to the Minerals Planning Authority at their own discretion. The accompanying ES and ES Addendum addresses all the issues highlighted in the Scoping Report and has been written in accordance with EIA guidelines.**

Determining the Application

9.87 **The Revised Planning Statement and Chapter 5A of the ES and ES Addendum – Need and Alternative Sites, outline the Government's energy policy on the need for a variety of energy sources including oil and gas, and the importance of securing our energy supplies in respect of our social and economic environments.**

9.88 **The ES and ES Addendum concludes that there are no adverse or significant effects which cannot be suitably mitigated or controlled. Therefore should the Minerals Planning Authority be minded to grant planning permission these measures can be controlled through the use of appropriately worded Conditions.**

10.0A ACCORDANCE WITH THE DEVELOPMENT PLAN

A10. Section Alterations

A10.1 This Section of the Revised Planning Statement has been updated in respect of the following:

- **Minor amendments to project description and mitigation measures following the completion of the ES Addendum**
- **Amended paragraph numbering from 10.11 onwards which originally appeared as 9.9 - 9.58**

10.1 The following Section considers the Proposed Developments compliance with the adopted Development Plan which is outlined in Section 7.0 of this Report.

West Sussex Minerals Local Plan (2003)

Policy 1

10.2 The principle of sustainable development is a thread which runs through planning policy at a national, county and local level. To accord with Policy 1 of the Local Plan a number of working practices have been incorporated to limit environmental harm including;

- A Traffic Management Plan to minimise disturbance from construction traffic;
- Limiting working hours for noisy operations where feasible;
- Retaining topsoil and subsoil on site for reinstatement;
- Erecting fence at a distance of 15m from the field boundaries or individual trees to protect the root systems of the trees;
- Removed hedgerows would be replaced and protected by wooden post and rail fences with rabbit netting;

- Lighting would be angled away from the woodland and the minimum level necessary for the purpose **with an opaque screen fitted to the security fencing to limit light spill**;
- The site will be laid with an impermeable Bentomat geomembrane (or similar) to protect the soil from site liquids;
- Contents of the ditches and sump **(where applicable)** will be recycled or disposed of, and concrete would be broken up and taken off site for recycling.

10.3 These workings methods limit environmental damage and also facilitate the conservation and enhancement of the environment which will allow the site to be reclaimed to an appropriate standard after cessation of works. This includes reinstatement of native soils, management of the trees and protection of their root systems to conserve the existing landscape including replacement and maintenance of hedgerows, managing noise, traffic and lighting to limit impacts on the ecology, providing bat enhancements, and returning the site to agricultural use. A full Sustainability Appraisal has been carried out in Section 8.0**A** of this Report in further accordance with Policy 1.

Paragraph 4.1 - 4.7

10.4 The Local Plan accepts that Government policy allows "mineral extraction to take place in areas where other development would not normally be permitted". This is because minerals can only be mined from where they naturally occur and it is a "temporary" activity. The Local Plan expects mineral sites to be properly reclaimed so that they do not leave unwelcome traces or undesirable impacts.

10.5 On the cessation of works and reinstatement of the site, the land returns to a greenfield rather than a brownfield status because of the special circumstances afforded to mineral developments where other developments would not be permitted. Granting planning permission for a mineral development does not therefore set a precedent for further developments in the area, and will not result in the industrialisation of the countryside.

The finite nature of minerals means that all developments are classified as temporary because the field will eventually deplete, and the site will be restored.

Policy 10 and 11

10.6 The Proposed Development will not irreversibly damage any statutorily designated sites being located outside of any statutory designations which is a principle of the site selection process (where feasible) as illustrated in the accompanying Alternative Sites Assessment. There are no Scheduled Monuments within 1km of the Application Site and four Grade II listed buildings within 1km with Skiff Farmhouse, an 18th century or earlier building, being the nearest at circa 350m to the east on Kirdford Road. The South Downs National Park, and The Mens SSSI and SAC are all more than 500m south of the Application Site and there is a non-designated woodland buffer between the Application Site and Northup Copse which is designated ancient woodland and a SNCI.

10.7 Archaeology was scoped out of the ES with the Archaeology Officer agreeing that a desk based assessment, as proposed by the Applicant, would be appropriate and that observation and recording during ground works may be required. The Archaeology Assessment concludes with regards to the ancient woodland that care should be taken not to spoil the earthworks associated with this landscape feature. There will be a 15m buffer between the Application Site and any woodland, and soil will not be stored on or removed from the woodland. As a result of these measures and the distance and location of the Application Site from such designations, there will be no resulting damage and the Proposed Development is therefore considered to accord with Policy 10 and 11.

