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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.



Storrington Oilfield, Storrington, West Sussex.

May 2013

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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 planning permission 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 proposal does not involve any new physical development, as the wellsite and production equipment are already in place. The previous planning permission lapsed on 31 December 2012 and the applicant wishes to retain the site and extend the period of hydrocarbon recovery for a temporary period of 5 years. As such it is necessary to submit a full application in order to do this. 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 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.

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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 31st 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, equipment and operations and extend the lifetime of the wellsite and operations by 5 years until 31st December 2017 to maximise recovery of the final reserves of oil.

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- 1.4 An application 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.

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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 STO-02. 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 01C. 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 (disused), 2 substations, switchroom and a crude oil heater. There are also 7 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.


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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 1MW 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 31st 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.
- 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

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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 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.”

- 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 links between the applicant, local representatives and the Mineral Planning Authority throughout the course of the development. The liaison panel met, but after a while it was agreed that it was no longer necessary.

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3.7 This application has lapsed. An application was submitted to vary it, but this was not validated as it was considered that an up to date noise survey was necessary. A noise survey could not be produced in time and so a full application is now required to retain the site for a further 5 years.


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 31st 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 electricity generation utilising the plant hereby approved or the 31st December 2012 whichever is the earlier”.

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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 retain the wellsite, equipment and hydrocarbon production operations at Storrington and extend the lifetime of the oilfield and operations by 5 years until 31 December 2017.
- 4.2 The proposal 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 the restoration details which were approved under 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.
- 4.5 The wellsite operations do not involve fracking

Export of Oil and Transport Movements

- 4.6 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.

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4.7 As stated in Section 3, as part of Planning Permission reference SR/68/96, there was a unilateral agreement in place which meant that all tankers enter or leave the site in a westerly direction. The Wellsite operates six days per week (Mondays to Saturdays inclusive). It is intended to continue to operate movements from the site in this manner.

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

Manning of Wellsite at Storrington Oilfield

4.9 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

4.10 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.

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

4.12 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

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- 4.13 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.
- 4.14 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.
- 4.15 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

- 4.16 Any gas produced is collected and flared.

Lighting

- 4.17 Permission SR/1/94 and its subsequent variation SR68/98 included lighting proposals, although these were not shown on any approved layout plan. The Planning Statement for SR/68/96 paragraph 8.8d mentions that all lights would be shrouded, although at the time there was no plan indicating the position of lighting.
- 4.18 A layout plan Ref STO 03A – Lighting Plan is included in Appendix I to show the locations of the lighting columns on site. All site lighting at Storrington is task specific lighting and predominately at low level. The lights are 58 watts. The lights are mounted on various height columns or walkways according to the equipment/tasks they are illuminating. A photograph of a typical lighting column on site is enclosed in Appendix 3. The majority are around 1.8m in height, although there are a few lights on the walkway over the water

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and oil storage tanks at approximately 5m in height. The site is not staffed overnight and so the lighting is not operated then, but it is used during the daytime (if weather conditions require them) and for health and safety reasons (for example should lighting be required at site in the night-time in case of emergency).

Elevations of Plant and Buildings.

- 4.19 The elevation of the plant and buildings are the same as those approved under SR/68/96 which was a variation of permission SR/1/94. The approved elevations submitted for SR/1/94 were in photographic format. (A poor quality fax that was sent to West Sussex County Council of the equipment photographs – is included in Appendix 3 to show this information). For SR/68/96 dimensions and in particular heights were given for the key pieces of plant and equipment. The plant and equipment is the same as was permitted in SR/68/96, a schedule is included in Appendix 3 showing the main equipment on the wellsite site and key dimensions.

Restoration of the Oilfield

- 4.20 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. The site will be restored to its original levels.

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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 permission has lapsed and 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. (See Appendix 6 for justification)
- 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 includes 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 consideration. In addition the National Planning Policy Framework (NPPF) and any other statements of Government policy must be taken into account.

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5.5 The key considerations in relation to this proposal are: whether the proposal is 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:

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

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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 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.

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National Planning Policy Framework (2012)

5.12 On 27th 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 (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

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i.e. the saved policies of the West Sussex Minerals Plan 2003 and the adopted Horsham Core Strategy Development Plan Document (DPD) 2007.

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 4. 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.

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;*

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- *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)*

5.20 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.

5.21 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.

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

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


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“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.”*


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

5.25 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


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indigenous supplies of fossil fuels as this helps the UK achieve a security of supply in volatile and competitive international markets.

