

SCREENING OPINION

THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017

Screening Opinion reference: BN/17

Applicant: Angus Energy Plc

Agent: Minerals Surveying Services White Young Green

Date Received: 11 December 2017

Site: Lidsey Well Site, Lidsey Road, Aldingbourne, West Sussex

Proposal: Retention of oil production site and 2 production wells for hydrocarbon extraction

Planning permission was originally granted in 1985 for the establishment of exploratory boreholes at the site. Since then, various permissions have been granted, the last granting permission for production and exportation of hydrocarbons from the site until February 2018.

The applicant is now seeking to retain the well site for a further 10 years, thereby allowing production until 2028.

Classification of the Proposed Development

The proposal does not comprise Schedule 1 development, as defined in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations').

The present development proposals are considered to fall within Schedule 2 to the EIA Regulations, namely Part 13(b) as relating to a '*change to or extension of development of a description listed in paragraphs 1 to 12 of Column 1 of this table (Schedule 2), where that development is already authorised, executed or in the process of being executed.*' The development would be a change/extension to a surface installation for the extraction of petroleum/natural gas so would fall within Part 2(e) of Schedule 2.

The site is not located within a 'sensitive area' as defined in regulation 2(1) of the EIA Regulations, however, the site measures 1.62 hectares (approximately) exceeding the 0.5 hectare threshold set out in column 2 to Schedule 2, Part 2(e).

As a result of the above, with reference to Schedule 3 to the EIA Regulations, consideration needs to be given as to whether the proposed variations amendments to the approved development, along with the existing, approved development has the potential to result in 'significant environmental effects' which require an EIA'.

Characteristics of Development	
<p>Development Area</p> <p>Nature / Scale / Design of Whole Development</p>	<p>Site area – 1.62 hectares including the pad and access road.</p> <p>The proposed development would result in retaining the site for additional 10 year period, thereby allowing the production of oil and gas to continue.</p> <p>No further drilling is proposed as the boreholes are already in place. There would be no changes to the orientation, location or types of plant within the site. There would be no physical extension to the site, nor an intensification of activity.</p> <p>The proposed extension in time is sought to allow for the remaining reserves to be extracted.</p> <p>No change to vehicular movements to / from the site is proposed.</p>
Other EU Environmental Assessments Taken into Account	No EU Environmental Assessments that are reasonably available were considered relevant in making this decision.

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect?
1. Will the development involve actions that will cause physical changes in the locality (topography, land use, changes in waterbodies etc.)?	Unlikely – use of site is existing and currently active, albeit the proposals are for an extended temporary period of 10 years.	No. No physical works are proposed. No further drilling of boreholes is requested.
2. Will the development use natural resources such as land, soil, water, biodiversity, materials, or energy, especially resources that are non-renewable, in short supply or have low capacity to regenerate?	Unlikely. Some non-renewable fossil fuels would be used by vehicles travelling to/from the site, and generators used. Oil, a fossil fuel, is the primary target for extraction, and gas resulting from the production, would be flared so there would be some impact.	No significant resource use anticipated. Site is already in existence extracting oil. The scale of fossil fuel use would not be so great as to be considered to result in a 'significant effect'.

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect?
<p>3. Will the development involve the use, storage, production of substances or materials that could be harmful to people or the environment?</p>	<p>Likely. Operations involve the production of oil from a borehole and storing on-site prior to being tankered off-site. Any gas produced from the site would be flared. Storage of chemicals on-site and sanitary waste from site employees.</p>	<p>No significant effects anticipated. Existing conditional controls would remain in place under planning permission BN/31/05 covering matters including the storage of chemical, fuel and oils alongside complementary Environmental Permitting regime and Health & Safety Executive (HSE) requirements. The well-pad is in-situ and has previously been engineered to protect the water environment. Liquid and solid waste would be contained on site before being taken off to appropriate facilities; gas emissions, chemical storage and any naturally-occurring radioactive materials (NORMs) are managed through Environmental Permitting process.</p>
<p>4. Will the development produce significant volumes of wastes during construction, operation or decommissioning?</p>	<p>Unlikely. Limited waste likely to result from production, particularly as there would be no new physical development or drilling.</p>	<p>Significant volumes of waste not anticipated, and would be controlled through the Environmental Permitting process. No further drilling is proposed and, therefore, there would be no waste generated through that activity.</p>
<p>5. Will the development give rise to significant noise, vibration, light, dust, odours?</p> <ul style="list-style-type: none"> - during construction - during operation 	<p>Unlikely. Significant noise, vibration, light, dust or odour impacts not anticipated during production. The restoration of the site will result in increased activity, but impacts would be short lived and not significant.</p>	<p>No significant impacts anticipated. Any existing conditional controls would remain in place to ensure any impacts are appropriately minimised/mitigated.</p>
<p>6. Does the proposal have the potential to release pollutants to air, land, or water?</p>	<p>Likely if not appropriately controlled.</p>	<p>No significant effects anticipated given no further drilling is required, and given complementary controls through Environmental Permitting regime, as well as requirements of HSE regarding well design, construction and integrity.</p>

