APPENDIX A.1

REQUEST FOR FURTHER INFORMATION

Michael Elkington
Strategic Planning Manager

Please respond to: James Neave
Tel: (+44) 033022 25571
james.neave@westsussex.gov.uk
www.westsussex.gov.uk

County Planning

County Hall
Chichester
West Sussex
PO19 1RH

Tel: 01243 642118

Miss. Jenny Massingham
Celtique Energie Weald Ltd,
4th Floor Newlands House,
40 Berners Street,
London
W1T 3NA

3rd December 2013

Dear Miss. Massingham,

Application Number:	**WSCC/083/13/KD**
Address:	**Land South of Boxal Bridge, Northup Field, Wisborough Green, West Sussex, RH14 0DD**
Proposal:	**The installation of a well and assocaited infrastructure, including access road and soil bunds, for the drilling of a vertical borehole and contingent horizintal borehole from the same well for the exploration, testing and eveluation of hydrocarbons for a temporary period of three years.**

With regard to the above application, West Sussex County Council formally requests further information before the Application can be determined.

Further information required under Regulation 22 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011

The submission of the following information is seen to be essential further information in respect of the application to verify the particulars of the submitted development proposals, and/or to enable proper consideration of the likely environmental effects. Notwithstanding any further information that may later be deemed necessary, the following information will be required to enable West Sussex County Council to determine the application. If the requested information is not supplied, then the likely conclusion would be a refusal of the application on grounds of lack of information.

Amended/Additional Plans

- Plans must be revised to include spot heights and/or contours that accurately illustrate existing and proposed levels of the site (including details of levels at the point where the access track meets the well site).
- The current sections plans do not accurately correspond with the site plans (i.e. section B-B not in the correct location) or descriptions within the Environmental Statement (i.e. bunds at approx. 3m, boundary fence at 2m in height and Flare bunding at 2.5m?). This must be revised accordingly.
- Elevations plans must be provided that illustrate the site in the context of its surroundings. Versions should be provided for the various phases of the development and illustrate the flare (worst case height).
- The proposed access track plan (3582 P06 RevC) and site plans for the various stages should be annotated to detail surfacing materials. In this regard it is currently unclear if there is to be any resurfacing of the existing track, and where

concrete pads/wheel washing areas are to be located within the well site (referred to ES text).

Where amended plans are proposed they should be allocated a new 'revision' number and any plans to be superseded should be identified.

Heritage/Archaeology

- Further archaeological assessment and surveying is required in the form of desk based assessment, geophysical surveying and associated reports. Your attention is drawn to the comments of WSCC Senior Archaeologist (dated 19/09/2013)

Landscape

- Proposed tree works should be clarified. In particular attention should be given to the following;

- The Tree Survey Plan (Fig 4.5) seems to suggest tree T2 is to be removed yet the ES text (4.18) suggests only minor crown lifting works are proposed. Please clarify.

- Para 4.18 of the ES suggests that trees T1 and T2 are to have tree works and no other works proposed. It is not clear if any tree works are proposed for tree T8 (Fig 4.2 suggests works are proposed, as does the Arboricultural Assessment)? In addition, the Arboricultural Assessment recommends works to W7, is this proposed? Section 7 of the ES does not detail any works other than two crown lifts.

- Para 6.40 of the ES recommends a plate is to be used over tree root protection areas at the access. Please confirm or otherwise if this is referring to Cell Web as detailed in the Arboricultural report.

- Para 4.22 of the ES it is suggested that approximately 1.5m of poor hedgerow will need to be removed at the site access. However, this is not indicated on any of the plans (Fig 4.3 /4.6) or referred to in the Arboricultural report? Plans will need to be amended. In addition, Para 6.42 suggests that removed hedgerows would be replaced with young whips. The locations of such planting should be detailed in restoration plans for the site.

Highways

- Further information is required as set out in WSCC Highways comments (dated 21/11/13).
- A number of parties have raised the issue of flooding at Boxal Bridge and the potential for the road becoming impassable. The applicant must indicate what mitigation would be proposed for site traffic during such an event, and if this has/will be incorporated into the CMP and/or TMP.

Lighting

- Further information relating to the lighting arrangements for the site must be provided. This should include details of all proposed lighting units for all phases (including all rig lighting), cowling/shielding measures, and an assessment of potential light spill from the site including light contour plans. Potential light arising from the flare should also be considered.
- Clarification should be provided as to the required lighting during an extended well test period. Fig 5.2 seems to show lighting on the site cabin but no key is provided.

