

# HOLMWOOD

## A1 WELL SITE, SURREY

### Planning Statement



**BARTON  
WILLMORE**



**October 2008**

# Planning Statement

Proposed Exploratory Well  
Holmwood A1 Well Site  
Land at Abinger Forest  
Coldharbour Lane, Capel, Surrey

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**Coldharbour Lane, Capel, Surrey**

Barton Willmore  
Elizabeth House  
1 High Street  
Chesterton  
Cambridge  
CB4 1WB

Tel: 01223 345 555  
Fax: 01223 345 550

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## 1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared by the Barton Willmore Partnership on behalf of Europa Oil and Gas (UK) Limited and provides the planning justification for a temporary full planning permission for an exploratory hydrocarbon well, at land at Bury Hill Wood Quarry, Capel, Surrey, known as Holmwood A1 Well Site.

### **Background**

- 1.2 In September 2007 Europa Oil and Gas submitted a planning application, accompanied by an Environmental Statement (ES) to The County Planning Authority (CPA) for an exploratory hydrocarbon well at the site the subject of this application. The CPA considered insufficient information had been submitted to formally register the planning application and wrote to the applicant on the 12 November advising the application was invalid and that further information should be forthcoming to accompany the ES.
- 1.3 On the 10 December 2007 a meeting between the CPA and the applicant was held at Surrey County Council. The purpose of the meeting was to discuss the contents of a future planning application and accompanying ES. Based on the outcomes of this meeting Europa revisited their proposal, taking account of comments made by the CPA. A pre-submission draft version of the revised ES was thereafter submitted to the County Council in June 2008, which was made available to the principal in house consultees. Following constructive feedback from the CPA, the ES has been revised and Europa Oil now resubmit their proposal seeking approval to undertake the short term development.

### **Europa Oil and Gas (UK) Limited**

- 1.4 Europa Oil & Gas (Holdings) plc, through its wholly-owned subsidiary, Europa Oil & Gas (UK) Limited, (hereafter referred to as Europa) is applying on behalf of the PEDL143 licence holders for planning permission to drill an exploratory borehole near Holmwood, south of Dorking, in the County of Surrey.
- 1.5 The partnership has identified a drillable prospect, the 'Holmwood Prospect', in the Weald Basin with the potential for either gas or oil at a depth of approximately 900 metres in Jurassic sandstones. The proposed exploratory well is located within the Surrey Hills Area of Outstanding Natural Beauty (AONB). Europa and its partners fully recognise the sensitivity of the area and the requirement to mitigate any environmental impact.

- 1.6 Europa has employed a sensitive approach to planning and plans to drill the borehole from an appropriate remote surface location and use directional drilling techniques to reach the hydrocarbon objectives, some 1.2km south of the surface location. Europa, acting as Operator for the partnership, has both the experience and expertise to drill this short duration exploration well and has taken every precaution to ensure minimal disruption with no permanent impact.
- 1.7 Europa will operate and supervise the drilling of the proposed exploration well. Its parent company Europa Oil & Gas (Holdings) plc is currently producing over 250 barrels of oil per day (bopd) through its operations in the UK. In the UK, the company has interests in six licences and operates five of these licences (**Table 1.1**).
- 1.8 In late 2002, Europa operated the drilling and completion of the onshore Whisby-4 well, a 1,600 metre horizontal well which was completed without major incident as an oil producer. In 2003, Europa drilled a new 2,200 metre horizontal production well on the West Firsby Oilfield, West Firsby-7, and subsequently drilled the 2,070 metre horizontal West Firsby-8 well in 2004. These two onshore West Firsby wells were both drilled without incident. Europa also acquired a small onshore seismic survey in Lincolnshire in 2001 and has recently completed a 52 km seismic acquisition on the nearby PEDL150 Exploration licence scheduled to begin late February 2007.
- 1.9 Europa has been approved as an UK Offshore Operator by the Department for Business, Enterprise & Regulatory Reform (incorporated into the recently created Department of Energy and Climate Change) which requires stringent health and safety practices to be in place in the Company and a high degree of technical competence to ensure safe drilling practices in harsh and environmentally sensitive areas.
- 1.10 Europa has also demonstrated, by drilling and completing three UK onshore horizontal wells over the last 6 years, a current track record of operating to the highest standards in the UK onshore environment and is confident of maintaining this record with an exploration well on the Holmwood Prospect.

**TABLE 1.1 Europa Oil and Gas Limited Licence Interests**

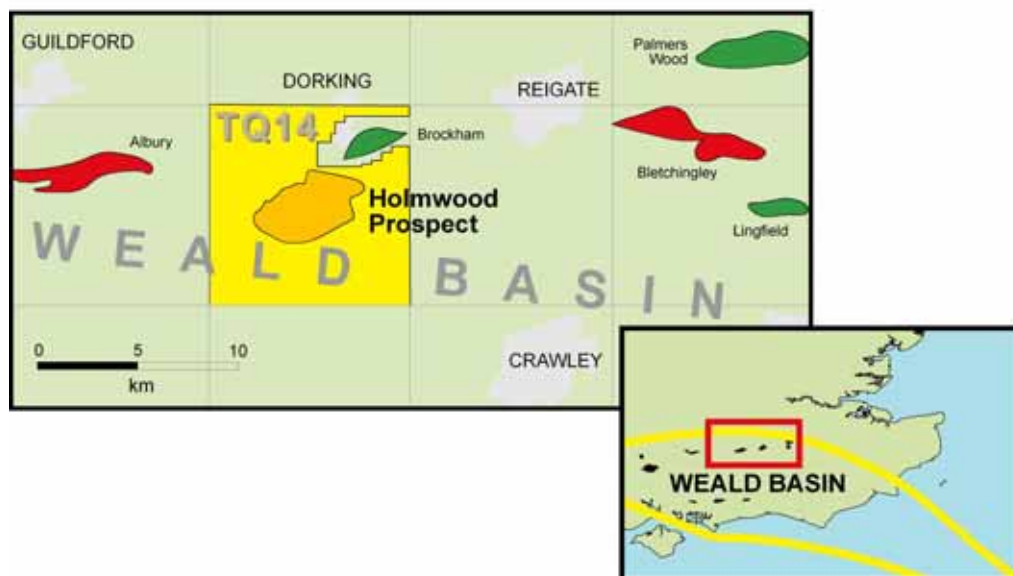
Country	Licence	Interest	Operator	Project	Status
UK	DL003	100%	<b>Europa</b>	West Firsby Oilfield (onshore)	Production
	PL199-2 & PL215b	65% Whisby-4 well only	<b>BPEL</b>	Whisby Oilfield (onshore)	Production
	PEDL143	40%	<b>Europa</b>	Holmwood Prospect (onshore)	Exploration
	PEDL150	75%	<b>Europa</b>	Doddington South Lincolnshire (onshore)	Exploration
	DL001	100%	<b>Europa</b>	Crosby Warren Oilfield (onshore)	Production

**Licence PEDL143**

1.11 Licence PEDL143 was awarded to the partnership in the 12<sup>th</sup> UK Onshore Licensing Round for 6 years with an effective date of 1 October 2004. The licence has an area of 92 square kilometres and covers the Licence Block TQ14 (**Figure 1.1**) south of Dorking. The licence was awarded with the condition that the partnership agreed to drill one well in the licence before the initial licence term expired. The partnership consists of the following working interest partners:

Europa Oil & Gas Limited (operator)	40.00%
Egdon Resources (UK) Limited	38.14%
Warwick Energy Exploration and Production Limited	20.00%
Altwood Petroleum Limited	1.86%

