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**BARTON
WILLMORE** bartonwillmore.co.uk
7 Soho Square
London
W1D 3QB
T/ 0207 446 6888

BY COURIER

Jane Moseley
County Planning
West Sussex County Council
County Hall
Chichester
West Sussex
PO19 1RH

23074/A5/LW

25th April 2014

Dear Jane,

**PROPOSED EXPLORATION WELL SITE AT LAND SOUTH OF BOXAL BRIDGE, NORTHUP
FIELD, WISBOROUGH GREEN, WEST SUSSEX, RH14 0DD**
**"The installation of a well and associated infrastructure, including access road and soil
bunds, for the drilling of a vertical borehole and contingent horizontal borehole from
the same well for the exploration, testing and evaluation of hydrocarbons for a
temporary period of three years".**

We write on behalf of Celtique Energie Weald Ltd (the 'Applicant') with respect to the request for further information under Regulation 22 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2011 (the 'EIA Regulations') pursuant to the submission of the above application (reference WSCC/083/13/KD).

Amended and additional plans have been prepared to address the comments received. An Environmental Statement Addendum (ES Addendum) has been prepared. This updates the ES chapters as required with respect to the following points:

- Relevant comments from the request for further information; and
- Assessing a parameter based approach. Due to the uncertainty surrounding the availability of a particular model of drilling rig, it is the Applicant's intention that details of the rig specification be secured by planning condition. The ES Addendum assesses the 'worst case' of all potential rigs and site layouts within the well pad. This will ensure that the likely significant effects of the future rig and operations on the environment will be equal to, or better than, those assessed within the ES Addendum.

In addition, a revised Arboricultural Assessment and two additional archaeological reports have been prepared (Geoarchaeological Desk-top Assessment and Geophysical Survey). Agricultural Holding Certificate E is also resubmitted to clarify the land ownership.

This letter sets out the scope of the updates and contains clarification to address the queries not addressed in the revised documents.



ES 29617

Registered in England
Number: 00342692

Barton Willmore LLP
Registered Office:
Beauchamp Farmhouse
Beauce Close
Garscton
Reading RG31 7BW
T/ +44 (0)118 943 0801

Drawings for Approval

The following drawings are included in the further information submission. Where a submitted plan has been revised, the previous version is given in brackets. The last five are new plans. The entrance to the well pad from the access road has been moved further south, further away from the badger sett:

Revised:

3582 P 01 (F) G LOCATION PLAN 1:10,000
3582 P 02 D SITE OF APPLICATION 1:2,500
3582 P 03 (D) F GENERAL ARRANGEMENT PLAN 1:2,500
3582 P 04 (D) E ACCESS TRACK EXISTING 1:500
3582 P 05 (D) E PROPOSED SITE EXISTING GROUND PLAN 1:500
3582 P 06 (C) G ACCESS TRACK PROPOSED 1:500
3582 P 07 (D) J PROPOSED SITE CONSTRUCTION 1:500
3582 P 08 (E) H PROPOSED SITE DRILLING 1:500
3582 P 09 (E) J PROPOSED SITE LIGHTING LAYOUT 1:500
3582 P 10 (E) K PROPOSED SITE SHORT TERM TESTING 1:500
3582 P 11 (D) K PROPOSED SITE EXTENDED WELL TESTING 1:500
3582 P 12 (D) J PROPOSED SITE RETENTION 1:500
3582 P 13 (C) E EXISTING SITE SECTION 1:500
3582 P 14 (D) L PROPOSED SITE SECTIONS DRILLING 1:500
3582 P 15 (D) K PROPOSED SITE SECTIONS EXTENDED WELL TESTING 1:500
3582 P 16 (C) J PROPOSED SITE SECTIONS RETENTION 1:500
3582 P 17 (B) D SITE CONSTRUCTION SECTIONS 1:50
3582 P 18 (C) E SIGHTLINES AND SIGHT ENTRANCE PLANS 1:1,250/1:200
3582 P 19 (D) E ACCESS TRACK REINSTATEMENT 1:500
3582 P 20 (D) E PROPOSED SITE REINSTATEMENT PLAN 1:500

New:

3582 P 21 CABINS PLANS AND ELEVATIONS 1:100
3582 P 22 D PROPOSED SITE SECTIONS CONSTRUCTION 1:500
3582 P 23 A ENTRANCE PERSPECTIVE IMAGES N.T.S.
3582 P 24 SWEPT PATH AT BOXAL BRIDGE 1:1,250/1:200
3582 P 25 SWEPT PATH AT WISBOROUGH GREEN 1:500

Parameter plans have been prepared and are included as figures within the ES Addendum. They are:

3582 P 26 E RIG EQUIPMENT AND PARAMETERS PLAN 1:500
3582 P 27B RIG EQUIPMENT AND PARAMETERS SECTION 1:500
3582 P 28B RIG PARAMETERS 1:250

Planning Statement

An updated Planning Statement has been included with the submission.