Policy 16

10.8 In respect of protecting the water environment, the Application Site is located outside of a flood risk area and there are no major aquifers present and no local reliance on groundwater for water supplies. The risk of groundwater pollution is therefore

inherently low and is reduced further by the incorporation of mitigation measures such as use of water-based, non-toxic drilling fluids which are industry standard.

10.9 Septic tanks would collect shower and wastewater from the contractors' compound to avoid runoff to the ground and water pollution. Liquids produced from the well would be stored in tanks contained within a bunded area with a perimeter bund to create sufficient storage capacity to equal 110% of one of the tanks as a precaution against leakage. Liquids collected in the ditches and sump would be recycled and used to build the drilling mud, or taken off site to a registered facility for disposal. The Proposed Development is therefore considered to be in accordance with Policy 56.

10.10 Prior to abandonment the well will be fitted with cement plugs to prevent fluid movement between horizons. The theoretical risk of deterioration of the casing and screen, thereby linking the hydrocarbons to the aquifers, will be mitigated by using best practice-industry standards as follows:

- perforated casing sections in the production zones will be plugged with cement, thereby preventing the escape of residual hydrocarbons left in the reservoir (noting that, by that time, production will have removed most of the hydrocarbons present);
- the cement plugs and cement used in the casing will be placed in neutral pH environments, thereby minimising the risk of attack by acidisation;
- where necessary, sulphate-resistant cement will be used to minimise the risk of sulphate attack; and
- the steel casings will be protected:
    - externally by the cement lining; and
    - internally by creation of a pH neutral environment and the development of anaerobic conditions.

10.11 The Proposed Development therefore includes considerable measures for the protection of the water environment both above and subsurface, and is therefore deemed to be in accordance with Policy 16.

Policy 19

10.12 Considerable attention has been given to protecting residential and other amenity as detailed in the accompanying ES **and ES Addendum** including construction programme and management (Chapter 6**A**), visual impact (Chapter 7**A**), noise (Chapter 9**A**), transport and access (Chapter 10**A**) and lighting (Chapter 12**A**), and the Alternative Sites Assessment.

10.13 There will be some views of the rig during operation although lower and middle parts of the rig and site will be mostly screened from view of properties by woodland and topography. The Application Site will not be visible from the nearest tourist attraction as concluded by viewpoint 40 on **Figure 8.6** in Chapter 8**A** – Landscape and Visual Impact. Other than some short term temporary visual impacts during drilling operations, the Proposed Development will not have a long term detrimental visual impact on PROW, the National Park or the wider countryside.

10.14 In respect of noise, based on the worst case scenario there may be some short term audible noise during construction and operation during daylight hours only. Measures to mitigate noise will be applied at source where possible including turning off engines when vehicles or equipment is not in use, reducing the drop height of materials and fixing rattling exhausts and applying silencers where possible. Quiet working methods would be adopted where feasible including the use of the most suitable plant and reasonable hours of working for noisy operations. In respect of noise, based on the worst case scenario there will be some temporary increases in noise at the edge of PROW 768, 100m north of the Application Site but this will be within acceptable limits, temporary and negligible, and is not anticipated to be of detriment to visitors' enjoyment of the countryside.

10.15 There will be an increase in traffic movements mostly during construction resulting in minor effects from disturbance and delivery of unconventional loads although this will be managed through a TMP. Existing ambient lighting levels will be affected due to the functional, and health and safety lighting of the rig and equipment. Lighting will be

positioned inwards and downwards facing using the lowest level of lighting required to fulfil its function, and will be pointed away from the woodland edge. This will also help to protect the amenity of the local landscape in respect of ecology and tourism. The Proposed Development is considered to protect residential and other amenity in accordance with Policy 19.

Policy 20 and 22

10.16 The Applicant has a legal agreement with the landowner, that the site will be restored to its current agricultural use following the cessation of works, and that this will be carried out to the landowners' satisfaction. It is both practicable and appropriate to restore the site, and necessary to complete this at the earliest opportunity to enable the land to return to a productive use in association with the continued farming of the land. It would not be appropriate to restore the site to any other use because it does not benefit from public access and the field forms part of a wider agricultural use. A programme for restoring the Application Site has been included in the planning application and includes;

- Plugging and abandoning the well in accordance with industry practice by setting cement plugs in the wellbore to provide isolation;
- cutting the steel casing approximately at least 2m below the surface and capping the well with a steel plate;
- Rigging down and demobilisation of the drilling rig;
- All structures including welfare and support buildings, the drilling rig and storage tanks would be removed;
- Any remaining drilling mud and cuttings waste would be removed from the site along with the perimeter ditch-lining and disposed of at an approved disposal facility;
- the well cellar and all stone is removed;
- the soil which has been stored in the on-site bunds, is replaced;
- Post and wire fences would be erected to protect the freshly worked soils from livestock if required;

- Stored subsoil and top soil would be loosely spread over the re-graded ground to relieve compaction;
- the Application Site would be re-contoured and allowed to regenerate naturally without the use of grass seed or planting and possibly replanted with trees in the future.