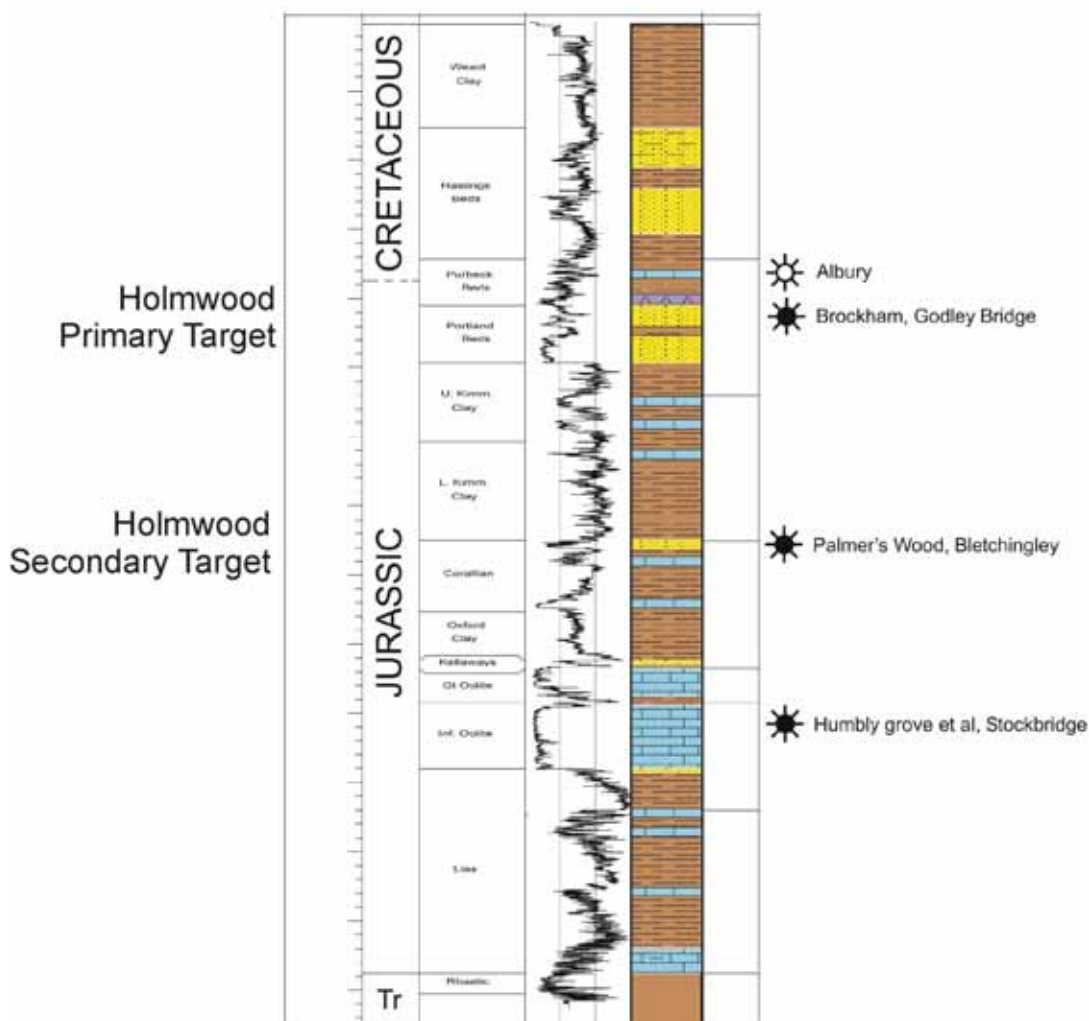
1.12 Europa Oil & Gas (Holdings) plc's shares are listed and traded on the London AIM Market. Egdon Resources (UK) Ltd. is a wholly owned subsidiary of Egdon Resources Plc, whose shares are listed and traded on the London AIM Market. Warwick Energy and Altwood are privately-owned UK exploration and production companies.

**Figure 1.1 Location of Holmwood Prospect****Exploration Potential**

- 1.13 The area applied for in Block TQ14, lies on the northern flank of the Weald Basin (**Figure 1.1**). The Weald Basin is a lozenge shaped Jurassic-Cretaceous sedimentary basin in the southeast of England which stretches from Southampton and Winchester in the west to Maidstone and Hastings in the east.
- 1.14 It is a proven hydrocarbon basin containing a number of typically small oil and gas fields mostly located on the flanks of the basin. There are currently eight producing oil and gas fields in the basin with a combined current total production of 2,000 bopd and 7.5 mmscfgpd. Electricity generation schemes for export into the national grid are common in the southern England gasfields.
- 1.15 Europa and its partners have identified, through seismic surveys, a structural prospect in the TQ14 Licence Block referred to as the Holmwood Prospect. The Holmwood Prospect has two main hydrocarbon objectives, the Portland Sandstone and the Corallian Sandstone, both Jurassic in age (**Figure 1.2**). The Portland Sandstone is the reservoir for the Brockham Oilfield which lies 2.5 km north of the Holmwood Prospect (**Figure 1.3**). The proposed well trajectory to the target is shown at **Figure 1.4**.
- 1.16 The Corallian Sandstone is the reservoir for the Palmers Wood Oilfield, 20 km to the northeast of the Holmwood Prospect. Gas accumulations, such as those reservoid in the Corallian Limestone of the Bletchingley Gasfield and the Purbeckian sandstones of the Albury Gasfield lie on trend to the Holmwood Prospect.

- 1.17 Although the Jurassic Great Oolite Beds form the reservoir in the western part of the basin, e.g. Humbly Grove and Stockbridge Oilfields, the Great Oolite Beds are expected to have low porosity and permeability in the Holmwood Prospect and are not considered prospective reservoirs.

Figure 1.2 Holmwood Prospect Targets



- 1.18 Close to the Holmwood Prospect, the Brokham and Palmers Wood Oilfields lie on the upthrown side of the main Weald Basin Fault. The Albury and Bletchingley Gasfields, like the Holmwood Prospect, lie on the downthrown side of the Weald Basin Fault. Thus, is it not known which hydrocarbon phase the Holmwood Prospect will contain and it is estimated that there is an equal probability of either gas or oil. In the Holmwood Prospect the Portland Sandstone target is expected to be encountered at 900 metres below surface and the Corallian Sandstone is 400 metres deeper at 1,300 metres. The well has been planned so the option is available to the partnership to sidetrack to the Corallian objective following evaluation of the Portland target.



Figure 1.3 Holmwood Prospect Location

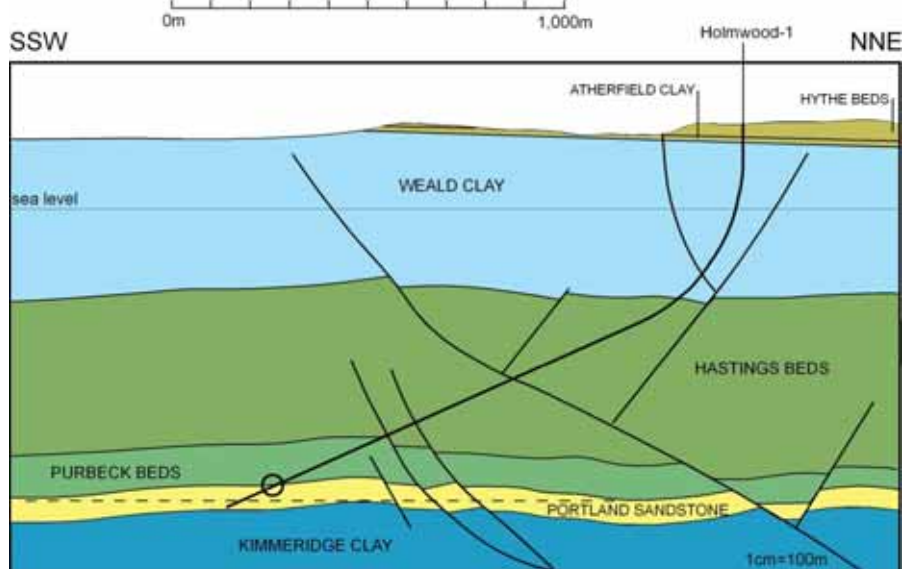
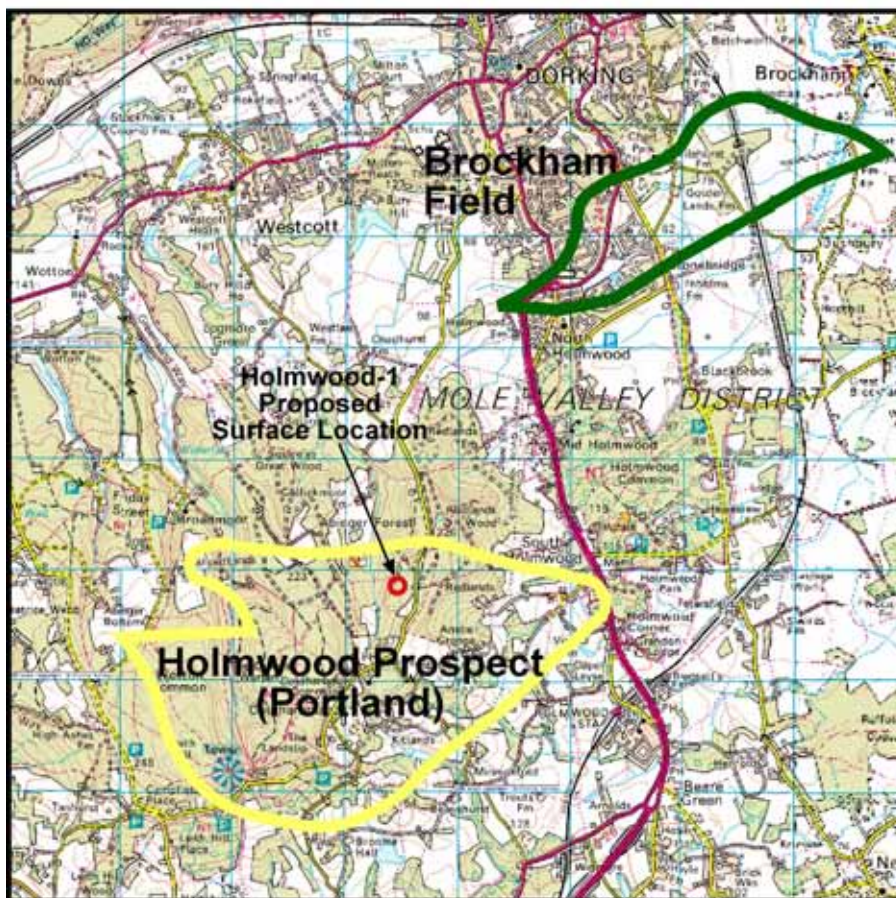


