



MINERAL SURVEYING SERVICES LIMITED

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E.Mail: oldridgemark@gmail.com

Our ref: MGO/BOS/001.

Your ref:

Mr Chris Bartlett
Principal Planning Officer
Strategic Planning
West Sussex County Council
County Hall
Chichester
West Sussex
PO19 1RH

11th December 2017

Dear Mr Bartlett,

Re: Angus Energy Limited – Retention of Oil Production Site and 2 Production Wells for Hydrocarbon Extraction, Processing and Distribution, Lidsey Oil Site, Near Bognor Regis, West Sussex PO22 9PH.

Request for Screening Opinion in Accordance with The Town and Country Planning (Environmental Impact Assessment) Regulations 2017.


1. Introduction

I am writing on behalf of my client, Angus Energy PLC, to request a formal Screening Opinion in relation to proposals for the retention of an existing oil well site and 2 existing boreholes to produce hydrocarbons at Lidsey Oil Site, Lidsey, near Bognor Regis, West Sussex.

We propose to submit a detailed planning application for the above development at the site and this letter considers whether the application should be subject to an Environmental Impact Assessment (EIA) for the present regulations.

2. Background

Planning permission reference BN/31/05 dated 17 February 2006 contains various planning conditions which govern general operations permitted at the site for the production, treatment and export of crude oil from the site. Condition number 2 limits the existing consent to 12 years and it is necessary to now submit a planning application to retain the existing site infrastructure and 2 production wells (Lidsey X1 and Lidsey X2). This application seeks to extend the continued use of the well site to enable crude oil to be produced and exported for a further period of 10 years beyond the expiry date of the present planning permission.



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The boreholes have targeted the Upper Kimmeridge limestone, Top Corallion Limestone, Top Cornbrash and Top Inferior Oolite Formations, and production zones for the currently productive Lidsey Oilfield.

3. The Site and Surrounding Area

The site is located within the Arun District of West Sussex and has been developed as an oil production site together with supporting oil storage and processing plant, workshops, site generator and administration facilities.

The site lies approximately 0.6 km east of Lidsey, 1 km south west of Shripney and 1 km south of Woodgate. Land to the north, east and west is predominantly in agricultural use with an operational sewage treatment works adjacent and to the south of the site.

Footpath Number 200_1 runs in a general east-west direction along the Southern Water access road leading to the site and Footpath Number 296_1 runs in a southerly direction to Sack Lane from the access road and west of the site compound.

The closest residential properties are Lidsey Farm buildings just off Lidsey Road approximately 585 metres to the south-west and Woodgate caravan park approximately 500 metres north of the site.

4. The Proposed Development.

The proposed development involves retention of the existing two wellheads and boreholes to enable renewed production operations for the Lidsey X1 well and the recently drilled Lidsey X2 production borehole both as indicated on the accompanying site plan and within the confines of the site. All proposed surface operations will continue to be undertaken within the confines of the existing fully enclosed and fenced well site.

The site is provided with site administration facilities, storage containers for site equipment, electrical generator container, mess and wash rooms, toilet facilities and site security facilities. Permanent lighting units are already provided for essential safety purposes. The oil production facilities include four oil storage tanks, a water holding tank and a 3 phase separator for oil, water and gas.

The production process involves crude oil, water and gas flowed from the wellheads to a separator which directs fluids into the on-site storage tanks. Produced water is re-injected into the same reservoir or exported to an off-site treatment facility by licensed waste carrier. Treated crude oil is loaded onto road tankers and exported to approved oil storage facilities.

5. The Screening Process.

The provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (The Regulations) enables developers to obtain an opinion from the competent planning authority on the need for EIA. The Directive also extends the range of projects to which EIA applies and requires outline of the main alternatives considered to the

development proposed. In addition to the EIA regulations and directives, there is substantive guidance that further informs the EIA process, including the following:

- Planning Practice Guidance
- Environmental impact Assessment: A Guide to Procedures (DETR, November 2000).

Development that is deemed to fall within Schedule 1 of the Regulations always requires EIA and is referred to as "Schedule 1 development". Development listed in Schedule 2 that is in a "sensitive area" or exceeds one of the relevant criteria or thresholds outlined in Schedule 2 is referred to as "Schedule 2 development". However, not all "Schedule 2 development" will require an EIA; only that development likely to have significant environmental effects due to its size, location or nature. Development that requires EIA is referred to as EIA development.

The proposed continued site operations lie within an existing operational compound which has been approved and developed under the terms of the planning permission issued in 2006.