10.17 The proposed reinstatement programme would be agreed with West Sussex County Council in writing prior to commencement of the work. The Proposed Development is therefore in accordance with Policy 20 and 22.

Policy 26 and 27

10.18 A number of technical assessments have been undertaken as part of this planning application and give regard to the considerations listed in Policy 26. As part of the ES and in accordance with Policy 26 an Alternative Sites Assessment has been undertaken and accompanies this planning application submission. The purpose of the Alternative Sites Assessment is to identify sites which offered the potential for the development of an exploratory well site, within the Search Area identified by the Applicant. The assessment involved a desk-based review of the environmental and planning constraints followed by a number of site visits.

10.19 The Alternative Sites Assessment concluded that the Application Site is the most suitable location for a well site development in the search area. It is a well screened location which benefits from the use of an existing agricultural access and track that does not require the felling of any trees to accommodate the development, retains field boundaries and is in proximity to the A272 - a main vehicular route. The site does not fall within a flood risk zone.

10.20 The Application Site is considered a sufficient distance from residential properties as such that noise impacts will be mitigated. It falls within the primary search area and is outside of the South Downs National Park. It does not directly affect any environmental designations as it is located on agricultural land and will also support farm

diversification. The site does not impact on the local cultural heritage being located away from Scheduled Monuments and not directly adjacent to listed buildings. There is an area of non-designated woodland between the site and the designated ancient woodland as such that it is not immediately adjacent. The Application Site, which would be the subject of a full Environmental Impact Assessment, is considered to be the most suitable site for taking the development forward and fulfilling the Conditions of PEDL 234. The Proposed Development is therefore in accordance with Policy 26 and 27.

Policy 46 and 47

10.21 The Assessment Site is currently directly accessed from Kirdford Road which is a single carriageway road that connects Wisborough Green/A272 to the south with Kirdford to the west. The route continues westwards after Kirdford to connect with Petworth. Kirdford Road in the vicinity of the Assessment Site is rural in nature being derestricted and unlit. It is generally between 4m and 6m wide and WSCC have confirmed that there are no weight restrictions on Kirdford Road including at Boxal Bridge. The A272 is part of the Advisory Lorry Route for West Sussex County Council, and the Proposed Development utilises this route as far as practicable.

10.22 Within Wisborough Green, there are a number of side roads accessed from Kirdford Road together with residential frontage and driveway accesses. The speed restriction is 30mph with limited street lighting. As Kirdford Road enters Wisborough Green it skirts the north of a cricket ground. At this point footways are provided which, when combined with footpaths within Wisborough Green, provide continuous segregated facilities for pedestrians throughout the majority of Wisborough Green.

10.23 Construction traffic would access the Assessment Site via modifications to an existing field access for the duration of the works. The access meets appropriate highway standards with respect to layout and safety and wheel ~~washing~~ **cleaning** facilities would be provided to suppress dust and ensure dirt is not taken onto the highway from the Proposed Development. Construction traffic would amount to less than 30% of total

daily traffic volumes on the identified construction traffic access routes. No significant transport effects are therefore expected to arise as a consequence of traffic volumes.

10.24 There is the potential for minor adverse impacts to arise as a consequence of disturbance and the delivery of unconventional loads during construction. A Traffic Management Plan (TMP) would be prepared to mitigate this. With mitigation measures in place, there are no residual effects identified in relation to Transport and Access during the temporary period of the Proposed Development.

Policy 51 and 52

10.25 In accordance with Policy 51 and 52 a description of the Proposed Development is included in Section 4.0**A** of this Report. A more detailed description is provided in Chapter 4**A** Project Description and Chapter 6**A** Construction Programme and Management. The planning application drawings also provide a step by step illustration of the different phases and the **likely** equipment required at each stage **whilst the parameter drawings indicate the "worst case" scenario which is tested in the ES and ES Addendum. A rig would not be contracted until planning permission were granted and a rig that was suitable became available for contracting. Therefore the layout and rig specification would be controlled by Condition and agreed with WSCC prior to works being carried out.** ~~These~~ **The planning** documents detail the works and timescales involved with the construction and operation of the proposed well site from construction to restoration.

10.26 The planning application also includes plans detailing the appearance of buildings, machinery and plant during the different phases which will be removed following the cessation of works, as detailed above in accordance with Policy 20 and 22.