Figure 1.4 Proposed Well Trajectory for Holmwood-1



## Site Selection Process

1.19 In 2005 Europa undertook a robust review of alternative locations for the Drillsite and type of drilling necessary to access the subsurface target area. This review took full account of environmental and operational constraints which are summarised below. Given its proximity to Coldharbour village and limited access into the forest to the west, 'direct drilling' within the target area was ruled out. Operational constraints require directional drilling to be within 500-600 metres of the subsurface target zone. Six possible locations were therefore identified for further assessment. These were;

**Site A** – Collickmoor Farm

**Site B** – Coldharbour Lane West

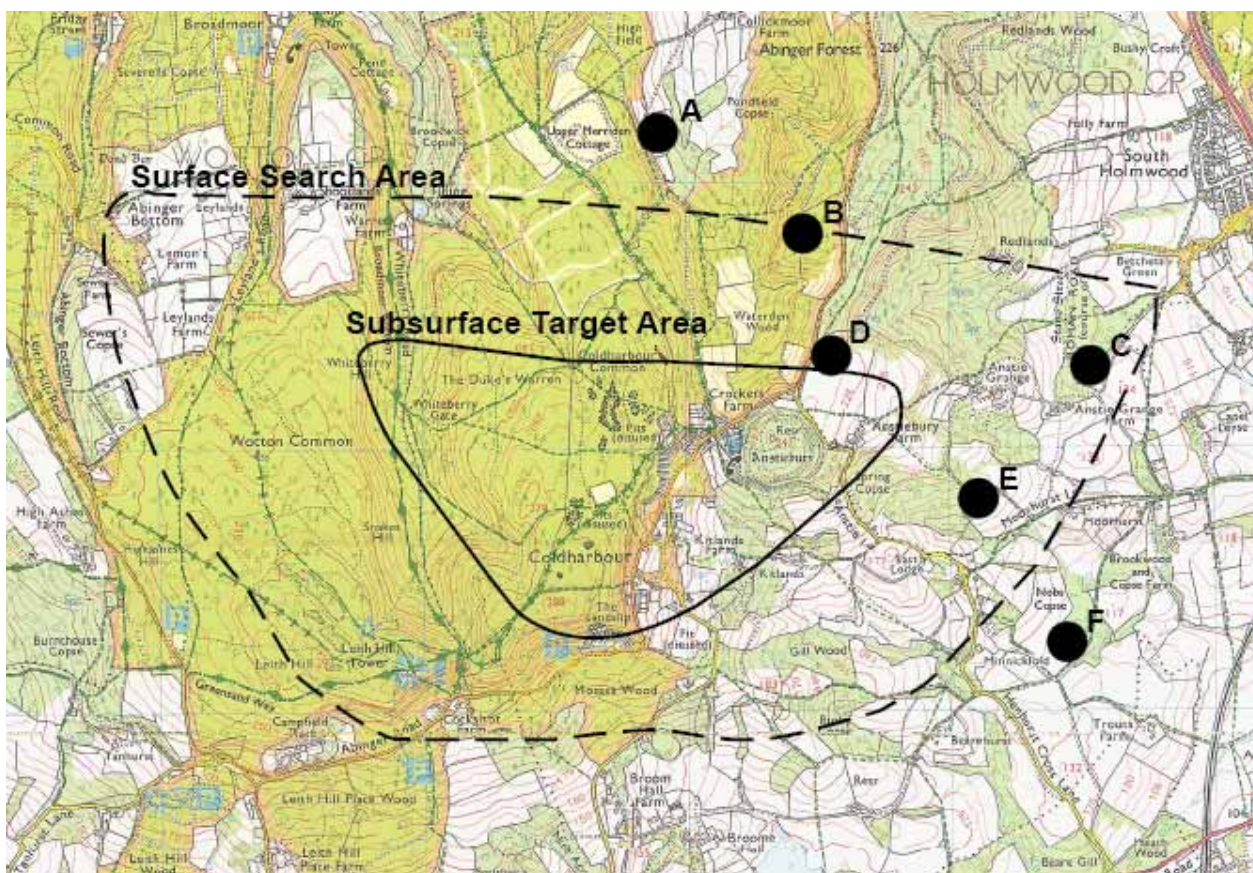
**Site C** – Anstie Grange Lane

**Site D** – Coldharbour Lane East

**Site E** – Moorhurst Lane, Beare Green

**Site F** – Nob's Copse

**Figure 1.5: Alternative Sites Assessed for the Exploratory Well**



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- 1.20 **Sites A, C, E and F** were disregarded at an early stage for the following reasons.
- 1.21 **Site A** was dependent on access from the centre of Coldharbour via the historically and ecologically important Walvens Lane, therefore discarded.
- 1.22 **Site C** raised highway safety and capacity issues furthermore operational traffic would have to pass through Betchett's Green and alongside the primary school.
- 1.23 **Site E** is a prominent position within the landscape, residential properties along Moorhouse Lane and users of the public right of way that crosses the site could be detrimentally affected.
- 1.24 **Site F** was ruled out for highway safety and access issues and for technical reasons was the least favoured as it required the longest drilling step-out with a consequent longer presence on site.
- 1.25 A systematic review of environmental issues applicable to the remaining alternatives, was undertaken for Sites B and D. This review assessed in great detail their potential environmental impacts, such as, visual impact, noise, access arrangements, residential amenity, ecology and archaeology. The assessment concluded that Site B had the least environmental impacts as the site was isolated from residential development, had an existing access onto Coldharbour Lane and fewer ecological constraints than Site D.
- 1.26 Since the assessment was undertaken in 2005, a technical review has been conducted and Europa has concluded that a conventional drillrig would be required. The new rig is larger than the one assessed in 2005 therefore requires a larger site to be accommodated. Although the revised site B is not in exactly the location that formed part of the site 2005 assessment, 50 metres to the north, it has the same attributes that led to the selection of Site B.
- 1.27 The accompanying ES has where necessary taken account of the sites revised location, for example, updates to ecological and visual impact assessments.

### **Summary**

- 1.28 The planning application for the exploratory well is supported by an Environmental Statement (ES). The ES, Appendices plus Non-Technical Summary identify the impact of the Proposed Development on the environment. The ES provides a detailed description of the Proposed Developments, comprising information in relation to the sites layout

and duration of the development. The ES also provides the data necessary to identify and assess the main environmental impacts and analysed the likely significant effects of the Proposed Development on the environment, together with a description of the measures envisaged to avoid, reduce or remedy any significant adverse effects.

1.29 This Planning Statement sets out the details of the proposed exploratory well development and should be read in conjunction with the ES and application drawings. The Statement is split into the following sections:

- Section 2 : The Site and Surroundings
- Section 3 : Planning History
- Section 4 : Description of the Proposal Development
- Section 5 : Planning Policy
- Section 6 : Appraisal of Proposed Development
- Section 7 : Conclusions

