



**Town and Country Planning Act 1990 (As Amended)**

**Planning Statement in support of:**

**The proposed retention of the existing Storrington Wellsite and to continue to produce hydrocarbons for a further period of up to 5 years - (Variation of Condition 3 of planning permission SR/68/96)**

**at**

**Storrington Oilfield,**

**Storrington,**

**West Sussex.**

**By: Island Gas Ltd**

**Date: December 2012**

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**Planning statement accompanying planning application which seeks to retain the existing Storrington Wellsite and to continue to produce hydrocarbons for a further period of up to 5 years - (Variation of Condition 3 of planning permission SR/68/96)**

**Storrington Oilfield, Storrington, West Sussex.**

**December 2012**

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## Summary

A planning application is being made to West Sussex County Council by Star Energy Weald Basin Limited, part of the IGas Energy Group (the applicant) in relation to the wellsite known as Storrington, which is used to exploit the Storrington Oilfield. The application seeks variation of the current planning permission covering the wellsite in order to retain the existing infrastructure and equipment and enable continued hydrocarbon production operations at the wellsite for an additional temporary period up to 5 years.

The applicant wishes to seek a variation of the following condition:

- Condition 3 of Planning Permission SR/68/96

The proposal does not involve any new physical development, as the wellsite and production equipment are already in place. The application seeks to vary Condition 3 of in order to retain the development and extend the period of hydrocarbon recovery for a temporary period of 5 years. Ultimately, the wellsite will be restored as approved to agriculture.

The Storrington Wellsite lies on the eastern side of the A283 – Pulborough Road, to the north west of Storrington in West Sussex as shown on Location Plan STO 02.

Storrington Oilfield was first discovered in 1985 following exploration drilling. Since that time various operational changes have been undertaken to vary the equipment and production methods. Production at the oilfield commenced in the mid 1990's. Today production levels are diminished, but the field still produces a steady 80 barrels of oil per

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day (bopd). Whilst the quantities are small in relation to oil producing standards, they still make a useful contribution to onshore production in the UK and to an indigenous energy supply. It is considered worth retaining the wellsite and production for an additional 5 years to maximise recovery of reserves at the field.

This planning statement accompanies the application and seeks to demonstrate that the continuation of operations at the wellsite for a further temporary period would not harm local amenities or the environment and that the proposal reflects the principles of sustainable development.

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## **1.0 Introduction**

- 1.1 Storrington Oilfield is operated by Star Energy Weald Basin Limited, which is part of the IGas Energy Group (the applicant). IGas is a leading onshore hydrocarbon producer in the United Kingdom, delivering natural gas and crude oil to Britain's energy market. The company explores and develops gas and oil reserves at onshore locations in the northwest of England, in north Wales, in the East Midlands and in southern England. With almost a decade of experience in onshore drilling, IGas is able to exploit prolific and lower-cost hydrocarbon reserves which contribute to the UK's energy supply.
- 1.2 Storrington Oilfield is within Licence Area PL205. The Oilfield has been in production since the mid 1990s. (See location plan Figure STO 02 for location of wellsite). The Storrington Oilfield was discovered following the first exploration well which was drilled in 1985 by the then owners Conoco. Since that time there have been several phases of development with associated drilling of production wells, injection wells and workovers. Currently the site is producing oil 80 barrels of oil per day (bopd) which is stored on site in a series of tanks prior to being taken off site by road tanker. All the excess gas is flared.
- 1.3 The current planning permissions (described in Section 3.0 of this statement) which cover the operations and equipment require that operations cease and the wellsite be restored on 31<sup>st</sup> December 2012. Some of the permissions for additional equipment that were not implemented or installed and these permissions will be allowed to lapse. This application seeks to retain the wellsite, and current equipment and operations and vary Condition 3 of SR/68/96 and extend the lifetime of the wellsite and operations by 5 years until 31<sup>st</sup> December 2017 to maximise recovery of the final reserves of oil.



- 1.4 An application for variation is submitted with the appropriate forms, certificates and plans together with a copy of this statement.
- 1.5 This planning statement assesses the impact of retaining the infrastructure at the wellsite and continuing with the operations on the local community and environment for a further temporary period. It also weighs up the merits of the application in the context of National Planning Policy and the Development Plan.
- 1.6 This statement concludes that the operations have successfully be integrated into the local environment, and whilst the Storrington wellsite lies adjacent to the Parham Park SSSI and the South Downs National Park it is concluded that overall the development does not give rise to any significant environmental or amenity impacts and as such are in accordance with Development Plan policy and that planning permission should be granted to extend the lifetime of the permissions for a further 5 years.



## **2.0 Location and Site Descriptions**

- 2.1 Storrington Oilfield is located in the District of Horsham in the County of West Sussex. The Oilfield consists of one wellsite known as Storrington – see Figure 1. The wellsite is 2.81 ha and lies to the east of the A283 – Pulborough Road, to the north west of Storrington.
- 2.2 The Wellsite lies within land that forms part of the Parham Estate. It lies immediately to the west of the Parham Airfield and Storrington Gliding club and north east of the Parham Park. The land rolls gently downward from the site in a northerly and easterly direction, it is relatively flat in a westerly direction and to the south west the land rises towards Windmill Hill. The nearest densely populated village is Cootham which lies on the western outskirts of Storrington.
- 2.3 The site is accessed off the A283, via a bellmouth access. The access is shared with Charity Farm and Pulborough Rugby Football Club. There is no public access to the wellsite, although there is an agreement that when the wellsite is removed the access to Charity Farm will be retained. There are two footpaths in the environs of the wellsite. Footpath 2636 runs to the north of the wellsite from the access on the Pulborough Road in a north-easterly direction alongside Bog Common Cottages across the airfield and footpath 2637 runs to the south of the wellsite and to the north of Charity Farm also in a north-easterly direction across the airfield.
- 2.4 The site is relatively remote from residential properties in Cootham. The nearest properties are Charity Farm 70m to the south east of the Wellsite, Bog Common Cottages 320m to the north and Douglas Lodge 280m to the south west.





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- 2.5 The perimeter of the wellsite is secured by a 2m high mesh security fence. Inside this the wellsite compound is surrounded by a mixture of grassed earth bunds and planting. To the north, south and west of the bunds are narrow strips of grassland. Further west is a tall hedgerow which extends alongside the A283.
- 2.6 The layout of the Wellsite is shown in STO 01B. The wellsite consists of: a sealed platform, a fire water tank, a site office and small workshop, in the north of the site, a ground flare (approximately 7m high) in the south east of the site, a water injection pump, and a small processing plant consisting of gas separation, gas treatment skids and a crude oil heater. There are also 6 horizontal storage tanks for oil and water and a tanker loading area. The site has 3 wells with nodding donkeys and one re-injection well.
- 2.7 Storrington wellsite is adjacent to Parham Park, a medieval deer park, which forms part of the Parham Estate and is located on the western side A283 to the wellsite. Parham Park is designated as a Site of Special Scientific Interest (SSSI). The wellsite is also situated adjacent to the newly designated South Downs National Park, whose boundaries also run along the western side of A283.



### 3.0 Planning History

- 3.1 The Storrington Oilfield has been the subject of a number of separate planning permissions.
- 3.2 The planning history and current planning permissions for the oilfield are listed below:
- 3.3 **SR/1/94** – This permission was granted on 15 December 1994 for the retention and further development of the oilfield for production purposes. At that stage it was envisaged that the oil and gas would be produced together from the outset. The permission included provision for eight IMW gas engine generators to be installed.

*Condition 4 ““All buildings, plant, machinery, both fixed and otherwise, and any engineering works connected therewith on the application site (including any hard surface constructed for any purpose) shall be removed from the application site and the site shall be restored in accordance with condition (19) within 12 months from the completion of production or the 31<sup>st</sup> December 2010, whichever is the earlier. Notwithstanding this condition, any plant or equipment required to make the site safe to a specification agreed with the Department of Energy in accordance with the Petroleum (Production) Regulations 1976 may remain in position and those parts of the access works necessary to maintain the access to Charity Farm buildings as required by planning permission SR/39/92 may be retained for that purpose only.”*

- 3.4 The gas generators were not installed and the permission was extended by SR/68/96 below.

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3.5 **SR/68/96** – This permission sought to vary SR/1/94 to enable a revised phasing and method of working, which resulted in the scale of the onsite development being less than originally proposed and omit seven of the eight gas power generation sets that were previously required and approved. The revised operations also sought to retain the wellsite for a maximum of 15 years – until the end of 2012. The variation also involved the extraction of oil as the first phase of development, with the idea that in time permission may be sought to export the gas by pipeline. In the meantime permission was granted for the installation of a gas ground flare. Condition 3 of this permission requires:

*“All buildings, plant, machinery, both fixed and otherwise, and any engineering works connected therewith on the application site (including any hard surface constructed for any purpose) shall be removed from the application site and the site shall be restored in accordance with condition (19) within 12 months from the completion of production or the 31<sup>st</sup> December 2012, whichever is the earlier. Notwithstanding this condition, any plant or equipment required to make the site safe to a specification agreed with the Department of Energy in accordance with the Petroleum (Production) Regulations 1976 may remain in position and those parts of the access works necessary to maintain the access to Charity Farm buildings as required by planning permission SR/39/92 may be retained for that purpose only.”*

3.6 As part of this permission a deed of unilateral undertaking was obtained in which it was agreed that all drivers under their control or under the control of their agents or contractors will be issued with written instructions to observe the traffic routing described in the application and enter from and leave the site only in a westerly direction. It was also agreed that a local liaison panel would be established to maintain

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links between the applicant, local representatives and the Mineral Planning Authority throughout the course of the development.

3.7 In the end the 1MW gas engine generator was not installed, but this application is being varied to extend the life of the wellsite and retain the unilateral agreement that is connected to it.

3.8 **SR88/98** This permission was for the installation of an additional ground flare at Storrington. Condition 4 of this permission requires that;

*“The flare unit and any engineering works connected with the provision of the flare, shall within three months of the permanent cessation of the use of the equipment for the flaring of gas, or the 31<sup>st</sup> December 2012, whichever is the earlier, be removed from the site and the site thereof restored in accordance with a scheme submitted to and agreed in writing with the Mineral Planning Authority.”*

3.9 The flare has been removed and this permission is not being extended

3.10 **SR57/00** – This permission was to locate two gas turbine electrical generator units with an output of some 9.9MW. The scheme proposed to utilise the gas obtained which was being flared. Condition 3 of this permission requires all plant and equipment to be removed by 31 December 2012.

*“All structures, plant, machinery both fixed and otherwise and any engineering works connected therewith on the application site (including any hard surface constructed for any purpose) shall be removed from the application site and the site shall be restored in accordance with the requirements of planning permission SR89/96 (meant to be 68/96) within twelve months from either the cessation of oil production or the cessation of*

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*electricity generation utilising the plant hereby approved or the 31<sup>st</sup> December 2012  
whichever is the earlier”.*

3.11 The generators were not installed and this permission is not being renewed or extended.

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#### **4.0 The Proposal**

- 4.1 This planning statement accompanies an application to vary Condition 3 of Planning Permission reference SR/68/96, such that wellsite and equipment at Storrington wellsite is retained and the lifetime of the oilfield and operations is extended by 5 years until 31 December 2017.
- 4.2 The proposed variation does not involve any new physical development, as the wellsite and production equipment are already in place. Restoration of the wellsite will be to agriculture and in accordance with Condition 19 of SR/68/96.
- 4.3 Current production levels at the wellsite are approximately 80 bopd, which is taken off site in 1 to 2 tankers per week (2 to 4 movements).
- 4.4 Production facilities at Storrington consist of the wells being pumped by electricity driven beam pumps into stock tanks where the oil, gas and water content of the reservoir fluid are left to separate and settle out. The stock tanks are located within a bunded area with a suitable loading point for road tankers. The water is drawn from the bottom of the tank and stored in a produced water tank.

#### **Export of Oil and Transport Movements**

- 4.5 Once the stabilised oil is held in the storage tanks it is ready for export by road tankers. The oil is loaded into the tankers in a concrete loading area using the loading pump. Tankers then take the oil to the applicants export terminal at Holybourne near Alton, where it is transferred to rail tankers and taken to the Esso Refinery at Fawley.



4.6 As stated in Section 3, as part of Planning Permission reference SR/68/96, there is a unilateral agreement in place which means that all tankers enter or leave the site in a westerly direction. The Wellsite operates six days per week (Mondays to Saturdays inclusive).

4.7 Tankers travel between Storrington and Holybourne via the A283, A272, A3 and A31 only.

#### **Manning of Wellsite at Storrington Oilfield**

4.8 The Storrington oilfield is operated as a satellite of the Weald Basin operations. It is manned during the day and is controlled and supported by staff at Holybourne, which is manned 24 hours per day and provides all of the necessary manpower and technical backup.

#### **Other Facilities at the Wellsite**

4.9 A portacabin is located on each wellsite which provides offices and toilet facilities. In addition there is a small workshop unit used for minor equipment repairs.

4.10 The wellsite is powered by mains electricity to a switch unit located adjacent to the site portacabin.

4.11 A 45,000 gallon fire water tank is located at each Wellsite entrance for use in case of emergency. The wellsite compound has 2m high security fencing.

#### **Drainage/Pollution Control**



- 4.12 The oil production equipment including the water and oil storage tanks, loading/off loading pump and pipework, is located on an impermeable, wall bunded, concrete area to contain spills.
- 4.13 Water that is produced from the wells is put in a produced water storage tank. The water is re-injected back into the well using an injection pump. The site is complies with Environment Agency drainage and pollution control measures.
- 4.14 Waste water from the toilet and mess facilities are drained to a sealed cesspit. This is periodically emptied by suction tanker and removed to the local sewage works for treatment.

#### **Flaring of Gas**

- 4.15 Any gas produced is collected and flared.

#### **Restoration of the Oilfield**

- 4.16 Once all recoverable reserves of oil at this oilfield have been exhausted it is proposed to reinstate the land to agriculture and restore the wellsite. Restoration will involve sealing and abandonment of the wells, removal of all plant and equipment. Breaking up and removal of the concrete and stone site base and replacement of sub-soil and top soil in order to return the land to its previous condition



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## 5.0 The Development Plan

### Planning Policy Introduction

- 5.1 The overall operations at Storrington oilfield for planning permission were granted under reference SR/1/94 (15 December 1994). The life of production operations was extended under planning permission SR/68/96 until 31 December 2012, which also secured a unilateral routing agreement. This current application is seeking to retain the production operations at the Wellsite for up to an additional 5 year period as such it is necessary to re-assess whether there are any issues or impacts associated with the temporary applications that conflict with Development Plan policy.
- 5.2 The application is not considered to be Environmental Impact Assessment (EIA) Development.
- 5.3 It is a requirement of Section 38 of the Planning and Compulsory Purchase Act 2004 that where a Development Plan contains policies relevant to an application; the decision must be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.4 The Development Plan that these applications should be considered against include the Regional Spatial Strategy (RSS) – The South East Plan adopted May 2009, the saved policies of the Minerals Local Plan 2003, Horsham Core Strategy Development Plan – adopted in 2007. West Sussex County Council is going to produce jointly with the South Downs National Park Authority a Minerals Plan, but preparation of the joint plan has not yet started and therefore only the policies of the saved Minerals Local Plan are a

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consideration. In addition the National Planning Policy Framework (NPPF) and any other statements of Government policy must be taken into account.