Policy 53

10.27 An Arboricultural Impact Assessment has been undertaken as part of the planning application and requires some remedial works to three trees (T1, T2 and T8) but no trees

will need to be felled as part of the Proposed Development. A small section of shrub adjacent to the entrance will need to be removed to accommodate the HGV turning circle but this will be replaced with a native whip following cessation of the works and protected using fencing.

10.28 There is a 15m buffer zone between the Application Site and the woodland edge to ensure the protection of the root system of the trees so that they can be maintained and protected for the long term benefit of the landscape and ecology.

10.29 Soil will be retained on site and stored in separate top and sub soil bunds which can be used to reinstate the site on cessation of works. This will support the appropriate restoration of the Application Site and will help to screen the lower elements of the Proposed Development including site cabins, cars and other low level equipment. The Proposed Development is therefore in accordance with Policy 53.

Policy 55

10.30 In accordance with Policy 55, the proposals will not have a direct impact on any Public Rights of Way. The Application Site is not open to public access but there is a network of public rights of way (PROW) to the west, north and east of the Application Site. To the south there is a large area without public rights of way between the Application Site and a 2km radius, but there are public rights of way beyond this.

10.31 The closest PROWs to the Application Site are as follows. A footpath *(PROW ref. 768)* lies at approx. 100m to the north, and runs in a westerly direction, from its junction with Kirdford Road towards Kirdford. A second PROW, a bridleway *(PROW ref. 2851/1)* is 625m to the west, and runs west for 125m and then turns to run northwards. A third PROW lies at approx. 625m from the Application Site and runs between Kirdford Road and a small lane off the A272 on the western edge of Wisborough Green.

10.32 The sensitivity of the access and public right of way in relation to the Application Site is assessed as of low importance as there are none directly running through or adjacent to

the Application Site. The impact of the proposals on the views experienced from PROWs in the surrounding countryside has been assessed as part of the supporting landscape and visual impact assessment. In view of the existing level of screening and its temporary nature it is anticipated the Proposed Development will not have an adverse impact on existing PROWs.

10.33 In respect of noise, based on the worst case scenario there will be some temporary increases in noise at the edge of PROW 768, 100m north of the Application Site but this will be within acceptable limits, temporary and negligible, and is not anticipated to be of detriment to visitors' enjoyment of the countryside.

Policy 56

10.34 Flood Risk was "scoped out" of the ES as pre-application discussions with WSCC and the Environment Agency (EA) indicated that that there was no flood risk in the area, and that the Proposed Development would not create a flood risk.

10.35 The Application Site falls on land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding in any year (<0.1%). The Application Site lies approximately 100m south of the Boxal Brook and outside the resulting 1 in 100 year (1% annual exceedance probability) flood extent.

10.36 The risk of local ground and surface water contamination will be removed by well-engineered site preparation, including the use of an impermeable Bentomat geotextile lining or similar, and the capture of all surface runoff via an interceptor ditch system. There are no watercourses adjacent to the Application Site and any ditches around the perimeter would be cleaned as necessary.

Policy 58

10.37 Soil will be stripped, handled and stored appropriately to ensure it can be reinstated on the site following cessation of works. The top and subsoil will be stored in separate

bunds on site and outside the root protection areas of the adjacent woodland. There will be a 15m buffer between the Application Site and any woodland, and soil will not be stored on or removed from the woodland. The site will be laid with an impermeable Bentomat geomembrane (or similar) to protect the soil from site liquids. During restoration of the Application Site, stored subsoil and top soil would be loosely spread over the re-graded ground to relieve compaction. Post and wire fences would be erected to protect the freshly worked soils from livestock if required. These measures are in accordance with the provisions of Policy 58.

Policy 59

10.38 The following measures have been incorporated into the site design to ensure the drainage and discharge of water is efficiently and properly managed to protect the local water environment;

- the access road will consist of a tarmac **and stone** entrance with drainage where required;
- any land drains that were disturbed would be reinstated or a new system installed by agreement with the landowner.
- The internal well site surface will be formed with crushed stone compacted on top of a geotextile layer and to a normal fall to a perimeter interceptor ditch;
- Interceptor ditches will be lined with a Bentomat geomembrane falling to a corner sump area;
- The contents of the surface water collection ditch and compound sump would be emptied as necessary and used to build the drilling mud or transported by road tanker for disposal at an approved location;
- The ditches and “sump” area are designed to retain storm water during the 1 in 10 year event due to the limited lifespan of the development;
- In addition, the storage provision allows for there being a “blow-out” on the site and this storage exceeds the 1 in 100 year storm. If there was a 1 in 100 year

storm the storage is such that the site would be approximately 25mm under water.

10.39 The proposed development will also be regulated by the Environmental Agency (EA) as required by the Environmental Permitting Regulations (England and Wales) Regulations 2010 (EPR 2010). This will include a Mining Waste permit which will be supported by the information on ground and groundwater protection, waste management planning and air quality. The Proposed Development is and will therefore be in accordance with Policy 59.