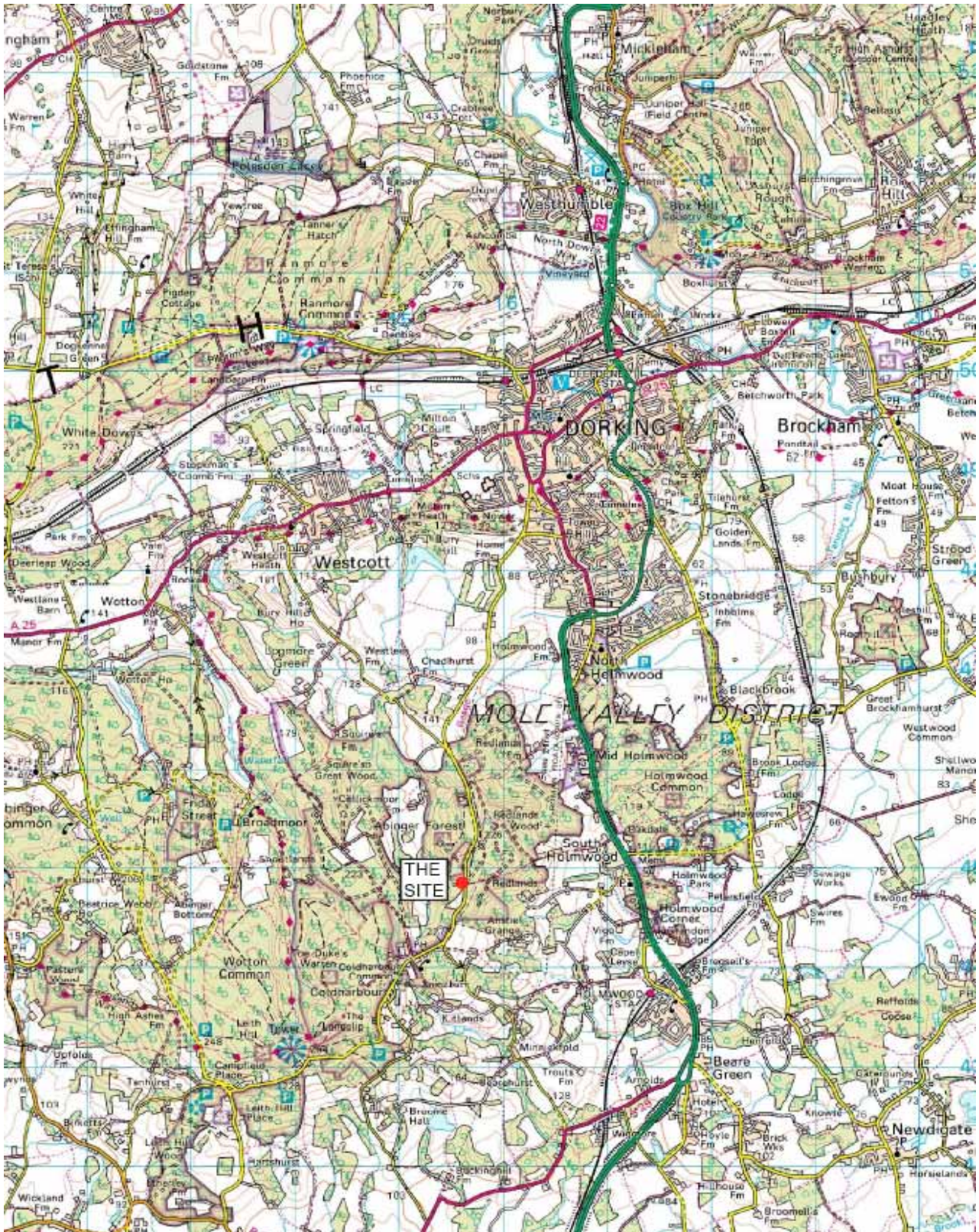
## 2.0 SITE AND SURROUNDINGS

### Surroundings

- 2.1 The site falls within the parish of Capel with the proposed access road, Coldharbour Lane forming the border between the parishes of Capel and Holmwood. Capel parish consists of Capel, Beare Green and Coldharbour and accommodates a number of National Trust and Forestry Commission sites. The parish of Capel is located off the A24 Horsham Road within Mole Valley Borough in central Surrey, see **Figure 2.1**.
- 2.2 The proposal site lies approximately 2.5km south of the North Downs, 2km south of the market town of Dorking and 14km north of Horsham, West Sussex. To the north east of the site is Reigate 10km away, London Gatwick Airport is located approximately 10km east of Holmwood and the town of Guildford is 17.5km northwest.
- 2.3 Capel and Holmwood are well served by the A24 Horsham Road which leads north towards Dorking, Leatherhead and Junction 9 of the M25 and south towards Horsham where the A24 splits into the A264 joining Junction 11 of the M23. The A24 then continues south towards Worthing and the south coast. Holmwood Station is located 2km south of Holmwood which is operated by 'Southern' and provides trains between London Victoria and Horsham via Epsom.
- 2.4 Capel and Holmwood consist mainly of forest and woodland areas with pockets of residential development located adjacent to the A24 corridor including a number of large farms. North Holmwood adjoins the built up town of Dorking whilst Mid Holmwood and South Holmwood consist mainly of the National Trust run Holmwood Common which is open to public access by permission of the owners.
- 2.5 South Holmwood accommodates a small number of residential streets at the junction of the A24 and Mill Road including Buckingham Road, Warwick Close and Folly Lane. Most residential properties are located around Holmwood Station and within the villages of Capel and Beare Green. The village of Coldharbour accommodates a small number of residences but is in proximity to a number of farms. There are several disused pits to the south west of the site, just north of the village of Coldharbour on one which is subject to this application.



Figure 2.1: Site Location



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- 2.6 The site is located within Abinger Forest in the northern quarter of Capel and on the border with the parish of Holmwood but falls within a plantation which is managed by the Forestry Commission and is known as Bury Hill Woodland. Opposite the existing site entrance is another Forestry Commission plantation which is called Redlands Wood and a series of tracks run between the two plantations which run mainly in a north-south direction through the woodlands. The site falls south of Milton Gore and is north east of Waterden Wood the latter of which is open to public access by permission of the owners, the Forestry Commission.

### Site Description

- 2.7 The proposed drill site is a disused, shallow quarry which has now become overgrown with bracken and some naturally regenerated silver birch trees, see **Figure 2.2**. The eastern boundary of the site which fronts onto Coldharbour Lane is formed by established and mature woodland which allows limited views into the site.



**Figure 2.3**



**Figure 2.4**



**Figure 2.5**

- 2.8 **Figure 2.3** shows Coldharbour Lane looking south towards Coldharbour village and **Figure 2.4** shows the entrance to Bury Hill Woodland which is the proposed drill site. **Figure 2.5** is the view north on Coldharbour Lane towards Dorking.
- 2.9 The site is accessed by Coldharbour Lane which runs south west from the A25 in the market town of Dorking approximately 3.5km away and continues south past the proposed drill site towards the village of Coldharbour where the road splits into Anstie Lane and Abinger Road. Access to the drill site would be from the existing Forestry Commission entrance off Coldharbour Lane which consists of 250m of existing track to the south western corner of the proposal site. From the proposal site the existing track

extends along the western boundary of Milton Gore and further north into Abinger Forest.



**Figure 2.6**



**Figure 2.7**



**Figure 2.8**

- 2.10 **Figure 2.6** is the existing track looking west from the entrance gate and **Figure 2.7** is the existing track looking north towards the proposal site. **Figure 2.8** illustrates the existing track looking east towards the entrance gate.
- 2.11 The planning application area includes the drill site, access track and sight lines off Coldharbour Lane which is 0.74ha (1.83 acres), see **Figure 2.9**. The entrance to the site is from Coldharbour Lane and lies approximately 600m north of the junction with Anstie Lane and 1.5km south of Logmore Lane and Boar Hill. The entrance to the access track is signposted as Bury Hill Woodland and is gated with a galvanised post and rail gate although pedestrian access is maintained either side of the gate and is often used by dog walkers.
- 2.12 From its junction with Coldharbour Lane the existing track runs west from Coldharbour Lane for 130m and continues in a south westerly direction for 70m. At this point there is a small section of track of approximately 20mx17m which could currently be used as a passing place or for storage of logs as there is evidence of recent forestry and felling activity in the plantation. This section of track is the part of the site which is closest to the village of Coldharbour. Established trees and hedgerows combined with the topography of the land obstruct views of the proposal site from the village.
- 2.13 From this point the track then bends and continues in a northerly direction where after approximately 50m it runs past the south western corner of the proposed drill site before continuing in a north north-easterly direction further into Abinger Forest.



- 2.14 The main body of the proposed drill site is roughly quadrilateral in shape and located on an area of rough, overgrown grassland which is located within Bury Hill Woodland. The site is located at a height of approximately 236 AOD on the western flank of Bury Hill, with the ground rising to the north and east into Redlands Wood. The ground of the site is relatively level but drops substantially just west of the existing access track and the site to less than 179 AOD in a valley which runs through Abinger Forest from the valley head just north of Coldharbour village to Collickmoor Farm. The valley then rises considerably from The Duke's Warren approximately 850m south west of the site, to a height of more than 270 AOD at Wotton Common and Leith Hill.



**Figure 2.10**



**Figure 2.11**



**Figure 2.12**

- 2.15 **Figure 2.10** shows the descending valley to the west of the proposed drill site and **Figure 2.11** shows a view from the existing track across the proposed drill site. **Figure 2.12** shows the site looking through the woodland from the south east.
- 2.16 The lower valley ground runs between the proposed drill site and the village of Coldharbour. Land to the north west of the site at Squires Great Wood rises to a height of 223 AOD and the topography gradually descends towards the market town of Dorking and the village of North Holmwood. Parts of Redlands Wood to the north east of the site extend to more than 226 AOD and provide dense natural screening to the drill site.
- 2.17 The nearest dwellings to the site are White Cottage, Ranmore Cottage and Ivy Cottage at the east end of Coldharbour village, adjacent to the junction of Anstie Lane and Coldharbour Lane and approximately 600m from the site. A dwelling at Lower Meridien is located on the west side of the valley, about 540m northwest of the site and approximately 35m lower in elevation. This residence is separated from the drill site by the open valley and a screen of trees immediately to the west of the site.