5.5 The key considerations in relation to this proposal are considered to be: sustainable development and the balance between economy, environment and society; mineral development, the acceptability of the scheme at this location in relation to land-use and environmental policy designations i.e. the South Downs National Park and nearby SSSI designation; and its impact on the amenity of local residents and the surrounding community; its impact on the nature conservation value of the site and surroundings; its impact on landscape in terms of landscape character and visual impact; its impact on noise, air quality and hydrogeology; and finally the suitability of the site in relation to access to and from the highway and the impact of traffic generated.

5.6 These considerations will be discussed below in relation to government and planning policy.

### **National Planning Policy**

5.7 The key national policy with regards to this proposal is set out in the White Paper ‘Meeting the Energy Challenge’, published by the Government in May 2007, which sets out the UK’s international and domestic energy strategy. It recognises that whilst the UK’s reserves of oil and gas are declining and production has hit its peak and is now falling, that the UK must make the most of the reserves it has. In addition, an issue for the UK is security of supply, as the nation becomes more reliant on imports of fossil fuels, where such supplies can be interrupted by market conditions and international relations. As such, one of government’s aims in meeting this security of energy supply challenge is to maximise the economic production of our domestic energy sources. This includes the production of fossil fuels such and oil and gas:

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*“Fossil fuels will continue to play an essential role in our energy system for the foreseeable future”*

5.8 In paragraph 4.16 of the White Paper, the Government outlines the importance of regulatory environment in maximising recovery of our indigenous fossil fuels. It states

*“If we are to maximise economic recovery of remaining UK reserves we must maintain a supportive regulatory environment that attracts a wide range of companies to exploit existing and prospective fields.”*

5.9 This proposal to retain the production operations at Storrington will enable the recovery of in line with Government energy policy to maximise recovery of indigenous fossil fuels.

### **Annual Energy Statement 2012**

5.10 The Government produces an Annual Energy Statement which provides market direction and sets strategic energy policy. The 2012 Statement was published recently in November. Most relevant to this proposal were the statements that;

- *“Oil and gas are set to remain a vital part of our energy system for years to come. In this context the Government is committed to ensuring that we maximize the cost effective extraction of UK hydrocarbon resources – both offshore and onshore, consistent with safety and environmental protection” (para 2.63) “It is in the UK’s interests that as much as possible of our demand for oil and gas is met from indigenous supply...DECC therefore aims to maximise recovery of our indigenous supply. (para 2.64) (November 2012; Annual Energy Statement DECC)*

5.11 Whilst this application to extend the life of the Storrington oilfield is for a relatively small amount of hydrocarbon reserve, it nevertheless plays an important role, by helping to

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maximise energy recovery of indigenous supplies and by contributing to the energy sector economy and therefore is considered sustainable to retain the site and maximize recovery of a non-renewable resource.

### **National Planning Policy Framework (2012)**

5.12 On 27<sup>th</sup> March this year the Government published the National Planning Policy Framework (NPPF), which came into force immediately. In the NPPF the Government sets out its planning policies for England and how these are expected to be applied. As stated above, the NPPF is a material consideration in planning decisions, such as determining this application, and therefore the relevant parts in relation to this proposal are set out below. Previous guidance in the form of PPGs, MPGs and PPSs has been cancelled.

#### *Sustainable Development*

5.13 Achieving sustainable development is a key purpose of the planning system and at the heart of the NPPF is a presumption in favour of sustainable development (paragraph 14; NPPF March 2012). In relation to planning applications and decision taking the Government states that this means:

*“approving development proposals that accord with the development plan without delay”.*

5.14 There are various definitions of sustainable development. Resolution 24/187 of the United Nations General Assembly defined it as “meeting the needs of the present without compromising the ability of future generations to meet their own needs”, and the UK Sustainable Development Strategy “Securing the Future”, identified the following five principles of sustainable development; “living within the planets environmental limits; ensuring a strong, healthy and just society; achieving sustainable economy; promoting good governance; and using sound science responsibly”. The Government in the NPPF

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(paragraph 7) identifies three dimensions to sustainable development; an economic role, a social role and an environmental role.

- 5.15 This section of the planning statement sets how the proposal contributes towards sustainable development and accords with the Development Plan for the application site i.e. the saved policies of the West Sussex Minerals Plan 2003, the adopted Horsham Core Strategy Development Plan Document (DPD) 2007 and the relevant policies of the South East Plan 2009.

*Delivering Sustainable Development – Building a Strong and Competitive Economy*

- 5.16 In the NPPF the Government states that:

*“it is committed to securing economic growth in order to create jobs and prosperity, building on the country’s inherent strengths, and to meet the twin challenges of global competition and of a low carbon future”.*(paragraph 18; NPPF March 2012);

- 5.17 The West Sussex Minerals Local Plan (2003) recognises that oil and gas are produced in the County at Storrington and Singleton (paragraph 2.48; WSLP 2003).

*Delivering Sustainable Development – Meeting the Challenge of Climate Change and Flooding.*

- 5.18 The NPPF states in paragraph 103 that when determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere and should only consider development informed by a site specific flood risk assessment. The Wellsite is over a hectare in area, and although an existing site, the application is supported by a flood risk assessment contained in Appendix 3. It concludes that the site is at low risk of flooding and would not increase flood risk elsewhere, taking into consideration climate change issues.

*Delivering Sustainable Development – Conserving and Enhancing the Natural Environment.*

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5.19 The Government sets out in paragraph 109 of the NPPF that the planning system should contribute to and enhance the natural and local environment by:

- “- Protecting and enhancing valued landscapes, geological conservation interests and soils;*
- Recognising the wider benefits of ecosystem services;*
- Minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity;*
- Preventing new and existing development from contributing to or being put unacceptable risk from, or being adversely affected by unacceptable levels of soil, air or noise pollution;*  
*and*
- Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.” (Paragraph 109; NPPF March 2012)*

5.19 The site lies adjacent to Parham Park which is designated as a Site of Special Scientific Interest (SSSI), which is a national nature conservation designation. The boundary lies on the other side of the Pulborough Road from the wellsite.

5.20 The previous planning applications for this wellsite were supported by ecological assessments. The findings of these assessments were that the wellsite itself was of medium local conservation value and that the proposed development would have an impact of low local significance. It was concluded that overall in ecological terms the proposal would not result in any significant adverse effects on the SSSI.

5.21 The wellsite is small in scale and the operations contained within the compound itself. This proposal involves no physical development, just a continuation of existing production operations. The wellsite has been operating since the mid 1990s and it is considered that any extension of the lifetime of the wellsite for an additional 5 year

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period will not result in any significant adverse effects on the nature conservation value of the nearby SSSI.

5.22 In relation to environmental protection the NPPF goes on to say in paragraphs 115 and 116 that:

*“great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas. ...Planning permission should be refused in these designated areas except in exceptional circumstances and where it can be demonstrated that they are in the public interest. Consideration of such applications should include an assessment of:*

- *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 of the designated area, or meeting the need for it in some other way;*
- *Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”*

5.23 The wellsite is located adjacent to the newly designated South Downs National Park and therefore whilst the tests set out in the NPPF do not strictly apply, this application needs to consider whether the continued operation of the wellsite, for an additional 5 years, in such proximity to this national designation will result in any significant adverse impact. The following paragraphs consider national need, the possibility of developing it elsewhere or in another way and its impact on the environment, landscape and

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recreational character of the site and surrounding area. These issues are addressed below.

- 5.24 As already discussed, in this statement, the UK has relatively small, but nevertheless important onshore deposits of hydrocarbons in the form of oil and gas. Also, as stated earlier in this statement UK Government policy on energy is such that we should exploit indigenous supplies of fossil fuels as this helps the UK achieve a security of supply in volatile and competitive international markets.
- 5.25 The existing wellsite at Storrington and the extension of the life of the wellsite and operations provides the opportunity to recover the final reserves prior to the site being restored. If the reserve is not recovered now, when the wellsite is built and existing, any future attempt to exploit the reserve would be from the position of having to re-establish a wellsite in the vicinity, which would be economically and environmentally prohibitive. There are no viable economic, environmental or sustainable alternative options to producing the remaining oil reserve from the Storrington field from sites further away from the South Downs National Park.
- 5.26 Production has taken place at this wellsite since the mid 1990s, given that the wellsite and infrastructure exist there is little scope, to consider alternative sites, but instead to ensure that impacts arising from production continue to be minimal. The National Park is designated for its national landscape value and recreational importance. The wellsite lies on the other side of the Pulborough Road from the National Park boundary, which acts as a clear break between the designated landscape and the countryside beyond. The existing wellsite is relatively small and well screened from the designated land and public view by the surrounding bunds and planting. The wellsite is hidden from distant



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views from within the designated land and can only be glimpsed from close up along the access to Charity Farm and the Pulborough Road.

- 5.27 Production at the wellsite is declining and therefore visual impacts associated with operations such as HGV vehicles leaving the site are also slowing reducing too. The proposal does not require any new works outside of the wellsite compound and all plant and infrastructure would be screened by the surrounding bunds and mature planting and sits predominately below the tree line.
- 5.28 Any adverse visual and landscape character impacts on the National Park and local countryside have been mitigated by existing planting and bunding. A Landscape and Visual Impact Assessment was prepared by Nicholas Pearson Associates for the planning application SR/68/96 for the Wellsite. The assessment concluded that the proposal would have a negligible impact on the Sussex Downs AONB, although at this stage the South Downs National Park had not be designated, the boundary of the former AONB and National Park coincide.
- 5.29 The proposal to extend the lifetime of the Wellsite by 5 years involves no new plant and equipment and it is considered that the continued production is a low key activity which will have minimal adverse impact on the character of the immediate area and landscape beyond.
- 5.30 Overall it is concluded that the oil is a nationally important mineral and that its production for a limited additional period of 5 years in this location is sustainable and in the national interest. Any adverse visual and landscape impacts from Storrington Wellsite are localised to the immediate vicinity of the site itself and all other adverse impacts beyond are considered to be minimal and negligible. The continued production operations at wellsite will have minimal short term landscape character and visual

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impacts on the South Downs National Park. In addition the operations and the site are temporary and will be restored to agriculture.

5.31 Finally in relation to “*Conserving and Protecting the Natural Environment*” the NPPF states:

*“Planning policies and decisions should aim to: avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development; mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through use of conditions; recognise that development will often create some noise and identify and protect areas of tranquility which have remained relatively undisturbed by noise and are prized for their recreational and amenity value”.*  
(Paragraph 123; NPPF March 2012)

5.32 The Storrington Wellsite is located in the countryside on a site where background noise levels are low. A noise assessment was prepared and submitted as part of the planning application for SR/68/96 and Condition 6 of this permission required a noise monitoring scheme to be undertaken, submitted and approved by the mineral planning authority. Such a scheme was submitted and approved. In addition Condition 8 of permission SR/68/96 requires that “*all equipment used at any stage of the development of the site or for the production of oil and gas or the generation of electricity shall at all times be silenced to a standard such that the maximum noise levels from the on-site operations measured at the facades of any residential property liable to receive increased noise levels due to onsite operations do not exceed 45dB(A) Laeq/1hr during the periods in which well drilling operations are being carried out and 35dB(A)/1hr at all other times. The noise levels shall be measured in accordance with DoE Guidance MPG11 and British Standard 7445. If so required by the Mineral Planning Authority tests shall be carried out by the operator in order to demonstrate that that the equipment*

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*conforms to the above mentioned standards and, in the event that it does not, all use of that equipment shall cease until measures have been taken to silence it to an acceptable standard. “*

- 5.33 The production operations at the wellsite create little noise. The site contains a small amount of process plant consisting of a gas separation and gas treatment skid and a crude oil heater. The site is relatively remote from residential properties.
- 5.34 The nearest properties are Douglas Lodge and Charity Farm which are to the south and south west of the site respectively at distances of approximately 300m to 350m. The site is screened on the south, north and east sides of the hardstanding area with grass covered earth bunds. On the eastern side of the site the earth bund is approximately 4.5m high and this increases to 8m along the site’s southern boundary. Along the eastern half of the northern boundary the bund is approximately 3.5m high and this slopes downwards in a westerly direction towards the site entrance. The southern bund shields Douglas Lodge and Charity Farm. The most exposed properties are Bog Common Cottages which lie immediately adjacent to the A283, about 400m from the southern end of the hardstanding of the site. The site operates within the current approved noise limits and would continue to do so if an extension of time is permitted.
- 5.35 The NPPF (paragraph 109) also seeks to ensure that new development does not contribute to unacceptable impacts or pollution risks to soil, air or water. The existing wellsite is sealed by an impermeable membrane to ensure that the soil and water environment below and surrounding the site is protected and the site complies with Environment Agency pollution control measures.

*Delivering Sustainable Development – Facilitating the Sustainable Use of Minerals*



5.36 The NPPF recognises in paragraph 142 that minerals are essential to support sustainable economic growth. They can only be worked where they are found and it is important to make the best use of them to secure their long term conservation. Policy on determining minerals planning applications is set out in paragraph 144 of the NPPF. It states 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 the locality;*
- Ensure that any unavoidable noise, dust or particle emissions 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” (paragraph 144; NPPF March 2012)*

5.37 In addition to the NPPF, Technical Guidance has been produced on flood risk and minerals. Paragraph 20 of the Technical Guidance reminds MPAs that proposal should not have an unacceptable adverse effect on the natural or historic environment or human health. This application is supported by a flood risk assessment and the impacts on the natural environment and human health are discussed in this section. The wellsite is existing and so it is not considered that there will be any adverse impacts on the historic environment.

5.38 Overall it is considered that the application does not conflict with the Government’s approach to sustainable development as set out in the NPPF, given that the production



site is a temporary minerals operation and that the site will be restored to agriculture. This minerals production is needed to support the government's energy policy in maximizing the potential of indigenous fossil fuels and that any adverse impacts on the environment and local amenity can be minimized through appropriate mitigation.