Policy 60

10.40 Noise from on-site construction and drilling works were assessed against fixed noise limits of 65dB (daytime), 55dB (evening and weekend) and 45dB (night). The noise levels were based on the "worst case" scenario i.e. using the noisiest rig and generator. Due to the large separation distance between the Application Site and the closest noise sensitive premises combined with the orientation of the drilling rig, the predicted noise levels from on-site operations were below the proposed noise limits for all phases of the Proposed Development, thus a negligible effect is expected. The Proposed Development is therefore in accordance with Policy 60.

Policy 61

10.41 In accordance with regular well site practice, the Site will be constructed and operated in accordance with standard industry measures to suppress dust levels including the use of wheel ~~washing~~ **cleaning** facilities.

Policy 62

10.42 Policy 62 seeks to impose Conditions that will enable control of artificial lighting for the purposes of protecting local amenity. Lighting of the rig is required 24 hours a day during the drilling process for health and safety reasons and this cannot be avoided. Chapter

12**A** Lighting, in the accompanying ES **and ES Addendum** proposes the following mitigation measures to protect local amenity for residents and ecology;

- Lighting on the rig will be inward and downward pointing **and cowled in normal operation**;
- The target lighting levels for the site to be set according to the relevant standards, Health and Safety and security requirements, but should be kept to a minimum to limit the effects of reflected upward light creating an aura above the site;
- If areas of the site are not used operationally throughout the night, the opportunity to dim fittings or switch some off should be taken, again subject to safety and security needs.
- Lighting should be angled away, and where possible positioned away, from the woodland edges; and
- The power of the lights should be the minimum necessary for purpose.

10.43 With these measures it is considered that the rig can be operated safely and amenity will be protected as such that the Proposed Development complies with Policy 62.

Policy 63

10.44 The adoption of daytime working hours (to be agreed with the Planning Authority) during Phase 1 Construction and Phase 4 Restoration or Retention, would avoid disruption to the local amenity at night, although the noise assessment results indicating that on a worst case scenario the Proposed Development would still be within acceptable noise limits. It would be usual practice to allow potentially noisy activities only during the normal working week and on Saturday mornings with no working on Sundays. Drilling must take place 24 hours a day to enable the safe and efficient operation of the drilling activities. The working hours for this Phase cannot be Conditioned differently as it would impact the timescales for completing the Proposed Development, and the safe operation of the site. The Proposed Development will therefore be in compliance with Policy 63 where feasible.

Policy 64

10.45 There is no adopted methodology for identifying suitable onshore oil and gas well sites, and there is no legal statute or planning policy which advocates how sites should be identified. As evidenced in the accompanying Alternative Sites Assessment, the Applicant has a robust methodology for identifying sites. This includes setting a buffer with a 400m radius around residential properties to ensure that there is no detriment to the amenity of residential uses. Other noise sensitive uses such as PROW, are reviewed following the identification of potential well sites with the potential impacts considered and advice sought from specialists where necessary before choosing a site. The Alternative Sites Assessment Methodology illustrates that the protection of amenity is a consideration from the outset. Based on the above Proposed Development is in accordance with Policy 64.

Local Planning Policy

Chichester District Council Local Plan (1999)

Policy BE3

10.46 The Proposed Development will not cause destruction or damage to a Scheduled Monument or other features of archaeological interest. Archaeology was scoped out of the ES but the Applicant has provided a freestanding desk based archaeology assessment in accordance with the Archaeology Officer's recommendation. A programme of observation and recording during ground works has been recommended. The Application Site is located away from listed buildings, and the ancient woodland to the north will be protected with a 15m buffer between the Proposed Development and the trees with no earth or works taking place on the root protection system of the trees. The Proposed Development therefore accords with Policy BE3 of the Local Plan.

Policy BE11

10.47 The Proposed Development has a functional purpose and is a temporary development as such that the design and siting of the proposals can only be altered in a limited number of ways. The Application Site has been chosen because it is located away from residential properties, outside of the National Park and any other designations and using the existing landscape to help screen the development from near and distant views. There are existing vertical structures with a height of around 50m in the field and these are a greater height than the Proposed Development. The scale of the drilling rig is sufficient for fulfilling the task although the use of a 65m high rig was considered but discounted to help mitigate visual impacts. The accompanying ES **and ES Addendum** has concluded that there are no long term adverse impacts as a result of the Proposed Development and the effect on the local environment can be mitigated where necessary. Security gates and fencing have been included to support the objectives of crime prevention during all Phases, combined with the 24 hour presence of staff during operations and fencing of the cellar during Phase 4b Retention. The Proposed Development conforms to the requirements of Policy BE11.