Ecology

- Taking into account the above lighting information, clarification must be provided as to the consideration that has been given to the potential for light/noise to impact upon bats and neighbouring woodland and associated ecology.
- A summary of all questions and answers pertaining to bat survey methodology (as discussed between the WSCC Ecologist and Applicants Ecologist) must be provided. In addition, the submission of all bat survey data that has been collected to inform the development proposals must be provided.
- Clarification must be provided setting out badger sett locations in relation to proposed working areas (please mark as confidential) and an indication of how the proposed works would accord with Natural England Standing Advice.

Potential Impacts on horses and livestock

- Further information is required detailing the consideration given to potential impacts upon nearby livestock and horses, particularly with respect to noise and vibration.

Vibration

- Clarification must be provided with respect to the potential impacts of vibration, including details of any relevant industry standards and, based on similar operations, an assessment of the likelihood of vibration being felt at surface locations.

Noise

- It must be demonstrated that consideration has been given to the potential for low frequency and tonal noises associated with the development. Please see the comments of Chichester District Council (dated 13/11/13).
- A simplified noise report must be provided that sets out existing and predicted noise levels in clear and simple terms for easy assessment against *DCLG Technical Guidance to the National Planning Policy Framework (March 2012)*. It is recommended that this be presented in the form of a table that sets out existing background levels at each receptor, and predicted noise levels at each receptor for each phase of the development during both daytime and night-time conditions. The units of noise measurement should be presented in the same format as that set out in DCLG Technical Guidance for ease of reference and it should be clear whether predicted noise levels include any contribution from background noise levels.
- Details must be provided indicating the consideration that has been given to prevailing wind conditions and screening/topography, and how this might affect predicted noise levels at sensitive receptors.
- Details must be provided setting out the consideration that has been given to the potential impacts of noise upon neighbouring land (e.g. Northup Copse & neighbouring fields). In this regard it is highly recommended that a noise contour plan be produced setting out the predicted noise levels for each phase of the proposed development.

Air Quality

- Clarification must be provided indicating how the air quality survey has taken into account all sources of potential emissions to air arsing form the development and associated impacts (including road traffic impacts). Where appropriate reference should be made to relevant regulatory regimes (e.g. flare emissions).

Phasing

- Clarification must be provided setting out if phases 3a and 3b would be carried out consecutively or simultaneously.
- Clarification of drilling rig demobilisation periods must be provided so it is clear what phases would require the rig on site. It is suggested that phasing as set out at ES 4.11, Table 4.2 is updated accordingly.
- Clarify whether only phase 3b, Lateral Exploration Well, constitutes an 'Extended Well Test' as referred to in the ES text.

Site Selection Assessment

- Further clarification is sought with regard to how the primary and secondary search areas were defined, in particular, the extent and nature of geological data used and drilling manager/operations manager selection criteria/constraints.

Recommended Information to be supplied (not requested under Regulation 22).

In addition to that detailed above, the County Council would also strongly recommend that the applicant investigates the following points.

- Given planning policy objectives to preserve and 'enhance' biodiversity it is considered that the applicant should demonstrate the opportunities that have been considered for enhancement. It appears there are a number of opportunities identified within the ES (e.g. supplementary tree planting and improvement of woodland block W7, as referred to in Arboricultural Assessment (Appendix 7.5)).

- It is understood that proposed security fencing is to be increased in height. This should be clarified and detailed on all relevant plans/sections.

- With regard to the submitted Agricultural Holding Certificate E, applicant ownership of the land should be clarified.

The target determination date for the application is 30th December 2013 and, such is the nature of the request, further publicising and consultation will be necessary, thus there is likely to be a need to extend the timescale for determination. I would be grateful for your confirmation that an extension to the timeframe for determination until **06th March 2014** is acceptable. Please confirm by the 6th December 2013.

In light of this, and with the intention of moving the application forward towards a resolution, West Sussex County Council formally requests that the further information be provided no later than **30th December 2013**. If this date is not achievable, please provide a date that West Sussex County Council can expect to receive the information. It is also advised that the information should be presented in a single supplementary submission.

If you require any further clarification or if you wish to discuss the information requested, please feel free to contact me.

Yours sincerely

James Neave
County Planning