### **3.0 PLANNING HISTORY**

- 3.1 The site is within Bury Hill Woodland, part of Abinger Forest, commercially managed woodland by the Forest Enterprise for England, part of the Forestry Commission.
  
- 3.2 An online search of Surrey County Council and Mole Valley District Council's planning application database reveals no planning history for the site.

## 4.0 DESCRIPTION OF THE PROPOSED DEVELOPMENT

4.1 The principal elements of the Proposed Development are as follows;

- i) Site clearance involving the excavation and removal of top soil from former quarry
- ii) Temporary screening bund on the northern boundary of the site compound to store excavated top soil and any surplus excavation soil to be stored in a separate bund, up to 4 metres in height
- iii) Perimeter interceptor ditch within the compound falling to a corner sump area
- iv) Access track from Coldharbour Lane constructed using crushed stone with reptile proof fencing adjacent to it
- v) 2m high post and chain link fence around site perimeter and steel double gates at the entrance to the drilling area
- vi) A drilling rig (most likely to be BDF28 at 35m) and ancillary drilling equipment for construction of an exploratory borehole including toolpush cabin, forklift facilities, toolhouse, generators and fuel tank, matting boards, blow-out preventors and manifold
- vii) Staff car park within the compound
- viii) Concrete chamber sunk into the ground acting as a Cellar to include large diameter pipework as a starting point for drilling
- ix) Purpose built tanks for the storage of semi-dry drilling mud and rock cuttings
- x) Flare pit accommodating three specially designed Clean Enclosed Burners
- xi) External lighting to drill rig including rig floor, mud tanks and pumps, catwalk, doghouse and site cabins
- xii) Two on-site water storage tankers
- xiii) 8 portable cabins providing temporary office accommodation including essential 24-hour staff living accommodation and laboratories
- xiv) A portable skip for on-site refuse collection
- xv) Noise attenuation and dust control procedures will operate on site including effective silencers and damping down runways as the weather dictates

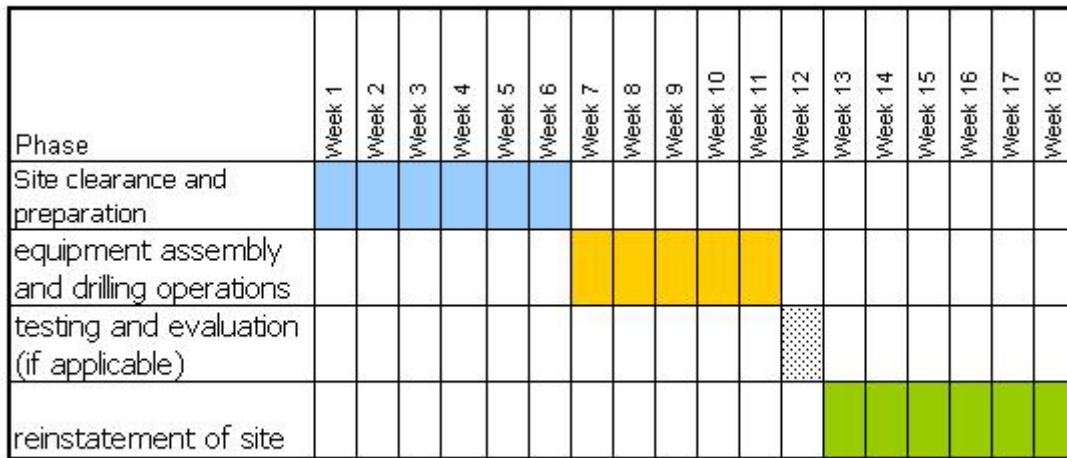
4.2 The proposal is to construct a temporary "throwaway drillsite" within an enclosed compound together with mobilising drilling and ancillary equipment / welfare accommodation to drill an exploratory borehole. Should hydrocarbons be encountered preliminary short term (no longer than 4 days) "drill stem" testing will be undertaken to assess economic viability.

4.3 Should no hydrocarbons be encountered or upon completion of the drill stem testing, all structures, buildings and enclosures will be removed and the site restored. A “throwaway drillsite” is used solely for exploratory purposes only to establish the presence or not of hydrocarbons. If economic reserves are encountered a suitably located permanent facility may be sought through a separate planning application and considered on its merits at that time.

4.4 The duration of the temporary development is programmed to last approximately 18 weeks and can be summarised in 4 Phases;

Phase 1	Site clearance and preparation	6 weeks
Phase 2	Equipment assembly and drilling operations	5 weeks
Phase 3	Testing and evaluation (if applicable)	2 days (oil) or 4 day (gas)
Phase 4	Reinstatement of site	6 weeks.

**TABLE 4.1 Development Phases and Timescale**



= maximum 4 days testing

4.5 Since availability is dependent on UK and European demands, drillrigs of the type required to excavate the borehole are not freely available and usually require a very long lead-in time. Furthermore even where a hire ‘window’ has been secured this may not necessarily materialise on schedule should problems be incurred on the site where the drillrig is currently operating. Finally, ground reinstatement can not be achieved at all stages of the year, particularly during periods when the ground may be frozen.

4.6 Therefore whilst the duration of the development is comparatively short at around 18 weeks, due to the specialist nature of the drilling equipment and its availability and the inherent nature of the oil and gas industry, the applicants seek planning permission for a 3 year window to undertake the exploration.

4.7 The four principal Phases are described below.

#### **Phase 1: Site Clearance and Preparation (Weeks 1 to 6)**

4.8 **Site Clearance:** All vegetation clearance would take place between September and February in order to avoid the bird nesting and breeding season. **Figure 2.2** displays the existing site layout. In addition, all construction, operational and restoration activity would take place outside the bird breeding season between mid May and late August to avoid any potential disturbance to breeding Nightjar. If it were to be necessary to undertake any activities between mid May and late August, the site will be checked by a suitably qualified consultant for the presence of nesting birds.

4.9 **Site Access:** details of the site access arrangements are shown on **Figure 4.1**. Access is achieved by using the existing Forestry Commission track off Coldharbour Lane, which is tarmac surfaced for the first 25 metres of its length and fitted with a steel gate. The track narrows from a splayed width of more than 20 metres to 4.5 metres wide along the stoned section beyond the barrier. Thereafter, it is stoned as far as the entrance point into the drillsite itself. No top-soil stripping will be required.

4.10 Reptile-proof fencing would be erected at the edges of and along the full length of the access road leading from Coldharbour Lane to the site compound entrance before any work start. This would consist of appropriate plastic sheeting buried into the ground and held upright by wooden batons. The fencing would prevent reptiles from accidentally straying onto the roadway and being harmed.

4.11 Stone would only be required to build up the track near the entrance to the drillsite and adjacent to a Japanese Knotweed infestation, where the track would be fenced alongside the knotweed and built up with a protective layer to prevent roots from the knotweed being picked up on the wheels of passing vehicles. The protective layer would comprise a thick plastic mat such as terram, upon which a layer of approximately 200mm depth of soft sand would be laid, followed by a layer of non-calcareous crushed stone. The crushed stone should be rolled flat to allow vehicles to pass along the roadway without any risk of veering off the surface.

- 4.12 The stoned section of the track, together with the adjoining flare area, would be formed by applying 200 mm crushed stone over a geotextile membrane to produce an even, hard surface. As both the road surface and the surrounding ground are free draining, no artificial drainage is proposed for the access roadway.
- 4.13 While the access track from Coldharbour lane is not an adopted Public right of Way (PRoW) the Forestry Commission under the terms of the CROW Act (2005) have dedicated Abinger Forest as 'open access' land. This allows, subject to temporary and permanent restrictions, such as health and safety requirements, for members of the public to access all areas of the forest.
- 4.14 To allow continued safe general public access to the forest a wooden post barrier will be erected along the vehicular access track and a sign erected at the junction with Coldharbour lane advising the public that while the access track and compound is temporally closed, open access to the majority of the forest remains, see **Figure 4.2**.
- 4.15 **Construction Traffic:** Initially there would be movement of site preparation plant comprising 3-4 low-loader articulated trucks at the outset of construction. The access and site would require approximately 3090 tonnes of stone (i.e. 155 lorry loads) delivered during a period of 3 weeks plus a few loads of ancillary construction materials/plant and 5-10 personnel movements per day. The above movements equate to an average of 1 vehicle movement every 30 minutes in either direction during the normal working day (i.e. a maximum of around 30 vehicle movements per day, 20 of which will be truck movements over the three week construction period).
- 4.16 During the three day mobilisation period of the site, HGV movements will temporarily increase to a maximum of 64 vehicle movements per day (a similar traffic increase will arise during the three day demobilisation period) as detailed at paragraphs 7.12 and 7.13 of the ES. A traffic management scheme has been prepared that addresses the combined impact of increased traffic flows and narrow roads and is considered in Chapter 7 of the ES.
- 4.17 **Compound Construction:** **Figure 4.2** displays the compound layout and **Figure 4.3** cross sectional views. The compound is largely rectangular with a maximum length (north to south) of 118 metres and width (east to west) of 55 metres. A 2-metre high post and chain link wire fence would be erected around the perimeter of the site to mark the boundaries. Off the prepared track steel double gates would be provided at the entrance to the drilling area.