### **Local Development Plan Policy**

5.39 The paragraphs below consider this planning application in relation to local planning policies set out in the following development plans:

- *Sussex Minerals Local Plan 2003*
- *Policies of the Horsham Core Strategy DPD 2007*

*NB. Some of the issues have been set out above in relation to NPPF policy and so are not covered in such detail.*

5.40 **Policy I** –Sustainable Mineral Working in Sussex – Sussex County Council as the Minerals Planning Authority (MPA) states that it is committed to sustainable development and will only permit mineral workings which have the least Environmental harm and opportunities to conserve and enhance the environment are incorporated into the proposed restoration scheme. This proposal seeks to maximize recovery of oil from an existing reserve before the site is restored. It is considered sustainable to allow recovery of the reserve for an additional 5 years before the land is restored to its original state as agricultural land.

5.41 **Policy I2** - Protecting the Environment. In this policy the MPA states that some minerals working may be accommodated within the AONB. 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 possible.” This wellsite is adjacent to the newly designated National Park. Mitigation measures were put in place at the time of constructing the wellsite to minimise adverse impacts beyond the immediate site. The existing wellsite is well screened and the small scale nature of the proposals means that any adverse impacts are localised and will not adversely impact the overall character of the National Park. Whilst this proposal seeks to delay final restoration by 5 years, it is considered that the small scale of the site and the final restoration to agriculture do not conflict with the purposes of this policy.

- 5.42 **Policy 26** – Oil and Gas states that applications for commercial development of oil and 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 alternative sites and that the proposal is acceptable in relation to the surrounding area in terms of countryside resources, access and routing of HGVs, protection of nearby residents and amenities from the effects of operations, safeguarding of rights of way and safeguarding of water supplies and the water environment.
- 5.43 **Policies 47, 48, 53, 55, and 56** of the West Sussex Mineral Local Plan seek to protect environmental resources and control the working practices of mineral sites and it is considered that the continued operation of the Storrington Wellsite complies with the requirements and criteria of these policies. In relation to highways and access issues, the access to the Wellsite is able to accommodate the low levels of traffic generated at the oilfield. The production rate of oil at Storrington is up to 80 tonnes per day, which results in one tanker at the site per day – this has minimum adverse impact on local roads. The agreed route entering and leaving the wellsite will continue to apply and the level of traffic movements will continue to decrease as production falls away.



5.44 **Policies 20 and 21** of the Sussex Minerals Local Plan seek to ensure that mineral working is only permitted where the mineral authority is satisfied that the site can be restored in a manner appropriate for the location and at the earliest opportunity. Originally it was thought that reserves at Storrington would have ceased by now, but the wellsite is still producing a steady 80bopd. In line with Government Policy it is proposed to continue production for an additional 5 years, by which time it is expected that the reserve will be diminished. Following this the wellsite will be restored as approved to agriculture.

5.45 In relation to the adopted policies of the Horsham Core Strategy 2007, Policy CPI – Landscape and Townscape Character and Policy CP2 – Environmental Quality are considered to be the most applicable to this proposal. Overall it is considered that extending the lifetime of the Wellsite for an additional 5 years will not conflict with the aims or purposes of these policies which seek to protect the National Park and environmental resources and amenities of the district.

#### **Regional Spatial Strategy – The South East Plan (May 2009)**

5.46 In May 2009 the South East Plan was adopted but it is the intention of the current Government to remove regional plans, but until an Order is made to abolish them under the Localism Act, for the time being it is considered that they still form part of the Development Plan and as such are a material consideration for this proposal.

5.47 There are no specific planning policies on hydrocarbons within the adopted plan, but there are policies on sustainable development (CC1), strategic flood risk management (NRM4), the South Downs National Park (Policies C2), conservation and improvement of biodiversity (NRM5), (NRM9) noise (NRM10), and landscape and countryside

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management (C4) which are relevant to this application. The proposal is considered to accord with the principles and criteria of these regional policies and the relevant issues are discussed and addressed above in relation to national policy guidance and other development plan policies.



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## **6.0 Conclusion**

- 6.1 Production and previously exploration and appraisal activities have taken place at Storrington since the mid-1990s. The activities are temporary and although production of oil from the Storrington reservoir has lasted longer than originally predicted, the site has been continuously controlled by West Sussex County Council through temporary planning permissions.
- 6.2 The Wellsite is well established and integrated into the local environment and as such it gives rise to no significant impacts on the environment or local amenity – impacts are minimal and controlled through conditions. As such it is requested that planning permission is extended at the Wellsite for an additional 5 years period to maximise oil reserves in the interests of sustainable development.

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**Appendix I – Planning Application Forms, Certificates and Plans**

**MINERALS AND ASSOCIATED WASTE APPLICATIONS – APPLICATION FORM**

<b>1. Applicant Details</b> (See guidance note 1)	<b>2. Agent Details</b> Please complete if the applicant has an agent (See guidance note 2)
* Title: MRS * Forename: H * Surname: HUDSON	* Title: MRS * Forename: H * Surname: HUDSON
Company Name: IGAS ENERGY LTD.	Company Name:
Flat Name/No: * Property Name/No: 23 BUCKHAM HOUSE * Street: LENTEN STREET Locality: Town/City: ALTON * Postal Town: ALTON County: HANTS * Postcode: GU34 1HH	Flat Name/No: * Property Name/No: * Street: SEE APPLICANT Locality: DETAILS. Town/City: * Postal Town: County: * Postcode:
* Telephone: 0803 3264014 Mobile: 07702 314652 Fax: * Email: Helen.Hudson@igaspk.com	* Telephone: Mobile: Fax: * Email:

**3. Description of Proposed Development \***  
 Max 1000 characters (See guidance note 3)

VARIATION OF CONDITION 3 OF PLANNING PERMISSION SR/68/96 TO AUTHORISE AN EXTENSION OF TIME FOR THE PRODUCTION OF HYDROCARBONS AT STARRINGTON WELLSITE, EAST OF THE A283, COOTHAM, NR STARRINGTON UNTIL INCLUDING THE RETENTION OF ALL EXISTING PLANT AND EQUIPMENT

**4. Site Address** *Please enter Site Location PLUS other site address details (See guidance note 4)*

Site Location: **STORKINGTON DILFIELD.**  
 Max 90 characters

Flat Name/No:

\* Property Name/No: **STORKINGTON WELLSITE**  
 Street:

Locality: **EAST OF A283**

Town:

\* Postal Town: **COOTHAM**

County: **W SUSSEX.**  
 Postcode:

\* Telephone:

Mobile:

Fax:

\* Email:

**5. Application Site** *(See guidance note 5)*

(i) Present use(s) of the site:  
 Max 200 characters **WELLSITE**

(ii) Total application area (as outlined in red on your plans) in Hectares: **2.81** Ha

**Roads and Rights of Way**  
*If Yes to any question(s), please show details on your plans / drawings and state the reference of the plans / drawings at Section 9*

\* (iii) Is a new or altered vehicle access proposed to or from the public highway? **Yes / No**

\* (iv) Is a new or altered pedestrian access proposed to or from the public highway? **Yes / No**

\* (v) Are there any new public roads to be provided within the site? **Yes / No**

\* (vi) Are there any new public rights of way to be provided within or adjacent to the site? **Yes / No**

\* (vii) Do the proposals require any diversions, extinguishments or creating of Rights of Way? **Yes / No**

**6. Site Ownership** *(See guidance note 6)*

*Please note: You will be required to complete an ownership certificate and submit it with the application*

\* (i) Surface land owner(s): Name: **PARHAM ESTATE**  
 Address: **C/O SAVILLS, HAYWARDS HEATH RH16 3BN**

(ii) Mineral owner(s) if Name: **ICAS ENERGY LIMITED**  
 different from (i) above Address: **BUCKHAM HOUSE 23 LENTEN STREET ALTON.**

\* (iii) Is the applicant the sole owner of the site? **Yes / No**

\* (iv) Does the applicant own/control any adjoining land? *(If yes, outline in blue on the plan)* **Yes / No**

**7. Type of Application** (See guidance note 7)

Is the application for:

- (a) Planning permission for mineral extraction on a site? Yes / ~~No~~
- (b) Planning permission for development involving the storage, treatment / recycling or disposal of mineral waste? ~~Yes~~ / No
- (c) Renewal of unimplemented permission? ~~Yes~~ / No  
*If yes, give date and reference number of unimplemented permission in the 'Other Details' section below*
- (d) Planning permission for mineral exploration? ~~Yes~~ / No
- (e) Planning permission for new ancillary and associated development? ~~Yes~~ / No
- (f) Renewal of temporary permission? (where development has been implemented) Yes / ~~No~~  
*If yes, give date and reference number of temporary permission in the 'Other Details' section below* SR/68/96
- (g) Extension to an existing mineral working? Yes / No  
*If yes, give date and reference number of existing permission in the 'Other Details' section below*
- (h) Variation of condition(s)? Yes/~~No~~  
*If yes, give date and reference number of existing permission and the condition(s) sought to be amended in the 'Other Details' section below*
- (i) Review of Old Mineral Permissions (ROMP)? Yes / No
- (j) Planning permission to consolidate existing permissions (including associated development on the site) ~~Yes~~ / No

Other Details:

VARIATION OF CONDITION 3 OF SR/68 / 96

**8. Minerals Extraction** (See guidance note 8)

(a) Type of minerals:

PRODUCTION OF HYDROCARBONS - OIL AND GAS.

(b) Quantity (in tonnes):

80 BARRELS OF OIL PER DAY

(c) Area of mineral extraction in Hectares:

2.81 Ha

(d) Period for which permission is sought:

years

(e) Maximum depth of working in metres AOD (Above Ordnance Datum):

— m AOD

(f) Depth of winter water table in metres AOD:

— m AOD

(g) How will the mineral be extracted?

Surface extraction: Yes / ~~No~~

Underground mining: Yes / No

PUMPED.  
Drilling: ~~Yes~~ / No

**9. Plans, Drawings and Other Supporting Material** (See guidance note 9)

(i) List her the plans and drawings submitted with the application. (See guidance notes for the drawings that are required or would be advisable)

Reference No.		Title	PLANNING STATEMENT DEC 2012
Reference No.	STO 01B	Title	SITE PLAN
Reference No.	STO 02	Title	LOCATION PLAN
Reference No.		Title	

Other Details of any other uploaded plans:

(ii) Is an Environmental Statement attached with this application?

Yes / No

If yes, provide address where copies of the Environmental Statement can be purchased and its price.

(iii) Is a Design & Access Statement attached? Required for all applications involving buildings. Yes / No

**10. Assessment of Flood Risk**

Is this site within an area at risk of flooding?

Yes / ~~No~~

*Refer to the Environment Agency's Flood Map showing flood zones 2 and 3, and consult Environment Agency standing advice and you local planning authority for information as necessary*

requirements

*If yes, you will need to submit a Flood Risk Assessment before your application can be determined. Your local planning authority should make clear on its website what the Flood Risk Assessment should cover*

Is your proposal within 20 metres of a watercourse (eg river, stream or beck)?

Yes / No

Will the proposal increase the flood risk elsewhere?

~~Yes~~ / No / Unknown

How will surface water be disposed of?

- Sustainable drainage system
- Soakaway
- Main sewer
- Existing watercourse
- Pond / lake

Yes / ~~No~~

~~Yes~~ / No

~~Yes~~ / No

~~Yes~~ / No

~~Yes~~ / No

**11. Biodiversity and Geological Conservation**

Is there a reasonable likelihood of the following being affected adversely or conserved and enhanced within the application site, OR on land adjacent to or near the application site:

Protected and priority species: (See guidance note)

- i) Yes, on the development site
- ii) Yes, on land adjacent to or near the proposed development
- iii) No

No

Designated sites, important habitats or other biodiversity features:

- i) Yes, on the development site
- ii) Yes, on land adjacent to or near the proposed development
- iii) No

No

Features of geological conservation importance:

- i) Yes, on the development site
- ii) Yes, on land adjacent to or near the proposed development
- iii) No

No

**12. Voluntary Agreements / Planning Obligations** (See guidance note 10)

Are any draft agreements included with the application?

Yes / No

If yes, summarise the purpose of the agreement below

THERE IS AN EXISTING UNILATERAL AGREEMENT REGARDING  
ROUTING.

Are there any existing Section 106 agreements affecting the site?

SEE  
APPENDIX 2.

Yes / No

**13. Supplementary Information**

Indicate the supplementary information which you have completed and will submit with this application form: *Note: All applicants must complete sections G, H & I*

- |   |                     |
|---|---------------------|
| A: Mineral Extraction   | Completed: Yes / No |
| B: Mineral Processing   | Completed: Yes / No |
| C: Underground Mining   | Completed: Yes / No |
| D: Proposals involving Disposal of Mine and Quarry Wastes       | Completed: Yes / No |
| E: Mineral Exploration  | Completed: Yes / No |
| F: Oil and Gas Development                                      | Completed: Yes / No |
| * G: Ancillary Operations, Associated Development and Transport | Completed: Yes / No |
| * H: Environmental Effects of Development                       | Completed: Yes / No |
| * I: Restoration, Aftercare and After-use                       | Completed: Yes / No |
| J: Benefits of the Development                                  | Completed: Yes / No |

The estimated fee for this application is: £

The correct fee for this application is: £

**For Official Use Only**

Validated by:

Date:

**Declaration** I (we) hereby apply for planning permission or consent as described in this form and the accompanying plans, drawings and additional information.

\* Applicant: IRAS ENERGY LTD.

Agent: 

\* Date: 19 DECEMBER 2019.



**CERTIFICATE OF OWNERSHIP B**

**TOWN & COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)  
ORDER 2010 CERTIFICATE UNDER ARTICLE 12**

**I certify that**


1. The requisite notice has been sent to all owners of any part of the land to which the application relates 21 days before the date of this application.

* Name and Address of Owner	* Date Notice Served
1. PARHAM ESTATE.	11 DEC 2012
2. C/O SAVILLS	
3. HAYWARDS HEATH.	
4.	
5.	
6.	

**Notice under Article 11 of the Town & Country Planning (Development Management Procedure) Order 2010**

* Proposed development at (Address or location of proposed development)	STORKINGTON WELLSITE, STORKINGTON WEST SUSSEX.
* Take notice that an application is being made by (Name of applicant)	ICAS ENERGY LTD.
* For planning permission to (Description of proposed development)	RETENTION OF STORKINGTON WELLSITE FOR THE PRODUCTION OF HYDROCARBONS FOR UP TO AN ADDITIONAL 5 YEARS UNTIL 31 DEC 2017 (VARIATION OF CONDITION 3 OF PLANNING PERMISSION SK/86/96

Signed: \* Applicant ICAS ENERGY LTD

Agent 

\* Date: 11 DEC 2012

Note: An asterisk ( \* ) denotes those parts of the form which MUST be completed

**AGRICULTURAL HOLDING CERTIFICATE E**

**TOWN & COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)  
ORDER 2010 CERTIFICATE UNDER ARTICLE 12**

**I certify that**

\* None of the land to which the application relates is, or is part of, an agricultural holding.