ES Addendum

The table below sets out the structure of the ES Addendum. The Preamble chapter of the ES Addendum describes the scope and content in detail. Updated or new figures and appendices are located after the relevant chapter of the document.

Table 1 ES Addendum Structure

ES Chapter	Author	ES Addendum Chapter
N/A	Barton Willmore	Chapter A. Preamble
Chapter 1 Introduction	Celtique Energie Weald Ltd	Chapter not updated
Chapter 2 EIA Methodology	Celtique Energie Weald Ltd	Chapter not updated
Chapter 3 Application Site and Surroundings	Celtique Energie Weald Ltd	Chapter not updated
Chapter 4 Project Description	Barton Willmore/ Celtique Energie Weald Ltd	Chapter 4A Project Description
Chapter 5 Need and Alternative Sites	Barton Willmore/ Celtique Energie Weald Ltd	Chapter 5A Need and Alternative Sites
Chapter 6 Construction Programme & Management	Barton Willmore/ Celtique Energie Weald Ltd	Chapter 6A Construction Programme & Management
Chapter 7 Ecology	URS	Chapter 7A Ecology
Chapter 8 Landscape & Visual	Terra Firma Consultancy	Chapter 8A Landscape and Visual
Chapter 9 Noise and Vibration	ACIA Engineering	Chapter 9A Noise and Vibration
Chapter 10 Transport and Access	Royal Haskoning DHV	Chapter 10A Transport and Access
Chapter 11 Ground and Groundwater Protection	Hydrock	Chapter 11A Ground and Groundwater Protection
Chapter 12 Lighting	Royal Haskoning DHV	Chapter 12A Lighting
Chapter 13 Socio-economics	Celtique Energie Weald Ltd	Chapter not updated
Chapter 14 Statement of Significance	Celtique Energie Weald Ltd	Chapter not updated
Chapter 15 Air Quality	Air Quality Consultants	New chapter prepared
Non-Technical Summary	Barton Willmore	Addendum Non-Technical Summary

Technical Reports

A Geoarchaeological Desk-top Assessment and Geophysical Survey Report have been prepared in liaison with WSCC Archaeology. It has been confirmed that sufficient work has been undertaken for the planning application to be determined.

The Arboricultural Assessment has been updated to correct discrepancies between the tree works shown on the survey plan figures and described in the text (trees T1, T2 and T8). No updates are required to the landscape and visual ES chapter as a result. Given that the trees are U-grade and are shown to be removed already on plans, they would not be deemed to be of any value in landscape terms already. In terms of visual effects the views from the road at the entrance are restricted by vegetation other than the tree 2. There would therefore be no bearing on the assessment of landscape or visual effects. The chapter already mentions a small section of hedge line being removed, so no updates are required in this respect.

Agricultural Holding Certificate E

This certificate has been resubmitted to clarify the land ownership.

Responses to comments not requiring plans or reports to be updated

The following sections address comments raised that do not require plans or reports to be updated. They are organised by issue or technical discipline.

Phasing and timescales

Chapter 4 Project Description of the ES set out best and worst case scenarios for the duration of each phase of the project. Whilst the sum of the worst case scenarios equates to just over 18 months, it is very unlikely that the worst case scenario time frame would be required for every phase. It is also important to note that the four phases will not be carried out immediately one after the other, resulting in pauses between particular phases. For example, there may be a period of a few months between Phase 1 and Phase 2 whilst a rig is contracted, or a period of several months between Phase 3 and Phase 4 whilst test results are analysed. During operations, if some phases do require the worst case time frame or there are longer pauses between phases, time would be made up later in the programme to keep to the 3 year period. It is the Applicant's intention that all works under the planning permission would be completed within a 3 year period in accordance with the temporary consent sought.