The Regulations require screening to be undertaken with reference to the selection criteria set out in Schedule 3 of the Regulations. It is therefore important that these are considered. The relevant sections which cover the selection criteria set out in Schedule 3 are:

- i) Characteristics of the Development;
- ii) Location of the Development; and
- iii) Characteristics of the Potential Impacts.

It is considered that the potential for significant effects for the proposed development should be considered against the characteristics which currently exist. The effect attributable to the proposed development therefore should only be that of and above the effects already caused by the use of the site.

With regard to the current approved development, being the retention of the wells and proposed continued use, is within a general environment which has no elements of sensitivity and hence highly unlikely to cause significant environmental disbenefit.

6. EIA Screening

General information on the proposed development is set out above, however further information is presented below which is intended to assist in consideration of the proposals and why we consider that the proposed exploratory works do not comprise EIA development.

Human Beings and Material Assets

Society and Economics

The proposed development involves a continued programme to extract oil from the existing two production wells and thereafter an increase in crude oil output from the site which is a direct result of increased demand for the hydrocarbons. The site continues to employ local personnel and given a projected life of some 10 years it is considered that employment opportunities are beneficial in the local context.

Transportation

The proposed development will involve HGV movements from the site to deliver oil products and receive fuel and essential site equipment however, the number of vehicle journeys will be no more than that originally suggested in the 2006 planning application. This application advised of 8 return journey per week by road tankers carrying crude oil and 2 return journeys delivering diesel and chemicals. However, the number of vehicles delivering diesel and chemicals may only be 1 per week. There will also be occasional vehicles removing waste from the site as outlined below. All movements will be controlled and monitored during the ongoing production period. Given that the HGV's will adopt the approved HGV route to and from the site, which is linked to a Section 106 Agreement, is considered that the continued site use is unlikely to have any significant impact on local traffic conditions or road safety.

Noise and Vibration

It is considered that the noise levels approved under the provisions of consent ref: BN/31/05 can be met with regard to the continued site operations.

The proposals do not involve the use of equipment which will give rise to excess noise or ground vibration and as such no environmental impacts will arise from the operations proposed.

Production of Waste

The continued use of the site will involve the occasional removal of waste water from the production operations and additionally the removal of general wastes from the site. The waste water will be contained and removed by specialist road haulage tankers whilst the general waste will be segregated in skips and removed to local waste recovery sites. The nature of "general" wastes will be timber, paper, scrap metal, sanitary waste and general "domestic" wastes from the on-site administrative buildings. Given the level of control over such wastes the proposed continued use of the site is not considered to create operations which will result in adverse environmental impacts.

Soil and Water

Land Contamination

The site is currently provided with substantial environmental barriers by way of sub-surface containment membranes and hard standing. The proposed continued use of the site for oil production operations will not lead to any issues in respect of land contamination due to the level of environmental containment provided. The site will continue to operate in accordance with the present planning permission, and other environmental authorisations, and no additional drainage is necessary to allow the development to take place. Accordingly, it is considered that no impact will arise in terms of land contamination as a result of the development proposed.

Hydrogeology

The design of the site has been implemented to Environment Agency licencing standards, encompassing comprehensive site drainage facilities, which will ensure that no impact arises in terms of hydrogeology as a result of the development proposed.

Flood Risk

The use of the site for continued production purposes has a very limited overall footprint (approximately 1.2 hectares). It does not lie within a designated flood risk zone and no impact in terms of flood risk will occur as a result of the continued oil production operations proposed.

Flora and Fauna

Habitats and Biodiversity

The site compound, entrance and associated HGV and car parking areas are already established, and the proposed continued site use will not involve the removal of flora or fauna. Accordingly, it is considered that there will be no impact on ecology and protected species.

Air and Climate

The proposed development involves continued production activities, with an associated approved flare, and no impacts to climate or air quality will arise. Accordingly, it is considered that there will be no impact on climate or on air quality.

Landscape and Visual Amenity

The site lies within a relatively rural environment and there is a general absence of buildings or conservation areas within the proximity of the site. The closest residential properties lie approximately 500 metres from the site and due to the existing site landscaping bund, and associated vegetation, do not have direct views of the compound. Accordingly, it is considered that no adverse visual impacts will arise as a result of the development proposed.

Cultural Heritage

Archaeology

The development and use of the oil production site, and associated access road, has already taken place and a scheme of archaeological investigation was approved under the provision of the present site planning consent. No additional areas will be disturbed by the continuation of the oil production operations proposed. Accordingly, it is considered that the continued use of the site will have no impact in terms of localised archaeology.

Built Heritage

The site does not lie within a conservation area and there are no listed buildings on or within the proximity of the site. Accordingly, it is considered that the continued use of the oil

production site, and use of the existing site access, will have no adverse impact in terms of built heritage.