\* The land to which the application relates is, or is part of, an agricultural holding.

*Tick the box to confirm one of the two lines above as appropriate*

1. No person other than the applicant was the owner of any part of the land to which the application relates at the beginning of the period 21 days before the date of the accompanying application.

Signed: \* Applicant

IGAS ENERGY LTD

Agent

*[Signature]*

\* Date:

12 DEC 2012

## MINERALS AND ASSOCIATED WASTE APPLICATIONS

### SUPPLEMENTARY INFORMATION F – OIL AND GAS DEVELOPMENT

#### Nature of Proposals:

For **EXPLORATION**, complete sections 1, 4 and 5

For **APPRAISAL**, complete sections 2, 4 and 5

For **PRODUCTION**, complete sections 3, 4 and 5

	Information Provided	Document / Section / Page No.
<b>1) EXPLORATION</b>		
i) Area of Exploration:	Y/N <input checked="" type="checkbox"/>	Ref. <input type="text"/>
ii) Methods used including route of survey:	Y/N <input checked="" type="checkbox"/>	Ref. <input type="text"/>
iii) Effects of blasting:	Y/N <input checked="" type="checkbox"/>	Ref. <input type="text"/>
iv) Criteria used and number of boreholes:	Y/N <input checked="" type="checkbox"/>	Ref. <input type="text"/>
v) Duration of Operations:	Y/N <input checked="" type="checkbox"/>	Ref. <input type="text"/>

Additional information not provided elsewhere:

#### 2) APPRAISAL

i) Equipment and methods used:	Y/N <input checked="" type="checkbox"/>	Ref. <input type="text"/>
ii) Location of boreholes and site area:	Y/N <input checked="" type="checkbox"/>	Ref. <input type="text"/>

Additional information not provided elsewhere:

	Information Provided	Document / Section / Page No.
<b>3) PRODUCTION</b>		
i) Site area:	Y/N <input checked="" type="checkbox"/>	Ref. SECTION 2 PAGE 7
ii) Equipment used:	Y/N <input checked="" type="checkbox"/>	Ref. SECTION 2 P8
iii) Volumes extracted:	Y/N <input checked="" type="checkbox"/>	Ref. SECTION 4 P13
iv) Nature and location of processing plant:	Y/N <input checked="" type="checkbox"/>	Ref. SECTION 2 P8.
v) Method of transport to processing plant:	Y/N <input checked="" type="checkbox"/>	Ref. SECTION 4 P14

Additional information not provided elsewhere:

**4) SPECIFIC EFFECTS OF PROPOSALS**

i) Proposal details:	Y/N <input checked="" type="checkbox"/>	Ref. SECTION 5
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Additional information not provided elsewhere:

**5) SPECIFIC RESTORATION PROPOSALS**

i) Proposal details:	Y/N <input checked="" type="checkbox"/>	Ref. SECTION 4 P13 + SECTION 4 P15.
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Additional information not provided elsewhere:

RESTORATION OF THE WELLSITE TO BE TO AGRICULTURE IN ACCORDANCE WITH CONDITION 19 OF SK/68/96

**MINERALS AND ASSOCIATED WASTE APPLICATIONS**

**SUPPLEMENTARY INFORMATION G (MANDATORY) – ANCILLARY OPERATIONS, ASSOCIATED DEVELOPMENT AND TRANSPORT**

	Information Provided	Document / Section / Page No.
i) Details of buildings, plant, machinery and structures associated with the winning or working of minerals or deposit of waste(s) subject of this application:	Y/N <input checked="" type="checkbox"/>	Ref. SECTION 2 AND SECTION 4
ii) Site access:	Y/N <input checked="" type="checkbox"/>	Ref. PARA 2.3
iii) Methods of transporting materials off site:	Y/N <input checked="" type="checkbox"/>	Ref. SECTION 4 4.5-4.7
iv) Details of vehicular movements:	Y/N <input checked="" type="checkbox"/>	Ref. SECTION 4. 4.5-4.7.
v) Have you submitted a travel assessment?	Y/N <input type="checkbox"/>	Ref. —
vi) Have you submitted a travel plan? Y/N	<input type="checkbox"/>	Ref. —

Additional information not provided elsewhere:

**MINERALS AND ASSOCIATED WASTE APPLICATIONS**

**SUPPLEMENTARY INFORMATION H (MANDATORY) – ENVIRONMENTAL EFFECTS OF DEVELOPMENT**

	Information Provided	Document / Section / Page No.
i) Days and Hours of working:	Y/N <input checked="" type="checkbox"/>	Ref. <input type="text"/>
ii) Noise issues:	Y/N <input checked="" type="checkbox"/>	Ref. SECTION 5. 5.31 – 5.35
iii) Dust:	Y/N <input type="checkbox"/>	Ref. <input type="text"/>
iv) Method to prevent deposit of mud on highways:	Y/N <input type="checkbox"/>	Ref. <input type="text"/>
v) Blasting:	Y/N <input type="checkbox"/>	Ref. <input type="text"/>
vi) Hazardous material:	Y/N <input type="checkbox"/>	Ref. <input type="text"/>
vii) Hydrology issues:	Y/N <input checked="" type="checkbox"/>	Ref. APPENDIX 3 + SECTION 5 S. 18
viii) Land stability:	Y/N <input type="checkbox"/>	Ref. <input type="text"/>
ix) Processes to be registered:	Y/N <input type="checkbox"/>	Ref. <input type="text"/>
x) Statutory and non statutory designations:	Y/N <input checked="" type="checkbox"/>	Ref. SECTION 9 + SECTION 5
xi) Height and position of all temporary stock piling:	Y/N <input type="checkbox"/>	Ref. <input type="text"/>
xii) Visual impact of proposal:	Y/N <input checked="" type="checkbox"/>	Ref. SECTION 5.
xiii) Landscaping during operations:	Y/N <input checked="" type="checkbox"/>	Ref. SECTION 2 2.5 + SECTION 5
xv) Protected species, habitats and bio-diversity:	Y/N <input checked="" type="checkbox"/>	Ref. SECTION 5.
xvi) Archaeology:	Y/N <input type="checkbox"/>	Ref. <input type="text"/>

Additional information not provided elsewhere:

**MINERALS AND ASSOCIATED WASTE APPLICATIONS**

**SUPPLEMENTARY INFORMATION I (MANDATORY) – RESTORATION, AFTERCARE AND AFTERUSE**

	Information Provided	Document / Section / Page No.
i) Scheme submitted:	Y/N <input checked="" type="checkbox"/> N	Ref. AS PERMITTED
ii) Progressive scheme:	Y/N <input checked="" type="checkbox"/> N	Ref. —
iii) Details of restoration, aftercare and after-use:	Y/N <input type="checkbox"/>	Ref. AS PERMITTED.
iv) Use of soil materials:	Y/N <input checked="" type="checkbox"/> N	Ref. —
v) Methods and machinery to be used for restoration:	Y/N <input checked="" type="checkbox"/> N	Ref. —
vi) Arrangements for longer term management of restored site:	Y/N <input checked="" type="checkbox"/> N	Ref. —
vii) Access arrangements for restored site:	Y/N <input checked="" type="checkbox"/> N	Ref. —

Additional information not provided elsewhere:

THE SITE WILL BE RESTORED TO AGRICULTURE AS PERMITTED.  
 IN ACCORDANCE WITH CONDITION 19 OF SR/68/96.

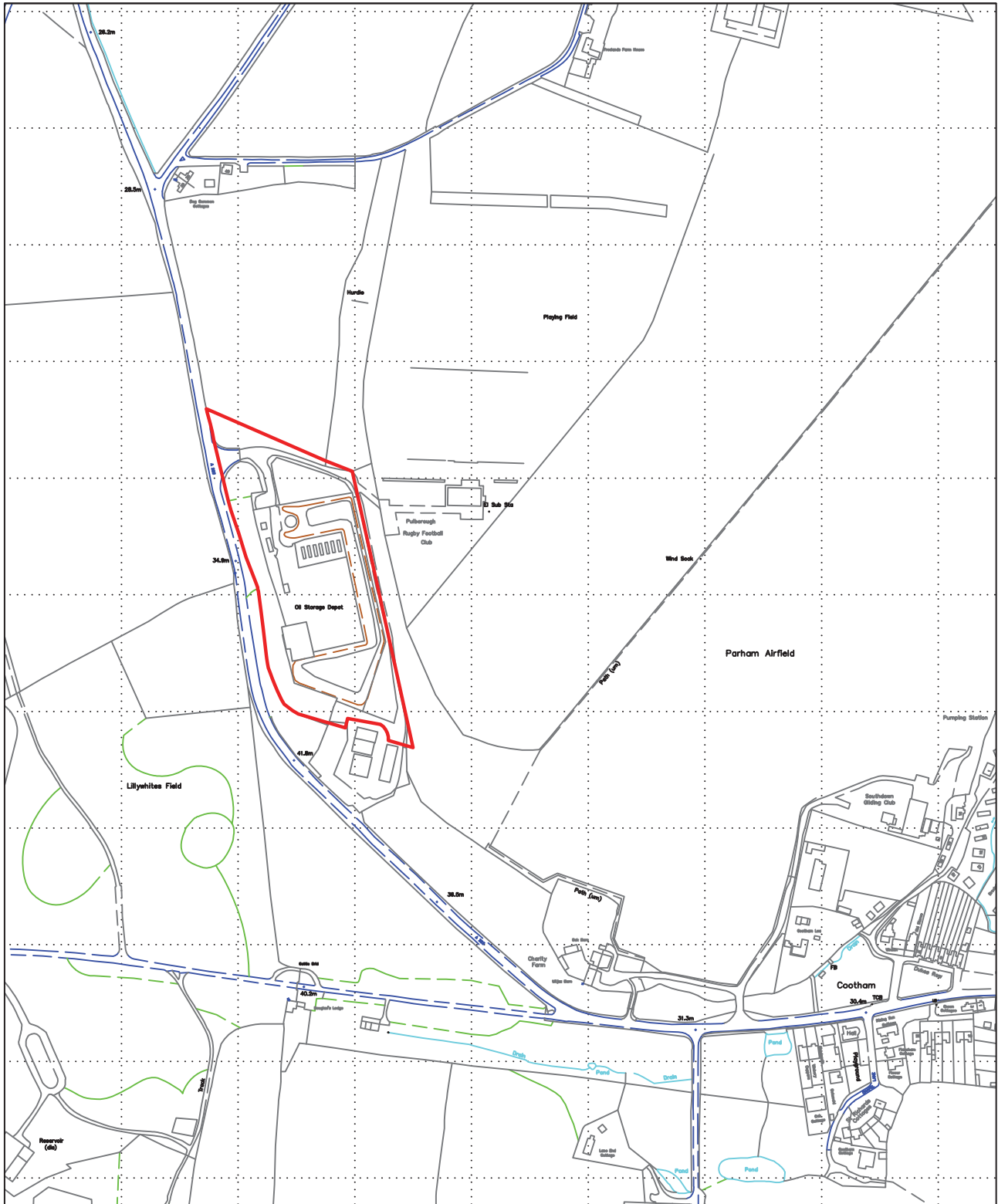
## MINERALS AND ASSOCIATED WASTE APPLICATIONS

### SUPPLEMENTARY INFORMATION J – BENEFITS OF THE DEVELOPMENT

	Information Provided	Document / Section / Page No.
i) Employment:	Y/N <input type="checkbox"/> N	Ref. <input type="text" value="—"/>
ii) Commercial benefits to the Operator:	Y/N <input type="checkbox"/> N	Ref. <input type="text" value="—"/>
iii) Meeting policy requirements /need:	Y/N <input type="checkbox"/> Y	Ref. <input type="text" value="Section 5"/>
iv) Other benefits:	Y/N <input type="checkbox"/> N	Ref. <input type="text" value="—"/>

Additional information not provided elsewhere:





NOTES:

STORRINGTON WELL SITE  
LOCATION PLAN

SCALE: 1:5,000 @ A4

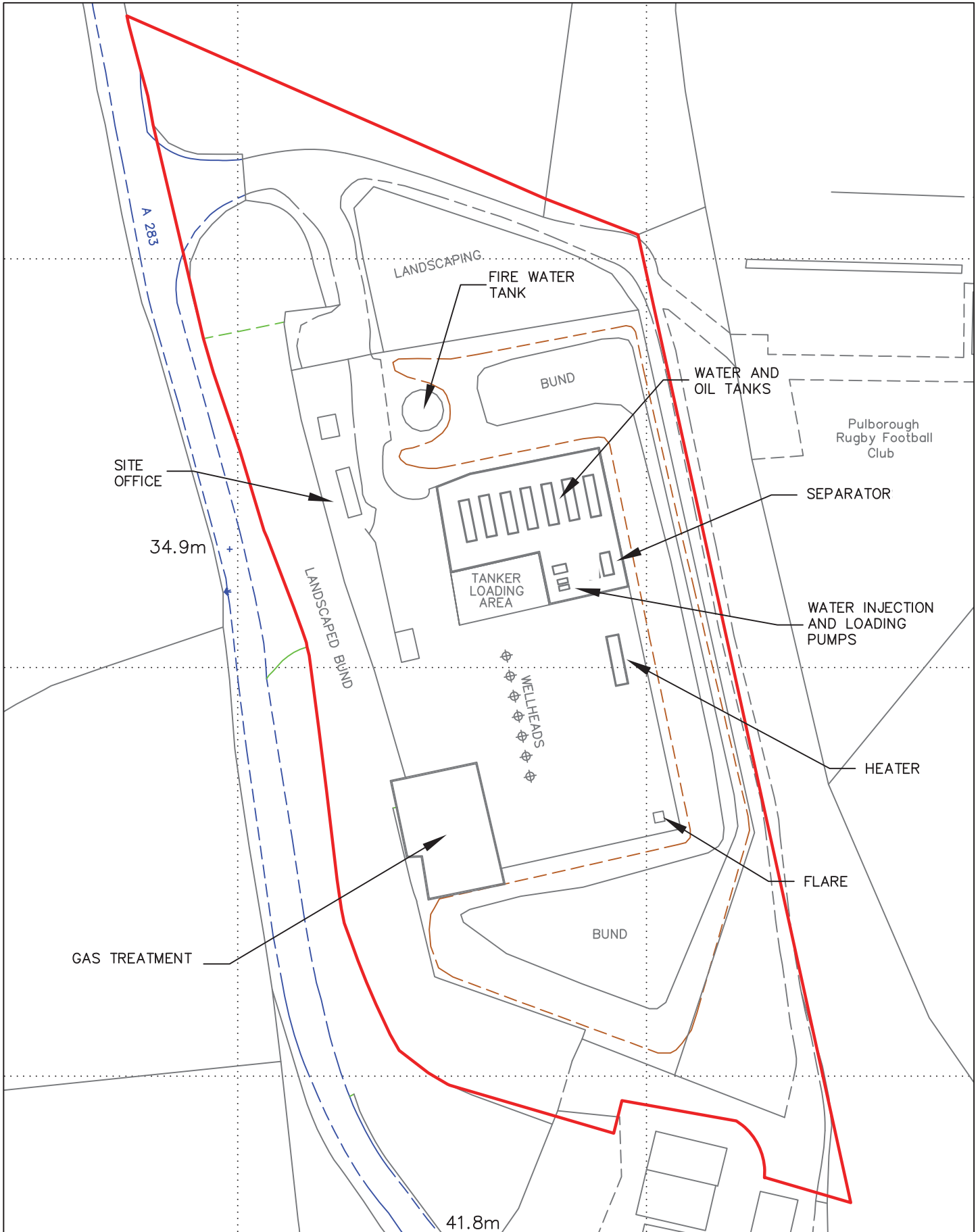
NGR: TQ 068 149

DATE: 13th Nov 2012

REF: STO-02

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NOTES:

STORRINGTON WELL SITE SITE PLAN	
SCALE: 1:1,250 @ A4	NGR: TQ 068 149
DATE: 13th Nov 2012	REF: STO-01B
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 <p><b>IGas</b> Energy</p>	<p><b>Storrington Wellsite</b></p>	<p>Page   34</p>
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**Appendix 2 – Decision Notice**



Application No. SR/68/96  
County Matter Application

**TOWN AND COUNTRY PLANNING ACT 1990**  
**TOWN AND COUNTRY PLANNING (GENERAL DEVELOPMENT PROCEDURE)**  
**ORDER 1995**

To .....Cairn Energy Onshore Limited.....  
.....c/o Austin Adams.....  
.....10 Cumberland Place.....  
.....Southampton, SO15 2BH.....

