	Storrington Wellsite	
---	-----------------------------	--


Appendix 6 - Justification why proposal is not EIA development

It is considered that this development is not likely to give rise to significant environment effects and as a consequence does not warrant Environmental Impact Assessment (EIA) for the reasons set out in the paragraphs below:

Class 14 of Schedule 1 in the Town and Country Planning (Environmental Impact Assessment (England and Wales) Regulations 2011 identifies that development for the “extraction of petroleum and natural gas for commercial purposes where the amount extracted exceeds 500 tonnes per day in the case of petroleum and 500,000 cubic meters in the case of natural gas” is defined as EIA development and as such must be accompanied by an EIA.

Currently the applicant extracts up to 80bopd at Storrington, which is well below 15 tonnes of oil per day and as such this proposal is not considered to be Schedule 1 EIA development.

Schedule 2 Development under the 2011 Regulations is defined as being development likely to have significant effects on the environment by virtue of factors such as its nature, size and location. Category 2e of Column 1 of Schedule 2 of the EIA Regulations 2011 identifies that the surface industrial installations for the extraction of hydrocarbons may be EIA development. Indeed, Column 2 of the indicative thresholds and criteria show that if the site area exceeds 0.5 hectares then the proposal is Schedule 2 development. The site area at Storrington is over 0.5hectares and as such further consideration has been given as to whether the development/extension of time of operations is likely to result in significant adverse impacts to justify Environmental Impact Assessment.

	Storrington Wellsite	
---	-----------------------------	--

Annex A of Circular 02/99 provides indicative thresholds to help make judgments about Schedule 2 development. The indicative threshold for surface industrial installations for the extraction of petroleum and natural gas are in relation to the scale of development, emissions to air, discharges to water and the risk of accident and arrangements for transporting the fuel. EIA is more likely to be required if the development is on a major scale (site of 10 hectares or more) or where production is expected to be substantial (eg. more than 100,000 tonnes of petroleum per year). The variation at Storrington seeks to extend the life of the wellsite for an additional five years, but production is steady at 80bopd (approximately 4000 tonnes per annum).


The wellsite at Storrington is 2.81 ha in area, which is considerably smaller than the 10ha indicative threshold indicated by EIA guidance. Therefore the continued extraction at Storrington and the size of the wellsite are not considered to be major and justify EIA alone.

The proposal does involve the retention and continued operation of the wellsite for the production of hydrocarbons for an additional five years, but as discussed in the planning statement and under point I, in this letter, the above activities are not considered to result in significant emissions to air or discharge to water.

In relation to traffic movements associated with the wellsite, the production activities generate 4 tanker movements per week and between 12-16 staff movements. There will be no increase in traffic movements over the existing activity and access is on to the A283 A road, using the existing access.

There is no formal definition of what constitutes significance but Circular 2/99 suggests that there are three main criteria:

- i) major developments which are more than local importance;

	Storrington Wellsite	
---	-----------------------------	--

- ii) developments which are proposed for a particularly environmentally sensitive area or vulnerable location;
- iii) developments with unusually complex or potentially hazardous environmental effects.


The advice of EC Directive 97/11/EC about the nature, size and location of the development is also relevant. Schedule 3 of the Town and Country Planning Regulations 2011, provides the selection criteria for screening Schedule 2 Development. It suggests that the characteristics of the development, the location and the characteristics of the potential impact, are important in assessing the significance of the proposal.

Therefore these matters are set out below in relation to the application for extension of time at Storrington wellsite.

Characteristics of the Project: - The proposal is associated with extending the lifetime of an existing production wellsite by 5 years. There are no new activities/operations or development proposed as a result of the extension of time, just a continuation of permitted activities. As discussed above in relation to the indicative characteristics of the proposal - it is not considered to be major. The plant and equipment are all in place and the scale of production means that the operations are relatively low key.

All activities take place within the existing wellsite and have been covered by the limits set by permission SR/68/96.

Location and Sensitivity of the Site and Surrounding Area – The EIA Regulations define “Sensitive Areas” as including nature conservation sites with national or higher level designations, (eg Sites of Special Scientific Interest, Special Protection Areas and RAMSAR sites), Areas of Outstanding Natural Beauty (AONBs), National Parks, World Heritage Sites


	Storrington Wellsite	
---	-----------------------------	--

and Scheduled Ancient Monuments. The application site is currently used as a hydrocarbon wellsite and it is proposed to extend this use for a further 5 years, before the operations are removed and the site is restored to agriculture. The site itself is not covered by any national or international designations, but on the other side of the A283 is Parham Park, which is designated as a Site of Special Scientific Interest and the site lies adjacent to the boundary of the South Downs National Park, which also runs along the western side of the A283.

As discussed in this Planning Statement and as shown by the original visual assessments contained in Appendix 5 the site is well positioned in relation to the National Park (AONB as was), such that there are very limited views, of the wellsite from within the park, and views are glimpsed and at a distance. It is not considered that the visual impact of retaining the wellsite, adjacent to the National Park presents significant adverse impacts to justify an EIA.

Similarly adverse impacts of the construction of the wellsite and operation of the wellsite, in relation to the proximity of the SSSI at Parham Park were fully investigated in relation to permissions SR1/94 and SR68/96. The impacts were assessed and considered to be such as to allow planning permission to be granted. The existing production operations are at lower rate than when permission was granted in 1997 for SR68/96. The site has been controlled through planning condition and operates within the controls of the Environmental Permit. It is not considered that retention of the wellsite for an additional five year period will result in significant adverse impacts on the nature conservation value of the SSSI to justify EIA.

Characteristics of the Potential Impact – The characteristics of retaining the wellsite and operations for an additional period are identified as: visual and landscape character impacts, traffic movements, noise from operations, emissions to air and water and ecological

 <p>IGas Energy</p>	Storrington Wellsite	
---	-----------------------------	--

impacts. As discussed in this letter and as set out in the accompanying planning statement to the application none of these impacts are considered to be at such a level or scale to warrant EIA. The operations are not unduly complex or major. The proposal will be for a limited period and the site will be restored to agriculture.

There is no new physical development or change in operations as a result of this proposal and therefore it is not considered that there will be any significant adverse impacts on the local community as a result in the retention of this site, in terms of noise or visual impacts.

Overall the conclusion is reached that the proposed development will not give rise to significant environmental effects to warrant EIA. The nature of the activity is temporary and the scale of the operations and the characteristics of the impacts are not considered such as to justify EIA, even given its location adjacent to an SSSI and the National Park. . Issues of landscape, ecology, traffic, noise and emissions are addressed in the planning statement accompanying the application.