Ecology

In line with current planning policy, opportunities to enhance the site's biodiversity have been considered. As the site itself is an arable field, which will be restored after the investigations have been completed, opportunities for enhancements are limited to the field boundaries. Long-term management is not appropriate as the neither the site, nor its surrounds will be under the control of the Application once the operations that are the subject of the planning application cease. Celtique Energie has agreed to make a one off contribution to enhancements by supplying a range of bat roost boxes, suitable for barbastelle bats and other species, to WSCC for installation in the area.

As the understanding of barbastelle bat flightlines and foraging behaviour is essential to the conservation of this rare species, the Applicant will also fund the monitoring of bat surveys around the site for the duration of the investigative work. The information gathered during these surveys will be shared with the Wildlife Trust and other conservation organisations and will contribute to the conservation of the population of this important species of bat within the county for the future.

With respect to additional comments received from Sussex Wildlife Trust in their letter dated 11th December, 2013, the scheme has been designed to avoid any impacts on bats roosting in the woodland and foraging and commuting along the woodland edge. The site is separated from the woodland by a 15m buffer. Furthermore, the lighting across the site has been significantly modified to avoid light spill onto adjacent habitats. The results of lighting models presented, in Figures 12.1, 12.2 and 12.3 of Chapter 12A: Lighting of the ES Addendum, show that illumination at the woodland edge will be <0.1 lux. A recent study of the effects of lighting on bats defined a dark site as one where illumination was below 0.5 lux and species of bats, including barbastelle bats, were recorded foraging in these areas¹. It is concluded that this level of illumination at the site will not impact on bat behaviour. As bat activity will not be impacted by the scheme, further surveys of bat roosts and flightlines would not contribute any useful information to the assessment. Chapter 7A: Ecology states that a detailed bat roost assessments would be undertaken of trees identified as having the potential to support roosting bats, only where arboricultural works are

required. In order to protect bats, these surveys would be undertaken immediately prior to any tree works to ensure bats are not present when the trees are subject to works.

The Sussex Wildlife Trust also requested information on nightingales and other songbirds. Nightingales are summer visitors to Britain and whilst their numbers are in decline, they are not listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) and therefore receive no special protection from disturbance whilst breeding. However, a precautionary approach has been taken to reduce impacts on all birds; the 15m buffer between the site and the woodland edge, together with the bunds will reduce noise levels in the woodland to 45dB(A) at the nearest point, which is equivalent to routine farm operations undertaken on arable land throughout the county. Furthermore, a preconstruction check for Schedule 1 birds using the woodland and skylarks nesting in the site will be undertaken to ensure that these species are considered during the works. Given the small scale of the scheme and the measures set out above, it is concluded that the scheme will not impact on the conservation status of birds or breach wildlife legislation.

Transport and Access

The highways consultants have been liaising with Dominic Smith of WSCC Highways in respect of this application and comments raised. The ES chapter has been updated to address comments received, where relevant. There are a couple of points to be considered outside of the ES Addendum:

1. Construction Traffic Management Plan (CTMP) – it is not possible to finalise the CTMP until after the end of the consultation period as all comments are required. The submitted ES includes a list of the measures to be introduced and, following discussion with officers of WSCC, more detail has been provided in the ES Addendum. There is not anything else that could be added at this stage in terms of meaningful detail. The detailed CTMP could be secured by condition.
2. Parking – the highway consultant's recommendation is that we do not have parking restrictions due to the temporary nature of the works and low traffic volumes. However, the Applicant proposes to keep an open dialogue with the Parishes to ensure that the Applicant knows about events in advance which are likely to cause parking pressure around the green and avoid bringing vehicles to site during these times. Swept path drawings for Boxal Bridge and Wisborough Green have been submitted.

Confirmation of Receipt

The submission package addresses all other comments raised by WSCC. We would be grateful if you could confirm receipt of this letter and further information submission. In the meantime, please do not hesitate to contact me if have any queries.

Yours sincerely

LUCY WOOD
Director

C.C. Jenny Massingham, Planning Advisor – Celtique Energie Weald

¹ Murphy, S., Hill, D., & Greenaway, F. (2009) Pilot study of a technique for investigating the effects of artificial light and noise on bat activity. Report for People's Trust for Endangered Species