In pursuance of their powers under the above-mentioned Act and Orders, the Council hereby notify you that they **PERMIT** the following development, that is to say:-


Variation of condition 3 of planning permission SR/1/94 to authorise the development of the site to an amended design and the production of oil and gas to an amended phasing of operation. Storrington Oilwell Site, East of A283, Cootham, near Storrington.



to be carried out in accordance with your application and plans (as modified by the undermentioned conditions if any) submitted to this Council on 14th October 1996

(and in accordance with the relevant correspondence a copy of which is attached\*) and subject to compliance with the conditions specified hereunder:-

- (a) A deed of undertaking being obtained from the applicant that all drivers under their control or under the control of their agents or contactors will be issued with written instructions to observe the traffic routeing described in the application and enter from and leave the site only in a westerly direction.
- (b) A local liaison panel being established by the applicant to maintain links between the applicant, local representatives and the Mineral Planning Authority throughout the course of the development.
- (c) The following conditions:-

Date ..... - 8 APR 1997 ..... Signed  Continued .....  
County Secretary .....

N.B. The reasons for imposing the above conditions as specified after the conditions.  
\* The words in brackets do not apply unless a copy of the relevant correspondence is attached.  
Your copy of the application, determined as above, is returned herewith for your records.

**IT IS IMPORTANT THAT YOU SHOULD READ THE NOTES ON THE BACK OF THIS FORM**

**CONTINUATION SHEET**

- (1) The development for which permission is hereby granted must begin not later than the expiration of two years beginning with the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990.

- (2) The development hereby permitted shall be carried out and completed in all respects strictly in accordance with the submitted documents and plans, as varied by the terms of the conditions of this permission.

Reason: To secure a satisfactory development in the interests of the amenities of the locality.

- (3) All buildings, plant, machinery, both fixed and otherwise, and any engineering works connected therewith on the application site (including any hard surface constructed for any purpose) shall be removed from the application site and the site shall be restored in accordance with condition (19) within twelve months from the completion of production or the 31st December 2012, whichever is the earlier. Notwithstanding this condition, any plant or equipment required to make the site safe to a specification agreed with the Department of Energy in accordance with the Petroleum (Production) Regulations 1976 may remain in position and those parts of the access works necessary to maintain the access to Charity Farm buildings as required by planning permission SR/39/92 may be retained for that purpose only.

Reason: To secure the satisfactory restoration of the site.

- (4) Notwithstanding the diagrammatic layouts of plant and equipment shown on the plans submitted with the application hereby approved no items of plant, equipment or buildings to be erected or placed on the site pursuant to this permission shall be commissioned or used unless and until the written agreement of the Mineral Planning Authority has been given to the positioning, layout, design, colour and dimensions of the plant, equipment and buildings.

Reason: In the interests of the visual amenities of the locality.

Continued ....

Date ..... - 8 APR 1997

Signed ..... 

**CONTINUATION SHEET**

- (5) With the exception of temporary drilling equipment no plant, equipment or buildings shall be erected or placed on the site the height of which exceeds six metres above the drilling platform or site ground level at the position of the plant, equipment or building.

Reason: In the interests of the visual amenities of the locality.

- (6) No work of site development, drilling or production shall take place during the lifetime of the site unless and until a scheme of noise monitoring to be undertaken by or on behalf of the operator has been submitted to and approved in writing by the Mineral Planning Authority and such scheme as approved fully implemented and maintained. Such scheme shall specify the periods, locations and standards of the monitoring and be related to and appropriate to the development in progress at specific times. The scheme, as approved, shall only be modified or varied with the written agreement of the Mineral Planning Authority prior to the modification or variation being made.

Reason: To secure the monitoring of noise levels emanating from the site in the interests of the amenities of the locality.

- (7) No work of well drilling, work-over or completion of wells shall be undertaken on the site unless and until the details of the rig and equipment to be used and the period of such use has been notified to and approved in writing by the Mineral Planning Authority. Thereafter all such works shall be carried out in complete accordance with the approved details. All drilling and well servicing equipment shall be acoustically screened to limit as far as is practicable the tonal and impulsive character of all noise emissions within the limitations set by condition 8 of this permission.

Reason: In the interests of the amenities of the locality.

- (8) All equipment used at any stage of the development of the site or for the production of oil and gas or the generation of electricity shall at all times be silenced to a standard such that the maximum noise levels from the on-site operations measured at the facades of any residential property liable to receive increased noise levels due to the on-site operations do not exceed 45dB(A) Laeq/1hr during the periods in which well

Continued ....

Date ..... - 8 APR 1997

Signed  .....

drilling operations are being carried out and 35dB(A) Laeq/1hr at all other times. The noise levels shall be measured in accordance with DoE Guidance MPG 11 (April 1993) and British Standard 7445. If so required by the Mineral Planning Authority tests shall be carried out by the operator in order to demonstrate that the equipment conforms to the above mentioned standards and, in the event that it does not, all use of that equipment shall cease until measures have been taken to silence it to an acceptable standard.

Reason: In the interests of the amenities of the locality.

- (9) The Company shall use its best endeavours not to withdraw and replace during well drilling operations the drilling string or set casing or place cement in the borehole between the hours of 2200 and 0700 other than in the case of emergency.

Reason: In the interests of the amenities of residents in the locality.

- (10) Site preparation, construction and restoration works including the delivery of materials and maintenance of plant shall be carried out only between the hours of 0700 and 1800 on weekdays or 0700 and 1300 on Saturdays, and shall not be carried out at any time on Sundays or public holidays. No mobile or temporary plant or equipment shall be used on the site unless equipped with adequate silencers made to a standard not less than the equipment manufacturers standard UK specification which shall be maintained in efficient working order at all times.

Reason: In the interests of the amenities of the locality.

- (11) Other than through the equipment described in the application no gas flaring or venting shall be carried out at the site unless the details of procedures and methods to be used have been submitted to and approved in writing by the Mineral Planning Authority in advance. Such approval and the conditions attached thereto shall be deemed to be incorporated into this permission as though set out in this notice.

Reason: In the interests of the amenities of the locality.

- (12) Fire precautions and fire fighting equipment shall be provided and maintained at the site throughout the operations hereby authorised in accordance with the requirements of the Mineral Planning Authority.

- 8 APR 1997

Date .....

Signed .....

**CONTINUATION SHEET**

Reason: In the interests of safety.

- (13) Except in the case of emergency, no heavy goods vehicles shall enter or leave the site except between the hours of 0700 to 1800 on any day.

Reason: In the interests of the amenities of the locality.

- (14) At no time during the production periods of operation on the site shall more than eleven heavy goods vehicles loaded with produced oil depart from the site during any one day unless otherwise agreed in writing by the Mineral Planning Authority in advance of any change in operations.

Reason: In the interests of the amenities of the locality.

- (15) No floodlighting or lighting fitment shall be operated on the site (other than essential drilling rig safety lighting), such that the light source is directly visible from any residential property in the vicinity of the site or from the public highway A283.

Reason: In the interests of the amenity of this countryside location and for highway safety.

- (16) No tank, container or other receptacle placed on the site in order to contain oil, fuel or any other potentially polluting fluid shall be used unless it is surrounded by a bund or overspill catchment capable of containing 110% of the volume of the storage unit.

Reason: To avoid pollution of watercourses or the aquifer.

- (17) No liquid waste or trade effluent shall be discharged from the site.

Reason: To avoid pollution of watercourses or the aquifer.

- (18) Provision shall be made within the site to prevent water, mud or earth being carried or discharged onto the public highway and if required by the Mineral Planning Authority facilities for vehicle wheel cleaning shall be installed.

Reason: In the interests of highway safety.

Continued ....

Date ..... - 8 APR 1997

Signed  .....



**CONTINUATION SHEET**

- (19) The whole of the application site shall be restored to its former levels and condition and the drilling site area prepared to a condition suitable for the re-establishment of agriculture to the satisfaction of the Mineral Planning Authority.

Reason: To secure the restoration of the site at the conclusion of production.

- (20) Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (or any amendment or re-enactment thereof) the written permission of the Mineral Planning Authority shall be obtained for the use of materials imported to the land for use in connection with the development hereby approved for any purpose on the land after restoration of the site.

Reason: To secure the restoration of the site to an acceptable after use.

- (21) (i) Within three months of the cessation of production of oil and gas from the site a scheme for the aftercare of the restoration of the site shall be submitted to the Mineral Planning Authority for approval showing the steps to be undertaken to ensure the satisfactory restoration of the site for agricultural or forestry purposes, over a five year period following the initial restoration of the site.

(ii) The scheme of aftercare, when approved in writing by the Mineral Planning Authority, shall be implemented as approved.

(iii) Where the Mineral Planning Authority, after consultation with the Ministry of Agriculture, Fisheries and Food agree in writing with the person or persons responsible for undertaking the aftercare steps that there shall be lesser steps, or a different timing between the steps, the aftercare shall be carried out in accordance with that agreement.

Reason: To secure the restoration of the site to a satisfactory standard.

Continued ....

8 APR 1997

Date .....

Signed .....

**CONTINUATION SHEET**

- (22) Notwithstanding the terms of condition 2 within six months of the date of this permission a detailed scheme of planting and landscape measures shall be submitted to the Mineral Planning Authority for approval and shall, when approved in writing by the Mineral Planning Authority, be carried out and planted in the next available planting season and thereafter maintained in good health throughout the course of the development hereby approved, in accordance with such measures for maintenance as may be agreed in the said scheme.

Reason: To ensure the satisfactory landscaping of the site.

- (23) At intervals not exceeding 12 months from the date of this permission or at such other times as may be agreed in writing with the Mineral Planning Authority, a review of the previous year's working, restoration, landscaping and aftercare shall be carried out in conjunction with a representative of the Mineral Planning Authority. The review shall take account of any departure from the approved operational scheme. Where appropriate, revised schemes providing for the taking of such steps as may be necessary to continue the satisfactory restoration, landscaping and aftercare of the site including the replacement of any tree or shrub which may have died, been removed or become seriously damaged or diseased shall be submitted to the Mineral Planning Authority for approval in writing. Thereafter all such works shall be carried out in accordance with the approved schemes.

Reason: In the interests of minimising the effects of the development on the locality.

- (24) A copy of this decision notice, approved plans and the submitted supporting information provided with the application shall be kept at the site office at all times and the terms and contents thereof made known to supervising staff on the site.

Reason: To ensure the satisfactory conduct of the development in the interests of the amenities of the locality.

PL12E/E17/AMB/MM

- 8 APR 1997

Date .....

Signed  .....



CAIRN ENERGY ONSHORE LIMITED

1 Stable Court, Herriard Park, Herriard, Nr. Basingstoke RG25 2PL Fax 01256 381122 Tel 01256 381888

Our Ref: RTM.666/LP

1 April 1997

County Planning Officer  
Planning Department  
West Sussex County Council  
County Hall  
Chichester  
West Sussex

For the attention of Mr Brian Johnson

Dear Sirs,

STORRINGTON

Please find enclosed Deed of Undertaking relating to the traffic routing agreement for the proposed Storrington oilfield.

Yours faithfully,  
CAIRN ENERGY ONSHORE LIMITED

A handwritten signature in black ink, appearing to read "R T McKie", written in a cursive style.

R T McKie  
COMMERCIAL AND LAND DIRECTOR

enc.

## DEED OF UNDERTAKING

In respect of the routing of heavy goods vehicles to and from the Storrington oil production site, Cootham, Storrington (hereinafter referred to as 'the site') which is proposed to be used for the production of oil and gas under the terms of County Matter Planning Application SR/68/96.

To: West Sussex County Council  
County Hall  
Chichester  
West Sussex

We, Cairn Energy Onshore Limited ('the Company') of Humble Grove Oil field, Weston Common  
The Avenue, Lasham, Nr. Alton, Hants GU34 5SY who are the applicants and intended operators of the above development, hereby undertake as follows:-

- (i) to ensure that all drivers of heavy goods vehicles under our control or under the control of our agents or contractors approach the site on the A283 road from Pulborough and on leaving the site turn right and proceed via Pulborough onto the road network as shown on the plan attached;
- (ii) to ensure that all drivers of heavy goods vehicles under our control or under the control of our agents or contractors are issued with written instructions to observe the traffic routing to the site as set out in (i) above;
- (iii) to erect and thereafter maintain in good condition a clearly legible notice to be prominently displayed at all times on the site such that it is readily visible to the drivers of departing heavy goods vehicles indicating the routing set out in (i) above;
- (iv) to vary the routing set out in (i) above only in respect of the movement of exceptional load movements in accordance with the directions of the police and highways authorities.

IN WITNESS whereof the Company has duly executed this document as its deed on the 1st day of April 1997.