Policy BE14

10.48 No trees will be lost as a result of the Proposed Development and maintenance and remedial works will be undertaken to three trees (T1, T2 and T8). A 15m buffer between the adjacent woodland and Application Site will ensure that the root protection system will not be damaged during the Proposed Development.

10.49 There is a Special Area of Conservation (SAC) to the south of the Application Site which is a habitat for Barbastelle bats which are protected by law. Full bat surveys including those for roosting and activity, have been undertaken and are documented in Chapter 7 Ecology of the ES **and ES Addendum**. The Applicant has also undertaken a Habitat Regulations Assessment in consultation with Natural England and it has been concluded that there would be no detrimental impacts on bats. The Applicant is also providing measures for enhancement and have been in consultation with the Sussex Wildlife Trust

who own Northup Copse and West Sussex County Council, to establish the preferred methods of enhancement. Lighting has been designed to be inwards and downwards facing **with cowls**, using the lowest level possible for the safe function of the site and pointed away from the woodland edge to protect bats. The Application Site has also been located 15m from the woodland edge to limit disturbance. The remainder of the Application Site is in agricultural production and it is not appropriate to plant trees on the land which may affect farming practices.

10.50 An Arboricultural Impact Assessment has been carried out by the Applicant in accordance with BS5837:2012 Trees in Relation to Design, with all tree surgery work to be undertaken in accordance with BS3998:2010 British Standard Recommendations for Tree Work and BS5837:2012 Trees in Relation to Design, Demolition and Construction. The Arboricultural Impact Assessment recommends a number of processed for protecting the roots, trunks, branches and stems of the trees which have been incorporated into the design of the Proposed Development. This includes;

- Defining the root protection area (RPA) which is a maximum of 15m and installing protection barriers and ensuring construction does not take place in this exclusion zone;
- Ensuring these barriers remain intact throughout the construction process;
- Installing porous ground protection measures to avoid compaction of the underlying soil beneath unmade access roads where the RPA extends underneath these;
- Taking care as to the nature of materials stored near the protective barriers;
- Root protection barriers should also provide sufficient protection for above ground parts and the spread of the crown, with any pruning being undertaken under the recommendations of the Arboriculturalist.

10.51 These measures ensure compliance with Policy BE14 of the Local Plan through the protection of trees, biodiversity and designations.

Policy RE7 and RE8

10.52 The Proposed Development will not damage, destroy or adversely affect any sensitive ecological sites as detailed in Chapter 7**A** Ecology of the accompanying ES **and ES Addendum**. A comprehensive and robust series of ecological assessments for protected species has been undertaken as part of the Environmental Impact Assessment in consultation with WSCC and Natural England. The surveys have been undertaken in accordance with legislation and best practice guidance to ensure the protection of the surrounding designations and providing enhancements where appropriate.

10.53 The ecological surveys and Habitat Regulations Assessment carried out by the Applicant's ecologists draw upon a number of conclusions for The Mens and Ebernoe SSSI and SAC's, Northup Copse SNCI/Ancient Woodland and Trees, and bats;

- No direct impacts on the SSSI or SAC are expected during any Phase of the Proposed Development due to distance between designations and Application Site;
- No night time working ~~or illumination~~ **and limited illumination** during Phase 1 and 4, so no adverse effects on conservation status of bats or integrity of The Mens or Ebernoe;
- No loss of woodland or trees with mitigation proposed including a 15m buffer from the Application Site;
- Some disturbance to woodland edge during Phase 1 and 4 which will be temporary, very limited and localised;
- There will be no loss or fragmentation of bat habitats;
- the scheme has been designed to reduce artificial light spill levels at the woodland edge which is the main commuting and foraging route for bats, to **<**0**.1** Lux during Phase 2 and 3;
- noise levels at the woodland edge will be attenuated to c.45dB(A) and the effects will be localised, temporary, and reversible and therefore no adverse effects on the conservation status of Barbastelle bats are expected.

10.54 Due the careful design of the Proposed Development, its small scale and temporary nature, no significant adverse effects are predicted.

10.55 As no significant effects are predicted, no mitigation measures are proposed beyond those already designed in to the Proposed Development. In line with current planning policy, enhancements will be made to the site to benefit the local bat population. Fifteen bat boxes will be provided to the Council. These will include at least five boxes designed to specifically attract Barbastelle bats. The boxes will be installed during the construction phase of the project and left in situ in perpetuity. The boxes will be checked after one year by a suitably qualified ecologist to determine whether bats use the boxes for roosting. The survey results will be submitted to the Sussex Biodiversity Records Centre. The Proposed Development is therefore considered to be consistent with Policy RE7 and RE8.