- 4.18 The Site rises by 1.5 metres along the length of the site, so some soil moving operations would be required to create a level platform. The existing top-soil (nominally 150 mm in depth) would be stripped and stored (along with other topsoils from the flare area) as a temporary screening bund to a maximum height of 4 metres within the northern boundary of the site. The internal area would be levelled by cutting and filling, and any surplus excavation material would be stockpiled in a bund alongside, but separate from, the topsoil bund.
- 4.19 The total volume of soil to be moved is estimated as about 1,350m<sup>3</sup>, of which the topsoil amounts to about 850m<sup>3</sup>. The excavated subsoil will be used to build up the lower areas of the site to form the working platform. The level of the site has been chosen to get as close as possible to a balanced cut and fill, thus minimising the imbalance between the volume of excavated subsoil material and the amount required for fill. The internal site surface would be formed with crushed stone compacted on top of a geotextile layer to the specifications indicated in **Figure 4.2** and to a nominal fall to a perimeter interceptor ditch. The interceptor ditch would be 600 mm deep and 1.2 metres wide and lined with Bentomat geomembrane falling to a corner sump area.
- 4.20 Before positioning the drillrig the 'cellar' which forms an integral part of the well design and control would be constructed at site level on the location of the wellbore. The 'cellar' would comprise a reinforced concrete chamber sunk into the ground with its top surface level with the main site platform. An initial section of large diameter pipework would be built into its base to provide a starting point for the drilling operations. **Figure 4.4** displays a typical section.
- 4.21 **Hours of Operation:** During drilling operations the exploratory well site would operate continuously (i.e. 24 hours per day, seven days a week) and is discussed in Section 4.25. Deliveries, however, would be restricted to outside 'rush hours' during daytime with no night time deliveries or deliveries on Sundays and Bank Holidays. **Table 4.2** shows the proposed hours of delivery.

**TABLE 4.2 HGV Construction Delivery Hours**

Day	First Delivery	Last Delivery
Monday-Friday	09.30	15.00
Saturday	09.30	13.00
Sunday	None	None

- 4.22 Construction and site preparation hour of operation would be restricted to during daytime with no night time working or on Sundays and Bank Holidays. **Table 4.3** shows the proposed hours construction and site preparation.

**TABLE 4.3 Construction and Site Preparation Working Hours**

Day	Start Time	Finish Time
Monday-Friday	07.00	18.00
Saturday	07.00	13.00
Sunday	None	None

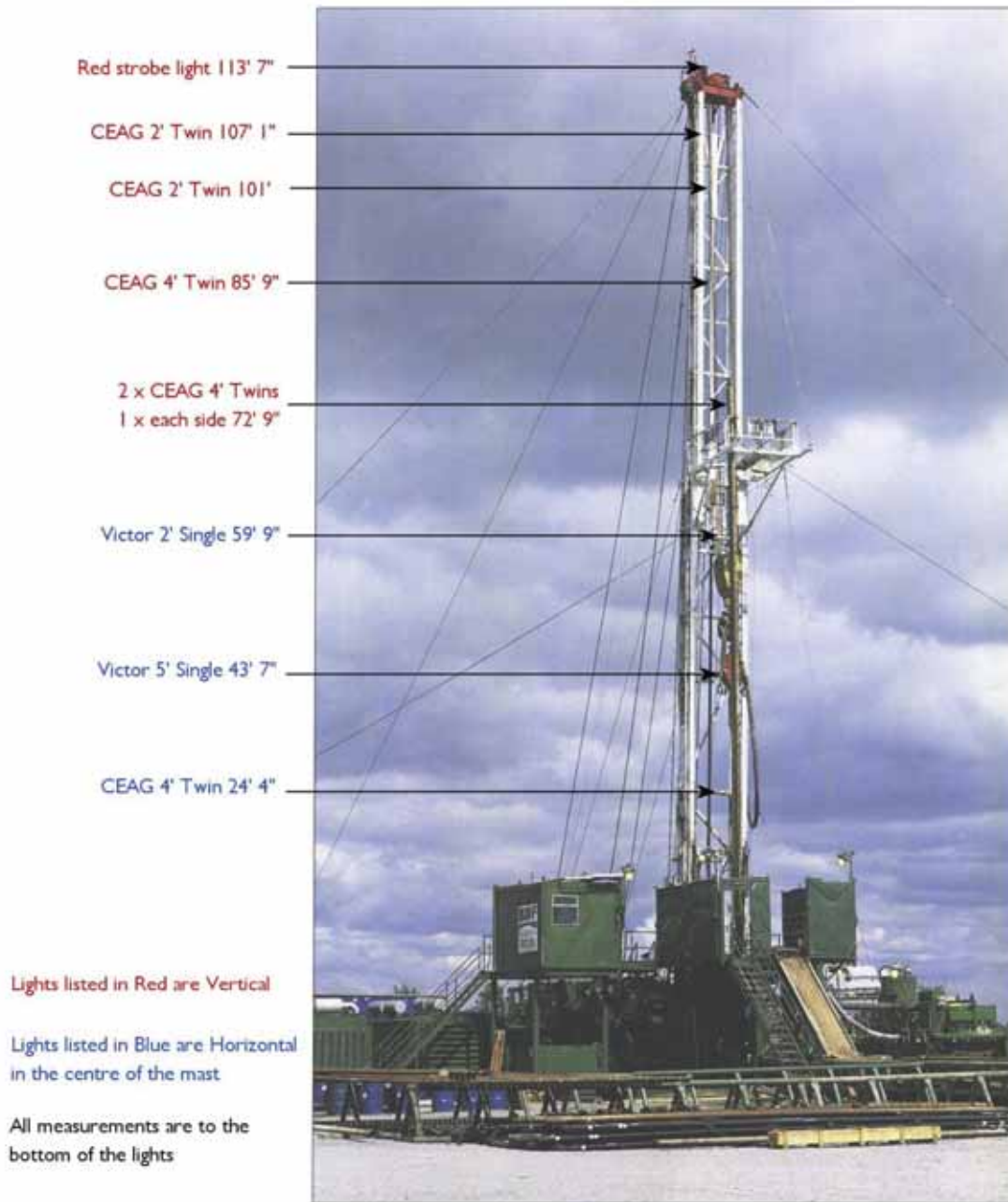
## **Phase 2: Equipment Assembly and Drilling Operations (Weeks 7 to 11)**

### **Equipment Assembly**

- 4.23 The precise specification of the drillrig would not be known until a contractor had been selected, although Europa are likely to use drilling rig **BDF28** (see **Figure 4.5**), which they have used on numerous occasions. The maximum height of the rig mast would not however, be more than **35** metres above ground level. This is the lowest drillrig capable of fulfilling Europa's requirements and has been chosen to minimise any potential issues concerning visual impact in this environmentally sensitive area.



**Figure 4.5: Drillrig BDF28 and Position of Rig Mounted Lighting**



- 4.24 All of the major components associated with the drillrig including the on-site water tanks, pipe store, mud and fuel tanks, generators, laboratories and essential 24 hour staff living accommodation including mess, shower, WC are contained within the compound. See **Figure 4.6, 4.7** and **4.3**. The design of the drill site is based on the expertise of Europa and recent projects including current UK production sites at West Firsby, Crosby Warren and Whisby Oilfields in the East Midlands. The mass and scale of the proposed drill site is dictated by the size of each component part and the processes which need to be undertaken to explore the borehole in a safe, sensitive and satisfactory manner.

- 4.25 The flare pit would be constructed adjacent to the access track, as displayed on **Figure 4.6** and **4.3**. The pit would be 12m x 6m in extent, excavated 1m below base level and surrounded by a 1.5m high bank comprising excavated sub-soil. Given uncertainties over whether gas or oil is encountered the flare area is designed to accommodate a pair of specially designed CEBs type 4500 (3m x 2.6m and 6.2m high) and one CEB Type 350 (1.1m x 1.1m and 4.1 m high) which would stand on 300 mm of stone laid within the base of the pit. In practice and should hydrocarbons be encountered, two type 4500 CEBs are required for a gas well and 1 type 350 CEB for an oil well. Trees and vegetation around the flare pit would be removed to establish a safe operating distance for the flare. Full details of the CEBs are contained in **Appendix 5.2** of the ES.
- 4.26 **Hours of Operation:** Equipment Assembly hour of operation would be restricted to during daytime with no night time working or on Sundays and Bank Holidays. **Table 4.4** shows the proposed hours construction and site preparation.