Signed as a deed by Carl T. McKie  
for and on behalf of Cairn Energy Onshore Limited

in the presence of Linda Pinner

 <p><b>IGas</b> Energy</p>	<p><b>Storrington Wellsite</b></p>	<p>Page   35</p>
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**Appendix 3 – Flood Risk Assessment**



## NPPF: Flood Risk Assessment

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Storrington Wellsite, Cootham

**iGas PLC**

SHF.311.003.R.001.A



## Contact Details:

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## Storrington Wellsite, Cootham

Project:	NPPF: Flood Risk Assessment
For:	iGas PLC
Status:	Draft
Date:	November 2012
Author:	Keelan Serjeant, BSc (Hons), MSc - Principal Hydrologist
Reviewer:	Matt Travis, BSc (Hons), MSc, MCIWEM, C.WEM, CEnv, CSci - Director

### Disclaimer:

This report has been produced by Enzygo Limited within the terms of the contract with the client and taking account of the resources devoted to it by agreement with the client.

We disclaim any responsibility to the client and others in respect of any matters outside the scope of the above.

This report is confidential to the client and we accept no responsibility of whatsoever nature to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at their own risk.

Enzygo Limited Registered in England No. 6525159  
Registered Office Stag House Chipping Wotton-Under-Edge Gloucestershire GL12 7AD

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## 1.0 Introduction

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### 1.1 Background

- 1.1.1. At the request of iGas Plc, a Flood Risk Assessment (FRA) has been undertaken, in accordance with the National Planning Policy Framework (NPPF)<sup>1</sup> and the Technical Guidance to the NPPF<sup>2</sup>, for an extension of time of working for the production of oil and gas at Storrington Oilfield until 31 December 2017 (see Drawing 1). This has included an assessment of the surface water drainage requirements of the site.
- 1.1.2. This report details the flood risk at the site and how this could be managed and mitigated in support of the enclosed planning application for a change of use development. The proposed scale of development may present risks of flooding on-site and/or off-site if flooding is not effectively managed.
- 1.1.3. It is recognised that developments that are designed without regard to flood risk may endanger lives, damage property, cause disruption to the wider community, damage the environment, be difficult to insure and require additional expense on remedial works. Current guidance on development and flood risk<sup>3</sup> identifies several key aims for a development to ensure that it is sustainable in flood risk terms. These aims are as follows:
- the development should not be at a significant risk of flooding and should not be susceptible to damage due to flooding;
  - the development should not be exposed to flood risk such that the health, safety and welfare of the users of the development, or the population elsewhere, is threatened;
  - normal operation of the development should not be susceptible to disruption as a result of flooding;
  - safe access to and from the development should be possible during flood events;
  - the development should not increase flood risk elsewhere;
  - the development should not prevent safe maintenance of watercourses or maintenance and operation of flood defences;
  - the development should not be associated with an onerous or difficult operation and maintenance regime to manage flood risk. The responsibility for any operation and maintenance required should be clearly defined;
  - future users of the development should be made aware of any flood risk issues relating to the development;
  - the development design should be such that future users will not have difficulty obtaining insurance or mortgage finance, or in selling all or part of the development, as a result of flood risk issues;
  - the development should not lead to degradation of the environment; and
  - the development should meet all of the above criteria for its entire lifetime, including consideration of the potential effects of climate change.

---

<sup>1</sup> Department for Communities and Local Government (2012) National Planning Policy Framework.

<sup>2</sup> Department for Communities and Local Government (2012) Technical Guidance to the National Planning Policy Framework.

<sup>3</sup> CIRIA (2004) Funders report CP/102 Development and Flood Risk – Guidance for the Construction Industry.

1.1.4. The FRA is undertaken with due consideration of these sustainability aims.

1.1.5. The key objectives of the FRA are:

- To assess the flood risk to the proposed development and to demonstrate the feasibility of appropriately designing the development such that any residual flood risk to the development and its users would be acceptable;
- To assess the potential impact of the proposed development on flood risk elsewhere and to demonstrate the feasibility of appropriately designing the development such that the development would not increase flood risk elsewhere; and
- To satisfy the requirements of national planning policy guidance which require FRAs to be submitted in support of planning applications.

## **1.2 Project Scope**

1.2.1 In order to achieve the aims outlined above, a staged approach has been adopted in undertaking this FRA, in accordance with current best practice. A screening study has initially been undertaken to identify whether there are any potential sources of flooding at the site, which may warrant further consideration. Any potential flooding issues identified in the screening study have subsequently been considered in a scoping study. The aim of the scoping study is to review all available information and provide a qualitative assessment of the flood risk to the site and the impact of the site on flood risk elsewhere.

## **1.3 Report Structure**

1.3.1 This FRA has the following report structure:

- Section 2 identifies the sources of information that have been consulted during the FRA;
- Section 3 describes the application area including the existing and proposed development;
- Section 4 outlines the flood risk to the existing and proposed development;
- Section 5 assesses the potential impacts of the proposed development on surface water;
- Section 6 provides details of the Sequential and Exception Tests; and
- Section 7 presents a summary and conclusions.

## 2.0 Sources of Information

---

### 2.1 Sources of Information

- 2.1.1 General information regarding the site setting and hydrology of the application site has been obtained from the OS Explorer Map 134: Crawley & Horsham.
- 2.1.2 Information regarding the current flood risk at the application site, local flood defences and flood water levels has been obtained from the Environment Agency (see Appendix 1).
- 2.1.3 A location plan is shown on Drawing 1.

### 2.2 Discussion with Regulators

- 2.2.1 A wide range of regulators should be consulted when carrying out an FRA. These include the Environment Agency, the Local Planning Authority (LPA), and Water Regulators. Consultation and discussions with the relevant regulators have been undertaken during this FRA.

### 2.3 Environment Agency

- 2.3.1 The Flood and Water Management Act 2010 gives the Environment Agency a strategic overview role for all forms of flooding and coastal erosion. They also have direct responsibility for the prevention, mitigation and remediation of flood damage for main rivers and coastal areas. The Environment Agency is the statutory consultee with regards to flood risk and planning.
- 2.3.2 Environment Agency Standing Advice and the NPPF has been consulted and reviewed during this FRA.
- 2.3.3 A response has been received from Helen Tier Sustainable Places Planning Advisor at the Environment Agency for this area (see Appendix 1).

### 2.4 Local Planning Authorities

- 2.4.1 Planning guidance written by West Sussex County Council and Horsham District Council regarding flood risk was consulted to assess the mitigation policies in place. These documents include the evidence base for the Local Development Framework and the Local Plan.
- 2.4.2 Other documentation consulted included the Strategic Flood Risk Assessment (SFRA) of West Sussex and the Horsham District Council SFRA which cover the site.

### 2.5 Southern Water

- 2.5.1 Southern Water is responsible for the disposal of waste water and supply of clean water within this area.
- 2.5.2 Information with regards to sewer and water main flooding contained within the SFRA of West Sussex and the Horsham District Council SFRA has been consulted as part of this FRA. All Water Companies have a statutory obligation to maintain a register of properties/areas which are at risk of flooding from the public sewerage system, and this is shown on the DG5 Flood Register.

## **3.0 Description of Application Area**

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### **3.1 Site Location**

- 3.1.1 The site is located to the east of the A283, on the western edge of Parham Airfield (see Drawing 1).
- 3.1.2 The National Grid Reference of the site is TQ 06875, 14900.

### **3.2 Existing Development**

- 3.2.1 The site is currently an operational wellsite.

### **3.3 Proposed Development**

- 3.3.1 It is understood that the proposals are for an extension of time of working for the production of oil and gas at the Storrington Oilfield until the 31<sup>st</sup> December 2017
- 3.3.2 Further details with regard to the proposed development can be found in the accompanying information submitted with the planning application.

### **3.4 Topographic Information**

- 3.4.1 The site has a ground level of approximately 42mAOD.

### **3.5 Catchment Hydrology**

- 3.5.1 The River Rother is located approximately 1.3km to the northwest of the site, and the River Arun is located some 2km to the west (see Drawings 1 and 2). No other surface watercourses are evident either on, or within the vicinity of the site.

## 4.0 Flood Risk

### 4.1 Potential Sources of Flooding – Level 1 Screening Study

- 4.1.1 All potential sources of flooding must be considered for any proposed development. A summary of the potential sources of flooding and a review of the potential risk posed by each source at the application site is presented in Table 4.1.

**Table 4.1: Potential Risk Posed by Flooding Sources**

Flooding Source	Potential Flood Risk at Application Site?	Potential Source	Data Sources
Fluvial flooding	No	River Rother/River Arun	Environment Agency
Tidal flooding	No	None Identified	Environment Agency
Flooding from rising / high groundwater	Yes	Aquifer	BGS Map
Overland flow flooding	Yes	Poor permeability	RMS Map
Flooding from artificial drainage systems	Yes	Sewers	Southern Water, SFRA
Flooding due to infrastructure failure	No	None Identified	OS Map

#### Fluvial Flooding Sources

- 4.1.2 The River Rother is located approximately 1.3km to the northwest of the site, and the River Arun is located some 2km to the west (see Drawings 1 and 2). Due to the distance and topography between the site and the Rivers Rother and Arun the site is not at risk from these sources.
- 4.1.3 No other surface watercourses are evident either on, or within the vicinity of the site which pose a flood risk to the site. Therefore, this source of flooding has not been considered further within this FRA.

#### Tidal Flooding Sources

- 4.1.4 Due to the distance from the sea tidal flooding has not been considered further in this report. Therefore, this source of flooding has not been considered further within this FRA.

#### Flooding from rising / high groundwater

- 4.1.5 The Environment Agency has designated the bedrock as a Secondary A - permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers. These are generally aquifers formerly classified as minor aquifers;
- 4.1.6 The superficial deposits are designated as a Secondary Undifferentiated aquifer - has been assigned in cases where it has not been possible to attribute either category A or B to a rock type. In most cases, this means that the layer in question has previously been designated as

both minor and non-aquifer in different locations due to the variable characteristics of the rock type.

- 4.1.7 The BGS Groundwater Flooding Susceptibility Map shows that the north west corner of site has a moderate to moderately high susceptibility to flooding from rising / high groundwater (see Drawing 3).
- 4.1.8 The BGS data set is a hazard data set, not a risk data set, meaning that it does not provide any information about the likelihood of a groundwater flooding event occurring. It is noted that the BGS flood map is to be used as a screening tool, and should not be used to inform planning decisions.
- 4.1.9 Groundwater flooding tends to occur sporadically in both location and time. When groundwater flooding does occur, it tends to mostly affect low-lying areas, below surface infrastructure and buildings (for example, tunnels, basements and car parks) underlain by permeable rocks (aquifers).
- 4.1.10 As no below surface infrastructure and buildings are proposed for the site, as such the site is not considered at risk of flooding from rising / high groundwater.

#### Overland flow flooding

- 4.1.11 The site is not situated near to large areas of poor permeability or areas with the geology and/or topography which may result in overland flow flooding. Overland land flow flooding tends to occur sporadically in both location and time.
- 4.1.12 The Risk Management Solutions (RMS) overland flow flood map shows that the north west corner of the site is located within the 1 in 1000 year overland flow flood zones (see Drawing 4).
- 4.1.13 Therefore, the site has a low risk of overland flow flooding.

#### Flooding from Artificial Drainage Systems/Infrastructure Failure

- 4.1.14 Sewer flooding occurs when urban drainage networks become overwhelmed and maximum capacity is reached. This can occur if there is a blockage in the network causing water to back up behind it or if the sheer volume of water draining into the system is too great to be handled. This type of flooding tends to occur sporadically in both location and time.
- 4.1.15 Information with regards to sewer and water main flooding contained within the SFRA of West Sussex and the Horsham District Council SFRA has been consulted as part of this FRA.
- 4.1.16 The majority of sewers are built to the guidelines within Sewers for Adoption<sup>4</sup>. These sewers have a design standard to the 1 in 30 year flood event and therefore it is likely that the majority of sewer systems will surcharge during rainstorm events with a return period greater than 30 years (e.g. 100 years).
- 4.1.17 Therefore, a low level of flood risk is posed by this source of flooding.

---

<sup>4</sup> WRC (2006) Sewers for Adoption 6<sup>th</sup> Edition.

## 4.2 Environment Agency Flood Map

- 4.2.1 A review of the Environment Agency's flood map indicates that the site has a 'low probability' of flooding as the site is located within Flood Zone 1 with less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1%) (see Drawing 5).
- 4.2.2 The Flood Zones are the current best information on the extent of the extremes of flooding from rivers or the sea that would occur without the presence of flood defences, because these can be breached, overtopped and may not be in existence for the lifetime of the development.
- 4.2.3 The Environment Agency Flood Zones and acceptable development types are explained in Table 4.3.
- 4.2.4 In the Technical Guidance to the NPPF (Table 1) appropriate uses have been identified for the Flood Zones. Applying the Flood Risk Vulnerability Classification in Table 2 and 3 of the Technical Guidance to the NPPF, the proposed development is classified as 'less vulnerable'.
- 4.2.5 Table 4.4 of this report and Table 3 of the Technical Guidance to the NPPF state that 'less vulnerable' uses are appropriate within Flood Zone 3 after the completion of a satisfactory FRA.

**Table 4.3: Environment Agency Flood Zones and Appropriate Land Use**

Flood Zone	Probability	Explanation	Appropriate Land use
Zone 1	Low	Less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1%)	All development types generally acceptable
Zone 2	Medium	Between a 1 in 100 and 1 in 1000 annual probability of river flooding (1% - 0.1%) or between a 1 in 200 and 1 in 1000 annual probability of sea flooding (0.5% 0.1%) in any year	Most development type are generally acceptable
Zone 3a	High	A 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year	Some development types not acceptable
Zone 3b	'Functional Floodplain'	Land where water has to be flow or be stored in times of flood. SFRAs should identify this zone (land which would flood with an annual probability of 1 in 20 (5%) or greater in any year or is designed to flood in an extreme (0.1% flood, or at another probability to be agreed between the LPA and the Environment Agency, including water conveyance routes)	Some development types not acceptable

**Note:**

*The Flood Zones are the current best information on the extent of the extreme flood from rivers or the sea that would occur without the presence of flood defences, because these can be breached, overtopped and may not be in existence for the lifetime of the development.*



**Table 4.4: Flood Risk Vulnerability and Flood Zone ‘Compatibility’ as identified in Table 3 of the Technical Guidance to the NPPF**

Flood Risk Vulnerability classification (see Table 1 of the Technical Guidance to the NPPF)	Essential Infrastructure	Water Compatible	Highly Vulnerable	More Vulnerable	Less Vulnerable
Zone 1	Yes	Yes	Yes	Yes	Yes
Zone 2	Yes	Yes	Exception test required	Yes	Yes
Zone 3a	Exception test required	Yes	No	Exception test required	Yes
Zone 3b ‘Functional Floodplain’	Exception test required	Yes	No	No	No

**Key:**

*Yes: Development is appropriate, No: Development should not be permitted.*

### 4.3 Historic Flooding

- 4.3.1 Drawing 6 shows that the site has not been historically prone to flooding based upon observations of the types of geological deposits present.
- 4.3.2 The British Hydrological Society “Chronology of British Hydrological Event<sup>5</sup>” has no records of flooding in the immediate area. No other historical records of flooding for the site have been recorded.