Policy TR6

10.56 The Proposed Development would not impact on the PROW network and there are no PROW which cross or run adjacent to the Proposed Development. It would not be appropriate to encourage or provide cycling facilities in the design of the Proposed Development because public access is not provided.

10.57 The Proposed Development would utilise the A272 to the south of Wisborough Green before joining Kirdford Road (Route 1) which leads to an existing agricultural access and track that serves the Application Site. Following the public consultation exhibition held by the Applicant in June 2013 and a further consultation exercise with Wisborough Green and Kirdford Parish Councils in July 2013, the Applicant reviewed the possibility of using an alternative route from the A272 to the B2133 and Skiff Lane (Route 2) at their request.

10.58 As concluded in Chapter 10**A** Transport and Access of the ES **and ES Addendum**, Route 1 is considerably shorter than Route 2. The highway standard for Route 1 is suitable for the type and volume of construction traffic proposed. The highway standard for Route 2

is generally suitable for the type and volume of construction traffic proposed. However accommodation works would be needed at the junction of Skiff Lane / B2133 to enable northbound traffic to turn left into Skiff Lane safely, and also at the junction of Skiff Lane and Kirdford Road. Accommodation works may also be required at the junction of the B2133 and A272. Consultation with the Highways Department at WSCC also concluded that their preferred route would be to use Route 1.

10.59 It is proposed to make modifications to the existing field access for the duration of the construction period which has been designed to safely accommodate the conventional and unconventional Heavy Goods Vehicle (HV) traffic associated with construction works. A Stage Road Safety Audit has been undertaken and is provided in Chapter 10**A** Transport and Access of the ES **and ES Addendum**.

10.60 Notwithstanding the relatively low volumes of traffic movements forecast for the Proposed Development, a Traffic Management Plan (TMP) would be prepared with the focus of minimising disturbance which could potentially arise from construction traffic. The key elements of the TMP would include:

- Where identified as necessary for unconventional HV traffic, police presence and assistance with traffic control will be arranged;
- Routing traffic to the Assessment Site in order to maintain HV traffic on WSC's advisory lorry route network for as long as possible and thereby minimise the impact of construction traffic on local communities;
- Provision of a hard standing area within the Assessment Site in order to stagger vehicle arrivals and departures and therefore prevent queuing on the highway at the site entrance;
- Scheduling of construction traffic movements (equipment and materials), when possible, to avoid the peak traffic periods at the beginning and end of each day and other sensitive periods, in order to minimise any potential disturbance to local traffic or safety impacts at junctions;
- Provision of information to parish councils relating to the construction period, including any unconventional HV traffic which may be scheduled;

- Signage to identify access routes and to inform motorists that the local roads are accommodating construction traffic; and
- Wheel ~~washing~~ **cleaning** on site and road sweeping carried out to keep the local highway clear of mud and debris.

10.61 It is proposed that the preparation of the TMP would be a planning condition and that the TMP would be prepared and agreed with the Highway Authority prior to commencing activities on site. Following the implementation of the mitigation measures outlined in this chapter, residual Transport and Access effects are assessed as being negligible. The Proposed Development is therefore in accordance with Policy TR6 of the Local Plan.

11.0A SUMMARY AND CONCLUSIONS

A11. Chapter Alterations

A11.1 This Section of the Revised Planning Statement has been updated in respect of the following:

- **Minor amendments to text following ES Addendum**

11.1 This **Revised** Planning Statement has been prepared by Celtique Energie ("The Applicant") in support of the development of the Wisborough Green-1 exploratory well site south of Boxal Bridge, Kirdford Road. The application has been submitted to West Sussex County Council (WSCC) under the provisions of Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004. As detailed herein, the Proposed Development consists of four separate Phases and has been assessed in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.

11.2 The Applicant is an independent upstream Exploration and Production (E&P) company with a number of projects focused on onshore Europe including the Central Weald Basin in the UK. The Applicant is committed to sustainable development of high quality energy infrastructure to ensure that reserves are developed responsibly and in an environmentally sensitive manner.

11.3 In respect of the need for the development, there is significant data from the Department for Energy and Climate Change (DECC) which evidences the decrease in production of our indigenous oil and gas supplies, and our increasing dependence on foreign imports to satisfy energy demands. DECC conclude that these decreases stem from a number of unexpected slowdowns on the UK Continental Shelf (UKCS), as well as general decline in UK production from the UK's established fields. Since 1970, total primary energy consumption in the UK has changed from the predominant use of solid

fuels, to an increasing and now dominant use of natural gas as the primary source of energy consumption in 2011.