7. Overall Conclusions

Having regard to the foregoing, it is considered that the proposed continued use of the site for continued oil production operations is unlikely to give rise to significant effects on the environment by way of the characteristics of the development, its location and potential environmental impacts. The planning application will not, therefore, constitute development which requires environmental impact assessment (EIA). It is requested that the West Sussex County Council takes this information into consideration when screening the proposed development for environmental purposes in accordance with current Regulations and as summarised in this letter.

I look forward to receiving confirmation of receipt of this letter and a prompt receipt of the Councils Screening Opinion in accordance with the usual statutory timescales.

Please feel to contact the writer at the address above if you have any queries concerning the submission or any associated matters you would like to discuss.

Yours sincerely,

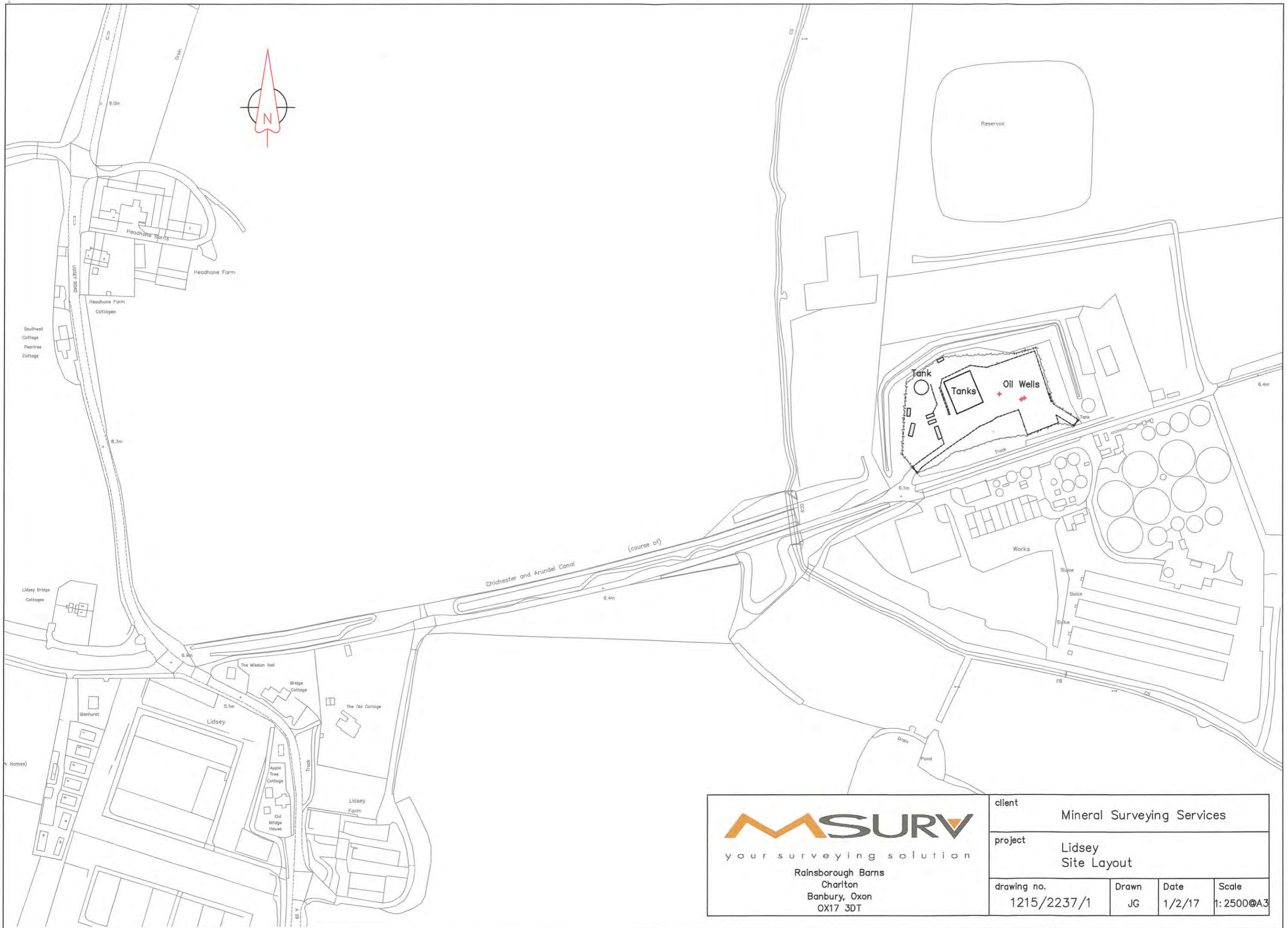
A handwritten signature in black ink, appearing to read 'Mark G. Oldridge', with a stylized flourish at the end.