### 4.4 Existing and Planned Flood Defence Measures

- 4.4.1 The Environment Agency flood map confirmed that the site is not protected by flood defence measures.

### 4.5 Current Flood Risk

- 4.5.1 The site is not at risk from fluvial and/or tidal flooding sources.
- 4.5.2 A number of secondary flooding sources have been identified in the Level 1 Screening Study which may pose a low risk to the site. These are:
- Flooding from rising / high groundwater
  - Overland flow flooding
  - Flooding from Artificial Drainage Systems/Infrastructure Failure
- 4.5.3 The secondary flooding sources, are isolated to the north western corner of the site and will only inundate the site to a relatively low water depth and water velocity, will only last a

<sup>5</sup> <http://www.dundee.ac.uk/geography/cbhe/>

short period of time, in very extreme cases and will not have an impact on the whole of the proposed development site.

- 4.5.4 As noted in Section 4.2, the entire site has a 'low probability' of flooding as the site is located within Flood Zone 1 with less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1%).
- 4.5.5 The proposed development is classified as 'less vulnerable', 'less vulnerable' uses are appropriate within Flood Zone 1 after the completion of a satisfactory FRA.

## 5.0 Site Drainage

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### 5.1 Surface Water Drainage

- 5.11 It is recognised that consideration of flood issues should not be confined to the floodplain. The alteration of natural surface water flow patterns through developments can lead to problems elsewhere in the catchment, particularly flooding downstream. For example, replacing vegetated areas with roofs, roads and other paved areas can increase both the total and the peak flow of surface water runoff from the development site. Changes of land use on previously developed land can also have significant downstream impacts where the existing drainage system may not have sufficient capacity for the additional drainage. This section considers the existing drainage system at the application site and potential impacts resulting from the development.
- 5.12 A surface water management strategy for the development will be required to manage and reduce the flood risk posed by the surface water runoff from the site. The developer will be required to ensure that any scheme for surface water should build in sufficient capacity for the entire site.
- 5.13 There are three possible options to discharge the surface water runoff in accordance with requirement H3 of the Building Regulations 2000<sup>6</sup>. Rainwater shall discharge to one of the following, listed in order of priority:
- an adequate soakaway or some other adequate infiltration system; or, where that is not reasonably practicable,
  - a watercourse; or where that is not reasonably practicable,
  - a sewer.
- 5.14 An assessment of the surface water runoff rates has been undertaken, in order to determine the surface water options and attenuation requirements for the site. The assessment considers the impact of the site compared to current conditions. Therefore, the surface water attenuation requirement for the developed site can be determined and reviewed against existing arrangements.
- 5.15 The surface water drainage arrangements for any development site should be such that the volumes and peak flow rates of surface water leaving a developed site are no greater than the rates prior to the proposed development, unless specific off-site arrangements are made and result in the same net effect.

### 5.2 Existing Drainage System

- 5.2.1 The current drainage at the site incorporates a sealed drainage system; surface water in the main process area is retained in the site bund until released through a penstock valve to an interceptor under supervision of the site operator. If any visible trace of oil is present, the penstock is closed and arrangements made to tanker the water offsite for disposal.
- 5.2.2 All recovered water is collected in the water storage tank for reinjection down the water injection well.
- 5.2.3 It is understood that the existing drainage infrastructure at the site efficiently and effectively manages surface water runoff generated at the site. As there is no history of surface water

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<sup>6</sup>Office of the Deputy Prime Minister, The Building Regulations 2000.

flooding at the site it is likely that the current drainage system is sufficient for the current site use.

### **5.3 Current Runoff Rate**

5.3.1 As noted in Section 3.2, the site is currently a sealed system. The majority of is re-injected into the wellhead system.

### **5.4 Post-Development Runoff Rate**

5.4.1 As noted in Section 3.3, the application is for an extension of time. Therefore, the amount of impermeable surfaces will not increase compared to current conditions due to their being no built development.

### **5.5 Post-Development Site Drainage**

5.5.1 As noted in Section 5.4, the surface water runoff from the developed site will be no different to present due to their being no built development. The proposed development of the application site will not increase in surface water runoff for all events.

5.5.2 The surface water drainage network will therefore manage the surface water runoff from the site and therefore, the flood risk from this source. There will be no increase in surface water run-off or exacerbation of off-site risk as a result of the development.

5.5.3 It is understood that the existing drainage infrastructure at the site efficiently and effectively manages surface water runoff generated at the development site. As there is no history of surface water flooding at the site it is likely that the current drainage system is sufficient for the proposed use.

## 6.0 Sequential Approach

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### 6.1 Sequential Test

6.1.1 Applications for extension of time are not subject to the Sequential Test (see para. 104 of the NPPF).

### 6.2 Exception Test

6.2.1 Applications for extension of time are not subject to the Exception Test (see para. 104 of the NPPF) and the Exception Test is not applicable to applications for 'less vulnerable' developments such as this in Flood Zone 1 as confirmed within Table 4.4 of this report and Table 3 of the Technical Guidance to the NPPF.

## 7.0 Summary and Conclusions

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### 7.1 Introduction

- 7.1.1 This report presents an FRA, in accordance with the NPPF, to support a planning application for an extension of time of working for the production of oil and gas at Storrington Oilfield until 31 December 2017. This has included an assessment of the surface water drainage requirements of the site.
- 7.1.2 This report details the flood risk at the site and how this could be managed and mitigated to allow the site to be developed in support of the enclosed planning application for an extension of time. The proposed scale of development may present risks of flooding on-site and/or off-site if flooding is not effectively managed.

### 7.2 Assessment of Flood Risk

- 7.2.1 The FRA has demonstrated the following:
- The site is not at risk of fluvial and/or tidal flooding
  - A number of secondary flooding sources have been identified in the Level 1 Screening Study which may pose a low risk to the site. These are:
    - Flooding from rising / high groundwater
    - Overland flow flooding
    - Flooding from Artificial Drainage Systems/Infrastructure Failure
  - The secondary flooding source will only inundate the site to a relatively low water depth and water velocity, will only last a short period of time, in very extreme cases and will not have an impact on the whole of the proposed development site.
  - The entire site has a 'low probability' of flooding as the site is located within Flood Zone 1 with less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1%)
  - The proposed development is classified as 'less vulnerable', 'less vulnerable' uses are appropriate within Flood Zone 1 after the completion of a satisfactory FRA.
- 7.2.2 Table 7.1 summarises the probability and consequence of flooding for the site with and without mitigation measures.

**Table 7.1: Probability and consequences of all sources of flooding**

Flooding Source	Potential Source	Probability	Consequence & Impact Without Mitigation	Consequence & Impact With Mitigation	Comment
Fluvial flooding	River Arun and Rother	Negligible	Negligible	Negligible	None
Tidal flooding	None	Negligible	Negligible	Negligible	None
Flooding from rising / high groundwater	Aquifer	Low	Low	Negligible	No below surface infrastructure/buildings are proposed
Overland flow flooding	Poor Permeability	Low	Low	Negligible	Will not affect the whole site area
Flooding from artificial drainage systems	Sewers	Low	Low	Negligible	Will not affect the whole site area
Flooding due to infrastructure failure	None	Negligible	Negligible	Negligible	None

**Key:**

*Green - Negligible, Yellow - Low, Orange - Medium and Red - High.*

### 7.3 Site Drainage

- 7.3.1 In addition, the FRA has considered the potential impact of the development on surface water runoff rates.
- 7.3.2 The surface water runoff from the developed site will be no different to present due to their being no built development. The proposed development of the application site will not increase in surface water runoff for all events.
- 7.3.3 The surface water drainage network will therefore manage the surface water runoff from the site and therefore, the flood risk from this source. There will be no increase in surface water run-off or exacerbation of off-site risk as a result of the development.
- 7.3.4 It is understood that the existing drainage infrastructure at the site efficiently and effectively manages surface water runoff generated at the development site. As there is no history of surface water flooding at the site it is likely that the current drainage system is sufficient for the proposed use.

#### **7.4 Sequential Approach**

##### *Sequential Test*

7.4.1 Applications for extension of time are not subject to the Sequential Test.

##### *Exception Test*

7.5.2 Applications for extension of time are not subject to the Exception Test and the Exception Test is not applicable to applications for “highly vulnerable” developments such as this in Flood Zone 1.

#### **7.5 Conclusion**

7.5.1 Therefore this FRA demonstrates that the proposed development would be operated with minimal risk from flooding, would not increase flood risk elsewhere and is compliant with the requirements of the NPPF.

7.5.2 The development should not therefore be precluded on the grounds of flood risk.





Key



Site Location  
(TC0088754900)



STEP Business Centre, Wortley Rd, Sheffield, S36 2UH

CLIENT:  
iGas Plc

SCALE: 1:20,000@A3 SHF.313.003.D.001

PROJECT REF:  
PROJECT REF:  
DRAWN: MG

CHECKED: MT  
DATE: Nov 2012

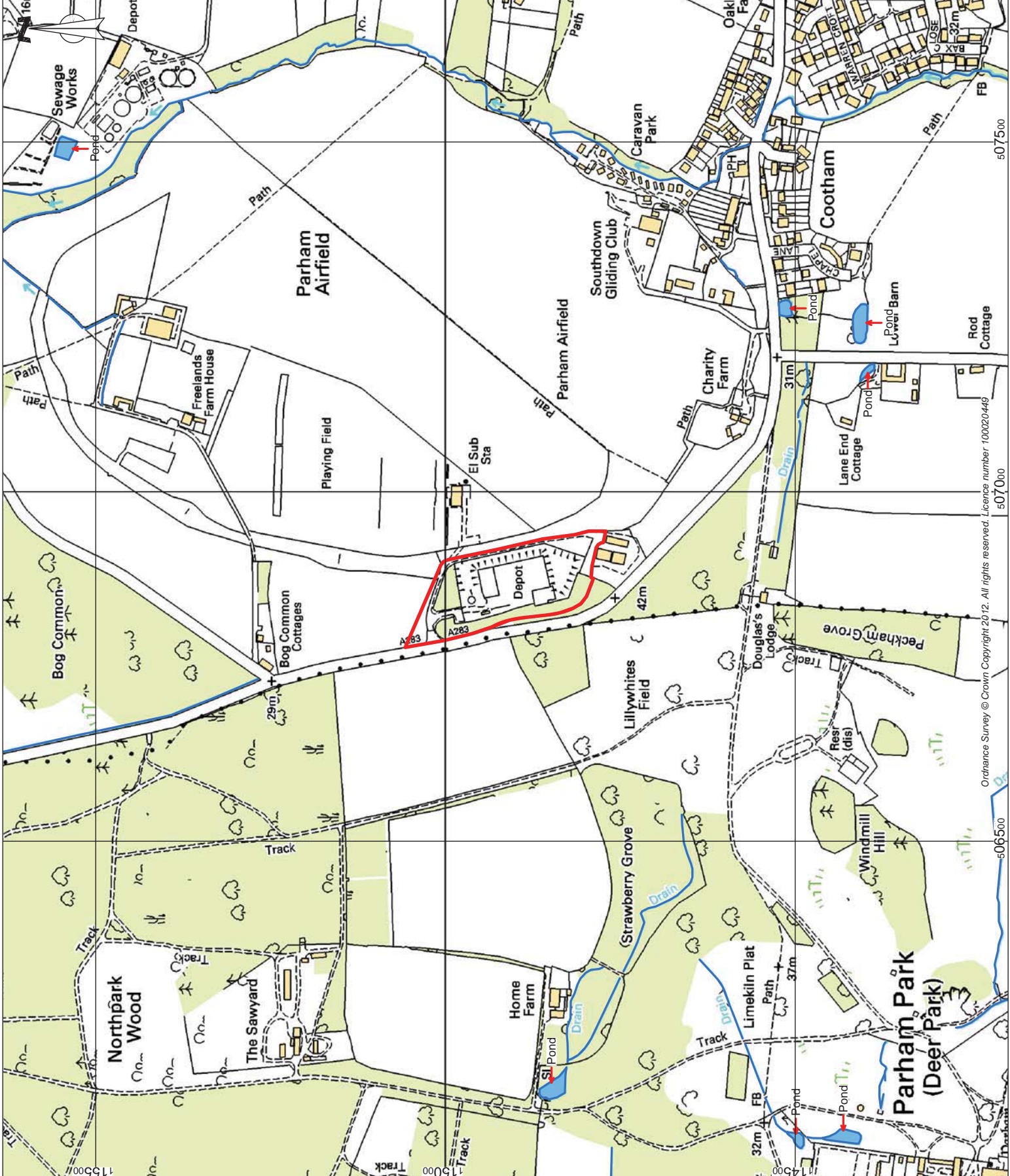
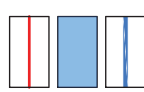
PROJECT:  
Storrington Wellsite FRA