11.4 The enclosed data illustrates the sustained and significant demand for oil and natural gas in the UK, our continuing dependency on fossil fuels and the need for indigenous supplies and new infrastructure to fulfil the Governments national energy strategy. Without further investment and extraction of our indigenous fossil fuel supplies, there is a concern that international competitive markets may not be able to ensure that sufficient capacity is made available during times of peak demand. The dependency on foreign imports for gas supply creates further risk to security of supply although the UK does maintain capacity for gas storage. The ability to meet demands for gas, whether on a particular day or over a more prolonged period such as a severe winter, is particularly important in a security of supply context. Price, production conditions and contractual agreements all have an impact on the supply of natural gas from each of the sources of supply – UK production, imports from Europe, Liquid Natural Gas (LNG) and storage.

11.5 The demand for oil and gas in the UK has exceeded our domestic supply since 2004 for gas and 2006 for oil, with figures on "Oil and Gas Projections" produced by DECC in March 2010 indicating that by 2025 the UK will be dependent on foreign imports for oil and gas, by 60% and 68% respectively. The UK's onshore oil and gas industry fully supports the development of renewable energy technology but still has a responsibility to meet the nation's need for fossil fuels until such a time when our demand for energy can be satisfied by renewable energy sources. The ability for renewable energy sources to meet the demands for energy in the UK is likely to take longer than anticipated with renewable energy sources currently providing a relatively small percentage of the UK's energy mix.

11.6 The development of renewable energy sources and their integration into our existing energy infrastructure will require significant investment and development before it will replace the demand for oil and natural gas. During this transition, it is important that our security of supply is increased to prevent the detrimental impact that a restricted fossil fuel supply would have on our economy and society. Notwithstanding the contribution

our indigenous supplies of oil and gas makes to ensure the continued running of our homes, business and transport systems, they also make a substantial contribution to economic growth and employment.

11.7 The Proposed Development falls within PEDL 234 which covers an area of 300sqkm and falls on land to the south of Boxal Bridge, Kirdford Road, Wisborough Green, West Sussex, and was identified following a robust and comprehensive Alternative Sites Assessment (ASA) which accompanies the submission of this planning application. The application seeks permission to explore the potential of the Central Weald Basin, and the Proposed Development would be constructed and operated by the Applicant, in accordance with statutory requirements and industry best practice. This application does not seek planning permission for hydraulic fracturing which will not be used on the Wisborough Green-1 well.

11.8 The siting, layout and design of the Proposed Development has been a result of significant research and assessment by suitably qualified consultants, site visits and consultation to ensure the most technically and environmentally suitable site has been identified. The Proposed Development has been located to minimise visual intrusion and limit noise effects to neighbouring properties. An existing field access has been incorporated into the scheme to provide access off Kirdford Road. Careful consideration has been given to mitigating effects on the local landscape and ecology, and all assessments have been carried out in accordance with European policy on EIA development, and national and local planning policy.

11.9 Based on the above, it is the worst case scenario which has been assessed in the ES **and ES Addendum** although it should be noted that the impacts are anticipated to be considerably less than those detailed in this ES **and ES Addendum**, as the best case scenario is the likely development programme.

11.10 The Proposed Development is consistent with national and local sustainability objectives as it seeks to make the best use of domestic energy reserves, whilst incorporating design solutions and mitigation measures to help protect the environment and local amenity.

Hydrocarbons also play an integral role in renewable energy strategies for energy generation as the primary back up for wind or solar intermittency. Therefore it is clear that for the foreseeable future oil and gas will be crucial to the UK's energy requirements and furthermore to the delivery of sustainability objectives at both national and local levels.

11.11 The NPPF places great weight on the conservation of landscape and scenic beauty with National Parks, the Broads and AONB's being given the "highest status" for protection. The Proposed Development is not located within a National Park, the Broads or an AONB although the Applicant has designed the Proposed Development and incorporated mitigation measures to ensure protection of the landscape and scenic beauty at the Application Site and designations beyond its boundary. The conservation of wildlife and cultural heritage is also considered to be of "importance" except in National Parks or the Broads where conservation is given great weight. The benefits of mineral extraction are given great weight regardless of location although preference is for development outside of designated areas where practicable.

11.12 Based on policies in the NPPF, the Proposed Development is therefore considered to fall in an area where conservation of the landscape and scenic beauty is given great weight although not the highest status, wildlife conservation and cultural heritage are of importance and the benefits of mineral extraction is given great weight. As concluded in the ES the Proposed Development will not have significant adverse impacts on the designations where great weight or importance should be afforded, and the great weight placed on the importance of mineral extraction therefore indicates that the Proposed Development should be approved.

11.13 The Application Site is the most technically and environmentally suitable site for the Proposed Development which has been designed taking into consideration national and local planning policy. The ES **and ES Addendum** along with this **Revised** Planning Statement conclude that there will be no long term adverse or irreversible impacts to the local environment and that the Proposed Development is in accordance with national planning policy and the Development Plan.