Mark G. Oldridge., FRICS, FIQ

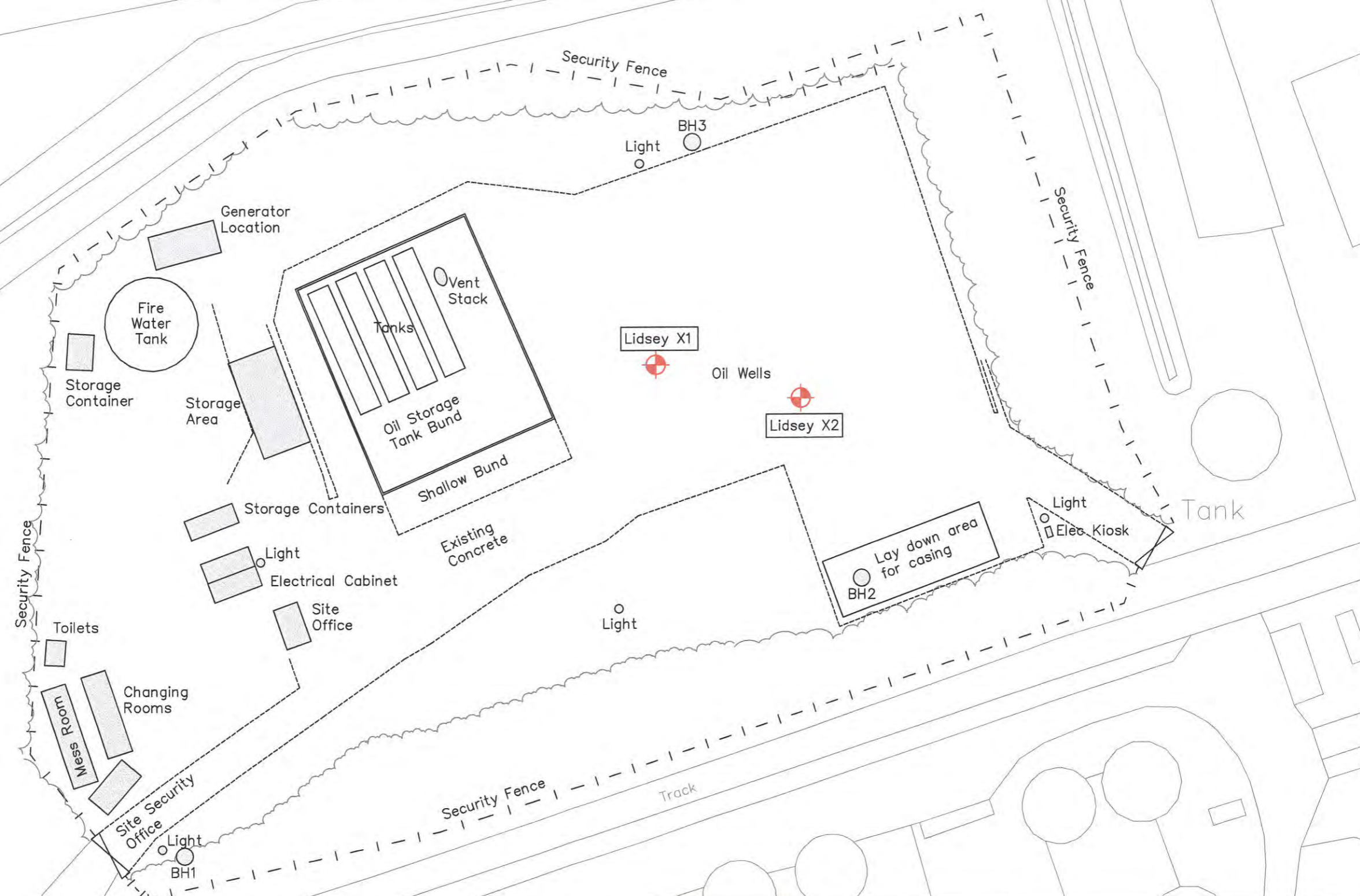
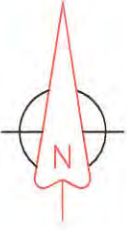
Enclosures:

General Location Plan

Site Layout



 your surveying solution Rainsborough Bams Charlton Banbury, Oxon OX17 3DT	client		Mineral Surveying Services	
	project		Lidsey Site Layout	
drawing no.	Drawn	Date	Scale	
1215/2237/1	JG	1/2/17	1: 2500@A3	



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 your surveying solution Rainsborough Barns Charlton Banbury, Oxon OX17 3DT	client Mineral Surveying Services			
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