**TABLE 4.4 Equipment Assembly Working Hours**

Day	Start Time	Finish Time
Monday-Friday	07.00	18.00
Saturday	07.00	13.00
Sunday	None	None

### Drilling Operations

- 4.27 Once commenced, drilling and associated operations would be on a 24 hours per day basis over a period of 4 to 5 weeks. The drilling and casing programmes would be designed in accordance with standard petroleum industry practice, taking into account the anticipated geology, pressures and objectives of the borehole. 24 hour drilling is necessary to prevent the open hole section of the well being drilled from collapsing and therefore lengthening the operation.
- 4.28 Europa plan to drill as fast as possible to the target sections, log and test the borehole, set production casing and, if required, run a short-term (drill stem) production test (see section 4.35). The programme would be subject to Health and Safety Executive (HSE) notification and BERR approval prior to the commencement of operations. Water Supply: Water would be required for the drilling fluids whilst drilling the borehole, for dealing with the possible loss of fluids to formation in the early drilling stage and for emergency fire-fighting contingencies.

- 4.29 The supply of water, subject to agreement with Southern Water would be delivered by 5000 gallon capacity tanker to 2 on-site storage tanks. It is estimated there would be an initial requirement of up to 36,000 gallons per day (8 tanker loads) for the first 3 days of drilling reducing to 10,000 gallons per day (2 tanker loads) thereafter.
- 4.30 **Waste Disposal:** Semi-dry drilling mud and rock cuttings would be collected in purpose built tanks which would be located on either a concrete pad or in skips and transported from the site by road for disposal at an authorised waste disposal facility. The contents of the site portaloos would be removed periodically to an approved disposal site. The contents of the surface water collection ditch and compound sump would be emptied as necessary and transported by road tanker for disposal at an approved location. A portable skip for refuse collection would be provided and its contents disposed of periodically to a licensed waste disposal site.
- 4.31 **Personnel:** Normally 12 staff will be onsite during drilling operations. Staff car parking will be made available within the compound. These staff numbers will be reduced during the testing and evaluation phase.
- 4.32 **Lighting:** Drilling would be a temporary activity, taking between 4 to 5 weeks. To prevent the open hole section of the well being drilled from collapsing (and therefore lengthening the operation) the operation would need to be carried out for 24 hours per day. In order to operate 24 hours a day, lighting would be required during the hours of darkness. This lighting would not only have to comply with Health and Safety legislation and be sensitive to the area but must be of a suitable type for the installation. This means that explosion protected / flameproof fluorescent luminaires would have to be used.
- 4.33 Visible rig lighting would be divided into two types:
- High level lighting such as aircraft anti-collision lights and derrick lights (needed because a working platform is mounted on the derrick at about three quarters of the total height of the derrick); and
  - Low level lighting used to illuminate ground and intermediate level working areas. Intermediate levels are around 4 metres above ground level while the derrick might be up to a maximum of 35 metres above ground level. Most luminaires are at the intermediate level but the derrick would have a vertical row of low intensity fluorescent lights, with anti-collision lights on top.

- 4.34 The design of the rig itself and the position of the luminaires combine to not only shield the luminaires from external view but also direct the light where it is required and minimise any obtrusive light.
- 4.35 Europa has a duty under Health & Safety law to adequately light working areas to make it safe for employees. It is also essential that areas containing both moving vehicles and pedestrians are well lit, and an example of this is the racks where pipe is laid out prior to being lifted into the derrick. In order to provide as safe a working environment the majority of the luminaires use white light.
- 4.36 The position of the lights within the site and on the drillrig can be seen on **Figure 4.5, 4.8 and 4.9** and a full assessment has been undertaken in Chapter 10 of the ES. External lighting will consist of the following;

#### **Mast**

- Red strobe light at top for aircraft warning 35 metres above ground level.
- Internal mast lighting:
  - 2 x 0.6m twin 16watt CEAG Explosion protected fluorescent luminaire mounted vertically;
  - 3 x 1.2m twin 36watt CEAG Explosion protected fluorescent luminaire mounted vertically;
  - 1 x 1.2m twin 36watt CEAG Explosion protected fluorescent luminaire mounted horizontally;
  - 1 x 0.6m 16watt Victor Flameproof fluorescent luminaire mounted horizontally; and
  - 1 x 1.5m 58watt Victor Flameproof fluorescent luminaire mounted horizontally.

#### **Rig Floor**

- 4 x 1.2m 116 watt CEAG Explosion protected fluorescent luminaire to provide lighting within wind walls. 2 x 125 watt dome and 1 x 1.5m 58 watt flameproof fluorescent strip lights on Blow Out Preventers (BOP).

**Mud Tanks and Pumps**

- 8 x 400 watt flameproof dome lights and 8 x 1.2m 116 watt Explosion protected fluorescent luminaire.

**Catwalk**

- 2 x 1.2m 72 watt flameproof fluorescent strip lights.

**Doghouse**

- 1 x 400 watt flameproof dome light

**Site Lighting**

- 6 x 500 watt and 1 x 1000 watt tungsten halogen lamps mounted on site cabins.

4.37 **Hours of Operation:** As highlighted above, it is necessary for the drilling phase to operate for 24 hours per day seven days a week and for a maximum period of 5 weeks. However heavy goods vehicle movements will be restricted to those hours outlined in **Table 4.2**. 2 x 12 hours shifts will operate during the drilling phase therefore generate approximately 20 light vehicle movements around 08.00 hours and 20.00 hours.

**TABLE 4.5 Drilling Working Hours**

Day	
Monday-Friday	24 Hours
Saturday	24 hours
Sunday	24 hours

**Phase 3: Testing Operations and Evaluation (Week 12)**

- 4.38 If encountered there is an equal probability of these being either oil or gas. Should oil or gas be encountered testing is required to give an indication of the existence of producible hydrocarbons therefore a short duration DST would be carried out with the rig on location. The duration for testing is dependant on the type of hydrocarbon.
- 4.39 A gas well requires up to four days testing and high capacity 4500CEBs to flare off gas. The duration for oil well testing is less at 2 days and with a low capacity 350CEB to flare residual gas and tanks within the site to store oil. To minimise visual impact of the

flare and provide improved safety both CEBs models fully enclose the flare within the unit. The two testing programmes are outlined below. Technical specifications of the CEBs are contained in **Appendix 5.1** of the ES and **Figure 4.6** displays layout during DST, with the CEBs shown in cross section on **Figure 4.3**. If hydrocarbons are not encountered, DST will not be necessary and operations will move to Phase 4: Reinstatement of Site (see Section 4.41 below).

#### **Gas Well DST Scenario**

Day 1:- 8 hours flow- Empty contents of tubing which may have a minimum of flaring at the end of the flow.

Day 2:- 8 hours flow with flaring

Day 3:- 8 hours flow with flaring

Day 4:- 12 Hours flow with flaring

- All flaring to take place during the daytime i.e. between 07:00 and 19:00 hours.

#### **Oil Well DST Scenario**

Day 1:- 8 hours - Empty contents of tubing which may have a very low amount of gas and therefore some minimum flaring. Flaring to take place within the daytime i.e. between 07:00 and 19:00 hours.

Day 2:- 24 hours- flow and flare

- Any oil produced will be stored in tanks and taken off site in tankers to a suitably licensed facility.

4.40 Production Test and Evaluation: Since the proposed development is exploratory only, beyond the DST, no further production testing or extended evaluation of the well is to be carried out from this drillsite and the site will subsequently be restored.

#### **Phase 4: Reinstatement of Site (Weeks 13 to 18)**

4.41 Should no hydrocarbons be encountered or upon completion of the drill stem testing, the well would be abandoned by plugging the borehole in accordance with normal BERR procedures (or any subsequent revisions made by the DECC). The steel casing would be cut approximately 1.5 m below surface and capped with a steel plate. Decommissioning

of the rig would take approximately 3 days. All structures including welfare and support buildings, the drillrig, storage tanks, the well cellar and sump-lining would be removed.

- 4.42 Any remaining drilling mud and cutting waste would be removed from site along with the pit liner and perimeter ditch-lining. The perimeter fence, the hardcore laid over the site and access and the newly constructed fencing alongside the access track would be removed. The access would be returned to its original state for continued use by the Forestry Commission. The excavation of the section of roadway adjacent to the stand of Japanese Knotweed would be supervised by a suitably qualified ecologist.
- 4.44 The land would be re-graded and deep scarified in accordance with best silvicultural practice. Stored sub-soil and top-soil would be loose spread over the re-graded ground and subsoiled to relieve compaction. **Figure 4.10** displays the proposed restoration profile. The site would be re-contoured and allowed to regenerate naturally without the use of grass seed or planting and possibly replanted with trees in the future. This approach is in accordance with the Forestry Commission's felling and planting programme see **Appendix 2.3** of the ES.

### **Environmental Safety**

- 4.45 Site specific Emergency Response Procedures would be put in place in consultation with the emergency services. Drilling and any subsequent testing operations would be conducted in accordance with good oilfield practice and all relevant controlling bodies and British Standards. Should any emergency situation occur the well would be instantaneously "closed in" by means of the fitted blow-out preventors. The flare area has been so located as to be within safe working distances of vegetation and the occupied area of the drillsite. The adoption of normal emergency procedures applicable to oilfield operations would ensure compliance with the U.K. onshore environmental safety control regime.