TITLE  
Site Location Plan

FIGURE NO:  
1

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Key

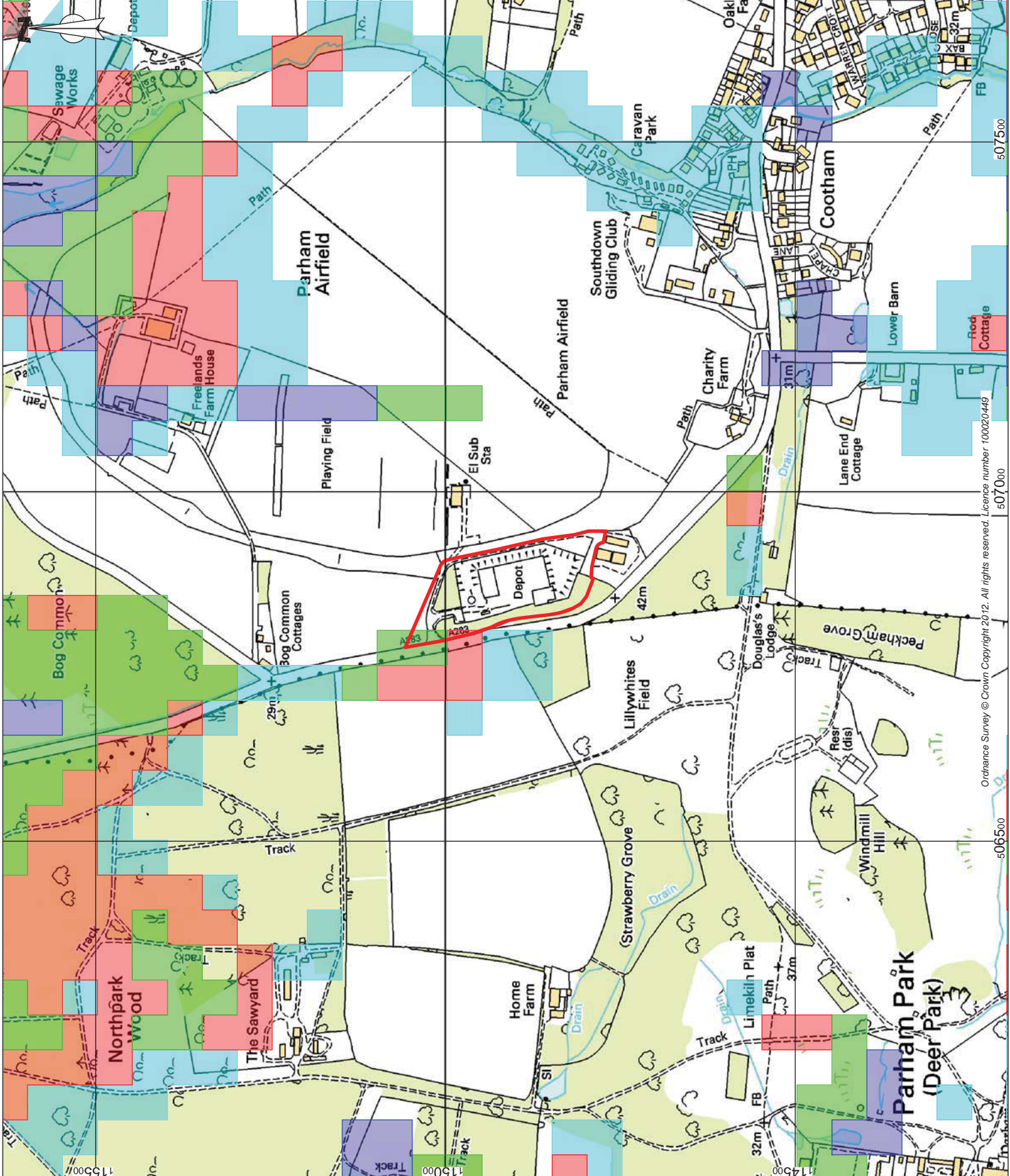


CLIENT:	iGas Plc
PROJECT REF:	SHF.313.003.D.002
SCALE:	1:5,000@A3
CHECKED:	MT
DATE:	Nov 2012
DRAWN:	MG
PROJECT:	Storrington Wellsite FRA
TITLE:	Surface Water Features
FIGURE NO:	2

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Key

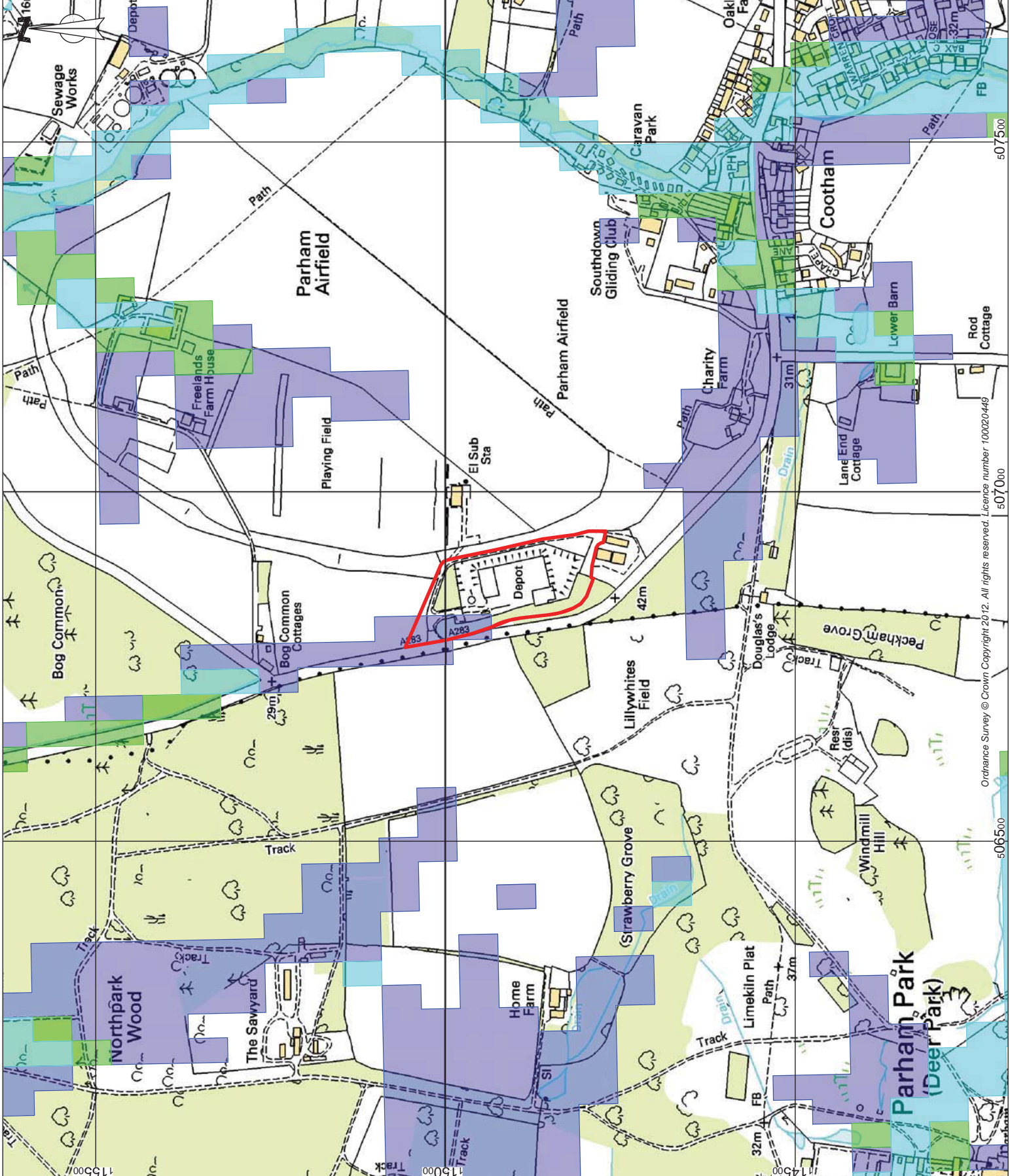
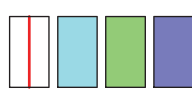


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SCALE:	1:5,000@A3
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DATE:	Nov 2012
DRAWN:	MG
PROJECT:	Storrington Wellsite FRA
TITLE:	BGS Groundwater Flooding Susceptibility
FIGURE NO:	3

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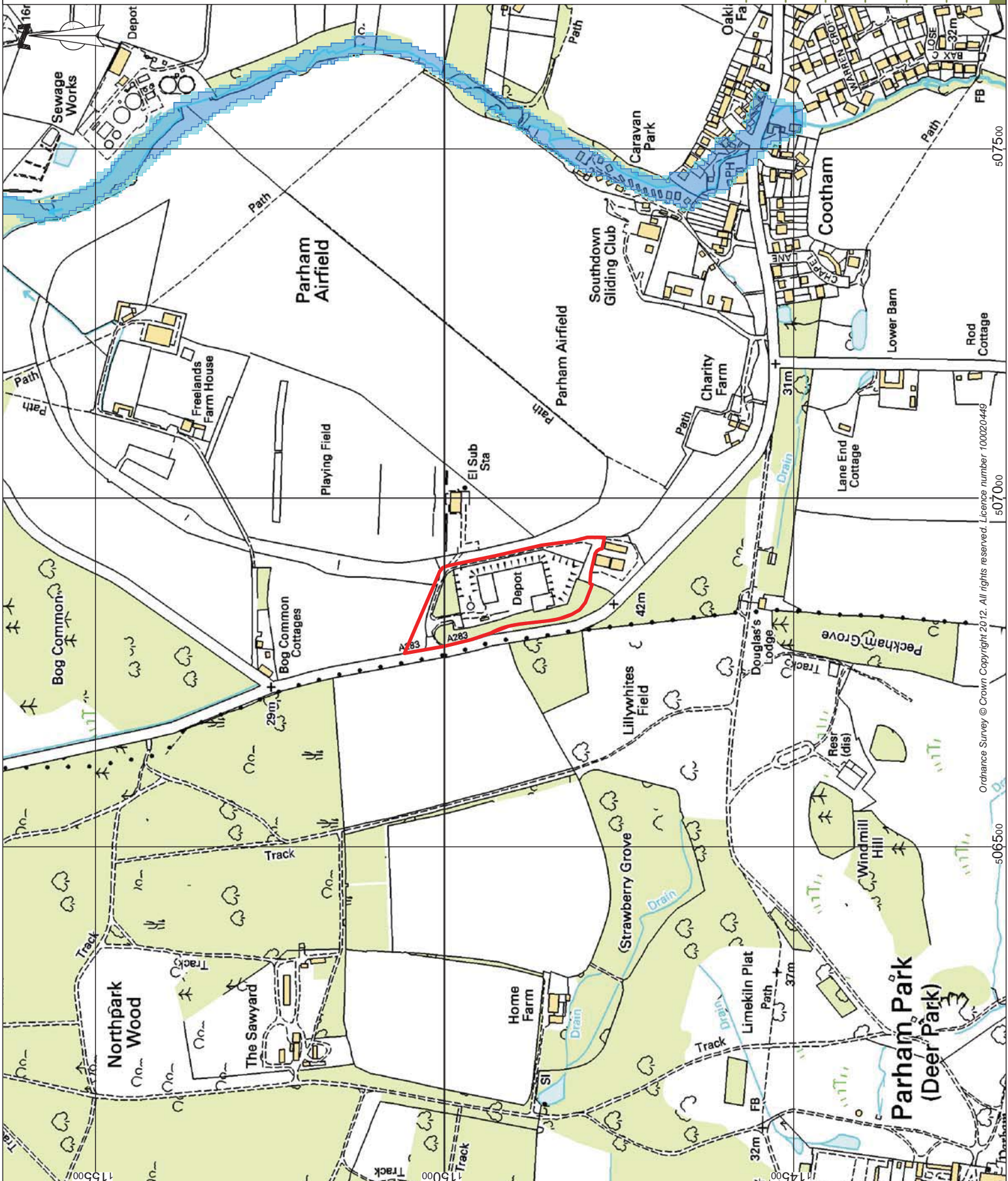
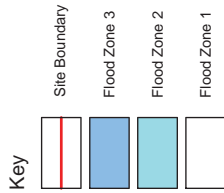
Key



CLIENT:	iGas Plc
PROJECT REF:	SHF.313.003.D.004
SCALE:	1:5,000@A3
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DATE:	Nov 2012
DRAWN:	MG
PROJECT:	Storrington Wellsite FRA
TITLE:	RMS Overland Flow Flooding
FIGURE NO:	4

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CLIENT:	iGas Plc
PROJECT REF:	SHF.313.003.D.005
SCALE:	1:5,000@A3
CHECKED:	MT
DATE:	Nov 2012
DRAWN:	MG
PROJECT:	Storrington Wellsite FRA
TITLE:	Environment Agency Flood Zones
FIGURE NO:	5

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## Appendix 1 – Environment Agency Correspondence

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Mr Matt Travis  
Enzygo  
Step Business Centre (Unit 33)  
Wortley Road  
Deepcar  
Sheffield  
S36 2UH

**Our ref:** HA/2012/113646/01-L01  
**Your ref:** iGas Plc  
**Date:** 03 December 2012

Dear Mr Travis

### **STORRINGTON WELLSITE, COOTHAM SURREY**

Thank you for your pre planning enquiry regarding the above which was received on 28 November.

In this instance, we have taken a risk based approach and will not be providing bespoke comments.

According to the National Planning Policy Framework (NPPF) paragraph 103 (note 20) sites of one hectare and greater in Flood Zone 1 require a Flood Risk Assessment (FRA).

We would recommend that the FRA demonstrates the following as a minimum:

1. That it will be feasible to balance surface water run-off to the pre-developed run-off rate for all events up to the 1 in 100 year storm (including additional climate change allowance\*) and set out how this will be achieved, or achieve betterment in the surface water runoff regime; ensuring that surface water runoff will not increase flood risk to the development or third parties.
2. How sustainable drainage system techniques (SUDs) will be used with any obstacles to their use clearly justified. (This should include, where appropriate, provision for the adoption of drainage infrastructure and maintenance contribution to that party).

\* *Climate Change* - An allowance for climate change needs to be incorporated, which means adding an extra amount to peak rainfall (20% for commercial development, 30% for residential).

3. The residual risk of flooding can be managed safely should any drainage features fail or if they are subjected to an extreme flood event. Surface water may be managed above ground in designated open areas and at shallow depths for events with a return period in excess of 30 years, but this should not put people and property at unacceptable risk. Raising of ground or floor levels could be proposed to manage risk, where appropriate.
4. An assessment of flood risk associated with 'ordinary watercourses' may also be necessary as our Flood Zone Maps primarily show flooding from main rivers, not ordinary watercourses with a catchment of less than 3km<sup>2</sup>.

Further guidance on site specific FRA's can be found in the Planning Policy Statement 25 (PPC25) Practice Guide, which has been retained despite the cancellation of PPS25.

For further information on Sustainable Drainage Systems (SuDS) 'dry islands' and situations where disposal to a public sewer is proposed, please refer to the Environment Agency Flood Risk Standing Advice at: <http://www.environment-agency.gov.uk/research/planning/82584.aspx>

Helpful sources of information on SuDS include:

- the CIRIA C697 document SuDS manual
- HR Wallingford SR 666 Use of SuDs in high density developments
- CIRIA C635 Designing for exceedance in urban drainage – good practice
- the Interim Code of Practice for Sustainable Drainage Systems. The Interim Code of Practice provides advice on design, adoption and maintenance issues and a full overview of other technical guidance on SuDS.

The Interim Code of Practice is available on our website at: [www.environment-agency.gov.uk](http://www.environment-agency.gov.uk) and CIRIA's website at [www.ciria.org.uk](http://www.ciria.org.uk)

The NPPF paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121).

Please note that the view expressed in this letter by the Environment Agency is a response to a pre application enquiry only and does not represent our final view in relation to any future planning application made in relation to this site. We reserve the right to change our position in relation to any such application.

You should seek your own expert advice in relation to technical matters relevant to any planning application before submission

I hope the above comments are satisfactory but if you require any further information please contact me.

Cont/d..

Yours sincerely

**Helen Tier**

**Environment Agency  
Sustainable Places Planning Adviser**

Direct dial 01903 703862

Direct e-mail [PlanningSSD@environment-agency.gov.uk](mailto:PlanningSSD@environment-agency.gov.uk)

End



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