- 5.26 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.
- 5.27 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 views from within the designated land and can only be glimpsed from close up along the access to Charity Farm and the Pulborough Road.
- 5.28 Production at the wellsite is declining and therefore visual impacts associated with operations such as HGV vehicles leaving the site are also slowly 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.


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- 5.29 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.
- 5.30 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.
- 5.31 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 impacts on the South Downs National Park. In addition the operations and the site are temporary and will be restored to agriculture.
- 5.32 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*

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relatively undisturbed by noise and are prized for their recreational and amenity value”.
(Paragraph 123; NPPF March 2012)

- 5.33 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 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.”*
- 5.34 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.
- 5.35 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

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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 noise survey contained in Appendix 7 shows that the site operates within the current approved noise limits and would continue to do so if an extension of time is permitted.

- 5.36 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

- 5.37 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;*

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- 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)


5.38 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 developed and operational and so it is not considered that there will be any adverse impacts on the historic environment.

5.39 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


5.40 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*

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

- 5.41 **Policy 1** –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.
- 5.42 **Policy 12** - 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.
- 5.43 **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 are in


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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.

- 5.44 **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.
- 5.45 **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.
- 5.46 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

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aims or purposes of these policies which seek to protect the National Park and environmental resources and amenities of the district.

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6.0 Planning Assessment

6.1 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. The application essentially seeks to retain the wellsite for an additional 5 years, whilst hydrocarbon reserves are still being produced at a viable rate. After this time the wellsite will be restored to agriculture.

6.2 The key environmental and amenity issues with the proposal are identified to be landscape character and visual impact on the setting of the South Downs National Park, noise and other environmental impacts (air, flood risk) from continued operating of the plant on the amenity of local residents and the local community and impact on highways associated with continued traffic movements associated with the site.

Environmental Impact Assessment

6.3 The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 implements the European Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment. It is not considered that this development is likely to give rise to significant environmental effects and as a consequence does not warrant EIA. The reasons for this are set out in Appendix 6.


Landscape Character and Visual Impact

6.4 The wellsite itself is not covered by any national or international designations, but as stated previously the wellsite is located outside but in close proximity to the boundary of

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the South Downs National Park. The wellsite is separated from the South Downs National Park by the A283, which acts as a clear divide between the different landscape characteristics of the National Park and the Parham Estate and the more semi-urbanised settings of the settlements of Cootham and Storrington. The application site is already developed and the industrial character of the wellsite is limited to the immediate environs of the wellsite itself. The buildings associated with the airfield, gliding club and Charity Farm also add to the developed character of this side of the A283.

- 6.5 A visual assessment was undertaken for permission SR/1/94 and a visual update was prepared for planning permission SR68/96. These assessments are included in Appendix 5. They were undertaken to assess the impact of the wellsite and associated development. As part of this application a number of these viewpoints have been revisited to show that the impact has not changed over time. In addition some extra viewpoints have been included from inside the South Downs National Park. These photographs are contained in Appendix 5.
- 6.6 The assessments demonstrate that Storrington wellsite is well screened from any surrounding views by the planting and bunding around the wellsite. Views from beyond this are further screened by vegetation in the surrounding countryside. The topography and intervening vegetation is such that there are very limited views of the wellsite from inside the National Park; even from the top of the South Downs escarpment any views of the wellsite tend to be distant and limited. (See photographs 2, 3 and 4 in Appendix 5)
- 6.7 In landscape character terms it is assessed that the wellsite is located close to Parham airfield and farm buildings, such that the landscape has already been modified and the sensitivity/impact of retaining the wellsite on the local landscape is low. The eastern side of the A283 where the wellsite, airfield and farm complex lies is visually separated and


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screened from passing traffic along the road by a tree lined hedge. This visual separation of the wellsite together with the nature of the surrounding land uses results in a landscape that can easily accommodate the retention of the wellsite for an additional 5 years without any wider impact on the local landscape character or on the character or setting of the South Downs National Park.

- 6.8 Overall it is assessed that in terms of landscape character any impacts are localised. Retention of the wellsite will have a neutral effect.