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect?
7. Are there areas on or around the location that are already subject to pollution or environmental damage – e.g. where existing environmental standards are exceeded, which could be affected by the project?	Unlikely. Application site is currently being used for oil production, and there is no indication that relevant environmental standards have been exceeded. There is also a wastewater treatment facility directly to the south, a small industrial unit adjacent, and the site is accessed from an A-road (the A29) but, again, there is no indication that relevant environmental standards have been exceeded.	No significant effects anticipated. No further physical works sought, so development not expected to exacerbate any damage that may be present, given controls of planning and Environmental Permitting processes, and HSE requirements.
8. Is there a high risk of major accidents and/or disasters, including those caused by climate change, during construction or operation of the development that could have effects on people or the environment?	Unlikely. Operations do not pose significant risk in terms of major accident or disaster, particularly given planning, environmental permitting and HSE controls.	No significant effects anticipated.
9. Will the project result in social changes e.g. demography, traditional lifestyles, employment?	Unlikely. No changes anticipated.	No significant effects anticipated.
10. Will the development pose significant risks to human health, for example due to water contamination or air pollution?	Unlikely. Although retention of plant and equipment, and therefore production, is sought for 10 years, controls would be in place to ensure the water environment is not adversely affected. Air emissions would be controlled through the Environmental Permitting process.	No significant effects anticipated, given no further physical works proposed and controls through planning and Environmental Permitting, and HSE requirements.

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect?
11. Are there areas on or around the location that are protected under international, national or local legislation for their ecological, landscape, cultural or other value that could be affected by the project?	Site is not located within any protected landscapes or subject to any other ecological, cultural or other designation.	No significant effects anticipated, given the distance from any designation, the mature screening and that there are no further physical works proposed. After 10 years the site would be restored to agricultural grassland.
12. Are there any other areas around the location that are important for their ecology e.g. wetlands, riparian areas, river mouths, mountains, forests, coastal zones, the marine environment, nature reserves and parks that could be affected by the project?	The Brooks, a Local Nature Reserve, is located approximately 1.9km to the south of the site.	No significant effects anticipated, given the separation by the A29, the mature screening, that there are no further physical works proposed and the ability of planning / permitting/HSE regimes to ensure measures are in place to contain emissions.
13. Are there any areas on or around the location that are used by protected or sensitive species of fauna or flora that could be affected by the project?	Unlikely. No further physical works are proposed.	No significant effects considered likely. Should further potential impacts be identified, conditions could be imposed to ensure that they would not be significant.
14. Are there any inland, coastal, marine or underground waters on or around the location that could be affected by the project?	Site is not within or near groundwater source protection zone.	No significant effects anticipated. In addition, site impermeably sealed and bunded; potential impacts on surface and groundwater controlled through Environmental Permitting and HSE regimes.
15. Are there any areas or features of high landscape or scenic value on or around the location that could be affected by the project?	Unlikely. No such features identified in vicinity.	No significant effects anticipated. Site is largely screened from wider views by mature trees and grassed bunds.
16. Is the project in a location where it is likely to be highly visible to many people?	Unlikely. Although on a PROW, the well pad is screened on all sides.	Significant effects unlikely given no physical works are proposed, and the distance from the road and the mature screening from trees and hedgerows. Flare is shrouded. The nearest residential property, the Old Cottage, is 460m to the south-west. The closest public footpath is directly south of the well pad, but only gives transient views through the access gate.

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect?
17. Are there routes on/around the location that are used by the public for access to recreation or other facilities that could be affected by the project?	Likely. The nearest PROW is directly to the south of the well pad.	No significant impacts anticipated. Although the PROW is directly south of the well pad, people cannot access the site due to fencing surrounding the well pad. The site is also screened by mature trees and grassed bunds.
18. Are there any routes on or around location that are susceptible to congestion or cause environmental problems that could be affected by the project?	Unlikely. No Air Quality Management Area in the locality. A29 subject to usual traffic.	HGV movement numbers are low and while the development would continue longer than is currently the case, the impact is not expected to be significant. Not expected to significantly exacerbate impacts of congestion or environment problems.
19. Are there any features of historic or cultural importance on or around the location that could be affected by the project?	Unlikely. No such buildings/ features within close proximity to site.	No significant impacts anticipated. An archaeological notification area lies 90m to the west but would be unaffected as no further physical works are proposed.
20. Will there be any loss of Greenfield land?	After 10 years, the site will have been restored to agricultural grassland in accordance with approved restoration scheme.	No impacts anticipated.
21. Are there existing land uses around the location that could be affected by the project?	Unlikely. Surrounding uses and agricultural land unlikely to be affected, particularly as use has been in existence for more than ten years.	No significant impacts anticipated given the contained nature of the land use.
22. Are there areas on or around the location that are densely populated or built-up, that could be affected by the project?	Unlikely. Site is within a countryside location with sporadic residential (and caravan sites), agricultural and some business enterprises in the general area so not densely populated.	No significant effects anticipated. HGV numbers accessing the site would be low and impact not likely to be significant.
23. Are there areas on or around the location that are occupied by sensitive land uses e.g. hospitals, schools, community facilities that could be affected by the project?	Unlikely. No sensitive uses identified in vicinity of site.	No significant effects anticipated.