Noise

- 6.9 Condition 6 of planning consent SR/68/96 requires that a noise monitoring scheme be submitted and approved as part of the permission. The noise monitoring scheme 'Storrington development noise monitoring scheme' AT4118/S1/BCP [Reference 1] was submitted and approved in 1997 and is considered to be still appropriate.
- 6.10 Condition 8 requires noise levels at the façade of any residential property to not exceed 45 dB LAeq, 1h during the periods in which well drilling operations are being carried out and 35 dB LAeq, 1h at all other times.
- 6.11 Background noise levels around the Storrington area are high and annual noise assessments have not been requested by West Sussex County Council for the wellsite. The noise levels are compliant with the approved levels set by Condition 8 and as such an annual survey for noise has not been necessary. The annual enforcement visits to Storrington show that the applicant has been compliant with noise conditions 6 and 8.
- 6.12 As part of the renewal of this planning application West Sussex County Council requested that noise measures be undertaken and submitted as part of the application. Measurements were conducted during the night-time hours on the 16th / 17th April

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2013 in accordance with the monitoring scheme. A noise survey and assessment is contained in Appendix 7.

- 6.13 The noise environment during the survey period was dominated by the nearby road A283 and other sources of noise. The site was generally inaudible at most residential locations.
- 6.14 Due to such low contributions from the wellsite, a calculation has been used to assist in assessing the contribution of the site at noise sensitive receivers. Two methods were used:
- > Correcting LA90 levels measured at each receiver location; and
 - > Prediction of the noise contribution from the wellsite at receiver locations using measurements conducted at the wellsite boundary.
- 6.15 The maximum calculated contribution due to the site at the façade of the closest noise sensitive receiver is 26 dB LAeq. This is well below the planning noise limit of 35 dB LAeq.
- 6.16 Continued operation of the site for an additional 5 years will not have any noise impacts on the local community or residents. The site will continue to operate as present and as such will be able to operate at or below the extant noise limit of 35dB LAeq.

Nature Conservation

- 6.17 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.

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6.18 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.

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


Other Environmental Impacts

6.20 The environmental impacts of the development are set out in the planning statement accompanying the application. With regards to emissions to air and water the site is regulated by the Environment Agency (EA) through an Environment Permit to ensure that appropriate mitigation measures are managed and equipment and operations are functioning properly.

6.21 In relation to potential emissions of surface and ground water, the site operates a closed system. The wellsite was constructed such that the site incorporates a sealed drainage system. It is underlain by an impermeable membrane and the site is surrounded by a lined perimeter drainage ditch. All surface run off from the site is collected in the perimeter ditch and then released via 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 are made to tanker this water off site to a suitable regulated waste disposal facility.

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- 6.22 All recovered water is collected in the water storage tanks and the re-injected down the water reinjection well. There is no risk of emissions to groundwater as the site is sealed; in addition groundwater quality is monitored by the EA through groundwater monitoring boreholes around the site. These matters are covered in Appendix 4 (Flood Risk Assessment) and paragraphs 4.13, 4.14 and 5.35 of this Planning Statement.
- 6.23 In relation to potential emissions to air there could be emissions of NO_x, SO_x and CO and CO₂ from the flaring operations and NO_x and particulates from the associated vehicle movements. However, as set out below the levels of these emissions are considered to be insignificant such that further assessment is not required.
- 6.24 Any gas produced during the hydrocarbon production process at Storrington is flared in the enclosed ground flare located in the south east corner of the site. This ground flare was approved as part of SR/68/96. There is no visible flame as a result of the flaring process and waste gases are combusted in this process.
- 6.25 The only potentially significant residual emissions could be nitrogen dioxide (NO₂) and sulphur dioxide (SO₂). Emission data of these gases is regularly provided to the EA as part of the Environment Permit, so that they can monitor the site. If there were any concerns regarding the existing operation of the flare in terms of these emissions the EA would request remedial action. The EA have no issues with current emissions. Levels of nitrogen dioxide (NO₂) and sulphur dioxide (SO₂) produced at Storrington are considered to be insignificant in planning terms and safe in relation to the health of local residents and the sensitive local ecological environment.
- 6.26 In terms of emissions from traffic associated with the proposal the levels of NO_x or particulates arising from the 4 tanker movements and between 12 -16 associated staff movements per week is considered negligible.

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Highways and Traffic

6.27 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. As part of Planning Permission reference SR/68/96, there was a unilateral agreement in place which meant that all tankers enter or leave the site in a westerly direction. The Wellsite operates six days per week (Mondays to Saturdays inclusive). It is intended to continue to operate movements from the site in this manner. Tankers travel between Storrington and Holybourne via the A283, A272, A3 and A31 only. 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.

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7.0 Conclusion

- 7.1 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.
- 7.2 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 granted for the retention of the Wellsite for an additional 5 years period to maximise oil reserves in the interests of sustainable development.