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect?
24. Are there any areas in or near the application site that contain high quality or scarce resources that could be affected by the development, e.g. groundwater resources, forestry, agriculture, tourism, minerals?	Unlikely.	No significant effects considered likely, given ability of Environmental Permitting regime to control emissions.
25. Is the location susceptible to earthquakes, subsidence, landslides, erosion, flooding, or adverse climatic conditions that could cause the project to present environmental problems?	Unlikely. No such features present. No further physical works or drilling proposed.	No significant effects anticipated.
26. Are there plans for future land uses on or around the site that could be affected by the project?	Likely. Realignment of A29 proposed nearby, and significant areas of housing proposed to north.	No significant effects anticipated given that realignment and housing would need to take into account continuing existence of oil site.
27. Is there a potential for transboundary impacts?	Unlikely. Site is not near any boundaries.	No significant effects identified.
28. Will any effects be unusual in the area or particularly complex?	Unlikely. No complex effects anticipated.	No significant effects identified, given controls in place through planning and Environmental Permitting regimes, as well as controls through the Oil and Gas Authority and HSE.

Conclusion

This Screening Opinion relates to a proposal for a temporary, albeit 10 years extension to the permission for production at Lidsey oil well site, Lidsey Road, Aldingbourne, West Sussex. This would allow the remaining reserves of oil to be extracted prior to restoring the site back to its original state.

The site currently has permission for hydrocarbon production under planning permission BN/31/05 granted in February 2006 and which expires on 16th February 2018.

The site is not within a ‘sensitive area’ as defined in Schedule 2 to the EIA Regulations. It is not subject to any other ecological, landscape, historic or other constraints and it is not within an area identified as being at risk of flooding, or in a groundwater source protection zone.

The above table sets out, in detail, this authority’s conclusions in relation to the selection criteria in Schedule 3 to the EIA Regulations.

This is expanded upon in National Planning Practice Guidance: Environmental Impact Assessment (revised 28 July 2017) which seeks to assist local planning authorities in determining whether a project is likely to have significant environmental effects. This includes ‘Annex: indicative screening thresholds’ which states are *“indicative only and are intended to help determine whether significant effects are likely”*.

For part 2(e) – ‘surface installation for the extraction of oil/gas’ the indicative criteria and threshold are the “*development of a site of 10 hectares or more or where production is expected to be more than 100,000 tonnes of petroleum per year.*” Neither of these factors applies in this case, because the site does not exceed 10 hectares, nor produce more than 100,000 tonnes/year.

The ‘key issues to consider’ are identified as the “*scale of development, emissions to air, discharges to water, the risk of accident and the arrangements for transporting the fuel.*” In this case, no further physical development is proposed (including no further drilling), the development would be temporary, albeit for 10 years, and the site and operation is small in scale with. The site is well-screened on all sides by mature landscaping and bunding and, although located to the north of a PROW, is not prominent, with views only gained through the access gates to the site. The potential for impact on the landscape is therefore not considered significant. Emissions to air are controlled through the Environmental Permitting process, and the risk of accident controlled by the HSE. Minerals (oil) would be transported from the site, but there would be no increases in vehicle movements over the low level that has already been considered acceptable, particularly as the site is on the A29. Because the site has been in existence for a long period of time, there is the potential for cumulative impact. However, the operation is relatively low key, and impacts well contained so it is not considered that the cumulative impact over time would be significant.

Overall it is considered that the development is unlikely to result in significant environmental impact.

In reaching this conclusion, the controls provided through the existing planning permission (ref. BN/31/05) have been taken into account, along with those provided through Environmental Permitting and the HSE regimes have been taken into account.

Taking into account the low level scale/nature of the development, the controls in place through the planning and Environmental Permitting regulations, and through HSE, and the criteria in Schedule 3 of the EIA Regulations, it is considered that the proposal does not have the potential for significant environmental impact within the meaning of the EIA Regulations.

Screening Opinion

In the opinion of the Mineral Planning Authority, the development **would not require an Environmental Impact Assessment.**

Signed:

Reviewed by:

A handwritten signature in black ink, appearing to read 'C Bartlett'.A handwritten signature in black ink, appearing to read 'J Moseley'.

Chris Bartlett
Principal Planner

Jane Moseley
County Planning Team Leader

Date: 18 January 2018

Date: 22 January 2018