### **Health and Safety**

- 4.46 Borehole operations would be undertaken as required by the Borehole Sites & Regulations 1995, the Management of Health & Safety at Work Regulations 1992, the Construction (Design & Management) Regulations 2007, the Offshore Installations & Wells (Design & Construction etc) Regulations 1996 and Europa's Health & Safety Manual. All construction, drilling, possible testing and restoration activities would be carried out in accordance with the U.K.'s health & safety controlling bodies.

## 5.0 PLANNING POLICY

5.1 The Surrey Minerals Local Plan (1993) is now out of date, however the CPA has advised that, together with South East Regional Minerals Strategy, it continues to form part of the development plan for future mineral development in Surrey, until the Minerals and Waste Development Framework (MWDF) is approved. Similarly, until the section of the South East Plan that covers minerals is approved, the Regional Spatial Strategy 2001 (RPG 9) and the Surrey Structure Plan 2004 continue to form part of the development plan. Regard is also given to the content of the adopted Mole Valley Local Plan (2000), Minerals Planning Statement 1: Planning and Minerals and Mineral Policy Statement 2: Controlling and Mitigating the Environmental Effects of Minerals Extraction in England.

5.2 **Mineral Policy Statement 1** (MPS1) published in November 2006 sets out the overall policy approach to minerals planning in England. It states in its introductory paragraph that minerals including oil and gas are essential to the nation's prosperity and quality of life, not least in helping to create and develop sustainable communities. Furthermore minerals development is different from other forms of development because minerals can only be worked where they naturally occur.

5.3 MPS1 identifies the important considerations, which should be addressed in Mineral Plans which amongst other matters include the safeguarding of reserves, supply, the protection of heritage and countryside and environmental protection. Annex 4 of MPS1 deals with the Governments Energy Policy and the role of onshore oil and gas developments. The Energy Policy seeks;

- to cut carbon dioxide emissions by 60% by 2050, with real progress by 2020;
- to maintain the reliability of energy supplies;
- to promote competitive markets in the UK and beyond; and
- to ensure that every home is adequately and affordably heated.

5.4 Paragraph 2.2 states that UK conventional oil and gas production off-shore will decline significantly over the coming years and that by 2020 the UK is likely to be importing around three quarters of its primary energy needs therefore in the short to medium term, the aim is to;

- maximise the potential of the UK's conventional oil and gas reserves in an environmentally acceptable manner;
- encourage the development of clean coal technologies; and



- encourage the capture of methane from coal mines where environmentally acceptable.

5.5 Paragraph 3.2 notes that conventional oil and gas development broadly consists of three phases – exploration, appraisal and production. Each phase requires a separate planning permission and there should be no presumption in favour of consent for subsequent stages if an earlier stage is permitted. Nor should possible effects of a later stage not yet applied for constitute grounds for refusal of an earlier stage.

5.6 Paragraph 3.8 states that local authority policies should indicate that, subject to the effects on the environment being properly addressed and mitigated, and a satisfactory restoration and aftercare plan prepared, applications for exploration may be favourably considered. Furthermore paragraphs 3.11 and 3.12 highlight that drilling should not be permitted close to sensitive receptors, such as, houses and early consultation with the Environment Agency is necessary to avoid the risk of pollution to ground water aquifers.

5.7 Paragraph 3.9 states where environmental or other conditions might preclude vertical drilling, MPAs should discuss with the industry the option of employing directional drilling. LDD policies should make clear that this approach will be adopted and that careful consideration will be given to factors such as:

- the need for night-time drilling for safety reasons;
- locating sites to minimise visual intrusion;
- controlling vehicular activity and vehicle routing;
- controlling the disposal of mud and other drilling residue; and
- controlling noise and light emissions from drilling rigs with particular reference to night-time operations.

5.8 **Mineral Policy Statement 2** (MPS2) published in March 2005 sets out the principles to be followed in considering the environmental effects of mineral working in order to encourage sensitive working. Technical annexes on noise and dust support that guidance in recognition that these by products of minerals extraction activity have a noticeable environmental impact. Paragraph 17 of the MPS states that applications which are in accordance with the relevant development plan should be allowed unless material considerations indicate otherwise. It goes on to advise developers that any potential adverse effects on local communities, environmental damage or loss of amenity must be kept to an acceptable minimum through the design of the proposals.

5.9 The application site is located within the Metropolitan Green Belt (MGB). In this respect, **PPG 2 Green Belts** (Amended March 2001) states that the main purpose of Green Belts is to prevent urban sprawl and encroachment into the countryside by keeping land permanently open. PPG 2 accordingly sets out five main purposes of including land in Green Belt as follows:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns from merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other land.

5.10 With regard to the use of land within Green Belts, Paragraph 1.6 of PPG 2 confirms that the following objectives can be fulfilled, once Green Belts have been defined:

- Provision of opportunities for access to the open countryside for the urban population;
- Provision of opportunities for outdoor sport and outdoor recreation near urban areas;
- Retention of attractive landscapes, and enhance landscapes, near to where people live;
- Improvement of damaged and derelict land around towns;
- Security of nature conservation interests;
- Retention of land in agricultural, forestry and related uses.

5.11 Engineering development in the Green Belt, even where temporary such as the exploratory well proposed, is regarded as inappropriate development which, by definition, is harmful to the Green Belt. PPG2 discusses, at paragraph 3.1 and 3.2 'inappropriate development' but however envisages approval of such proposals under 'very special circumstances'. It continues:

**'Very special circumstances to justify inappropriate development will not exist unless harm by reason of inappropriateness, and any other harm, be clearly outweighed by other considerations'.**

5.12 The burden is placed upon the applicant to show why permission should be granted and to put forward those 'other considerations' and very special circumstances which warrant an exception being made to normal policy. In the case of the temporary exploratory well proposed the 'very special circumstances' may be summarised as:

- (i) Oil and gas reserves are acknowledged in Government guidance to be essential to the nation's prosperity, quality of life and such resources help to create and develop sustainable communities. Exploration plays a vital role in this process.
- (ii) Continued UK exploration for oil and gas is essential to help meet the decline in conventional supplies to meet future demands and ensure security of supply.
- (iii) Within the context of this application, the use of the land is for exploratory purposes and is for a temporary period of 18 weeks only, after which the site will be fully restored.

5.13 **Planning Policy Statement 9** (PPS9) on Biodiversity and Geological Conservation sets out the policies that apply to the integration of the protection of biodiversity and geological conservation and planning. The Government's objectives for planning are to promote sustainable development, conserve, enhance and restore the diversity of England's wildlife and geology and contribute to rural renewal and urban renaissance. Para 10 of PPS9 covers the value of ancient woodland as a biodiversity resource both for its diversity of species and longevity as woodland.

5.14 **Regional Planning Guidance for the South East** (March 2001) covers the period up to 2016. **RGP9 - Amendments to Chapter 11 (Minerals)** were published in June 2006 following public consultation. The alterations to Chapter 11 replace the text of Chapter 11, paragraphs 11.1 to 11.13 as found in RGP9 published in March 2001. This sets out the South East Region's mineral planning policy and the core strategy for minerals as set out at paragraph 11.15 is to meet identified need for mineral supply in the region by making efficient use of natural resources having regard to:-

- Safeguarding the region's naturally occurring minerals and encourage the use of suitable alternative construction materials where appropriate;
- Protecting the environment and local amenity;

- Minimising the adverse impact of the transport of minerals and construction materials.

- 5.15 Whilst there is no specific regional policy regarding hydrocarbons, the revised RPG 9 acknowledges at paragraph 11.59 that 'oil is currently being extracted under Hampshire'. Paragraph 11.60 highlights it therefore as important that MPAs with such resources within their areas consider these resources as part of their preparation of local development documents.
- 5.16 The Region has a wide range of habitats and Policy E2 of the Spatial Strategy seeks to maintain and enhance the Region's biodiversity. Policy E5 states that woodland habitats should be increased whilst protecting the biodiversity and character of existing woodland resources and other areas of established or potential nature conservation value. The RSS states that through land use planning and other functions, local authorities have the opportunity to improve air quality and Policy E7 requires that when determining planning applications, *'air quality is taken into account where appropriate, along with other material considerations'*.
- 5.17 On commencement of the Planning and Compulsory Purchase Act 2004, all existing adopted local plans and relevant structure plans were automatically saved for 3 years. As the progress for adoption of new development plans has not progressed at the speed envisaged in the Act, Local Planning Authorities wishing to retain specific policies beyond the expiry of the above mentioned 3 year period i.e. 27 September 2007, needed to receive the Secretary of State's agreement in the form of a direction to save such policies until the Local Development Documents are in place.
- 5.18 Policies not listed in the Secretary of State's Direction letter regarding a particular local plan or structure plan, expired on 27 September 2007. The policies referred to below are saved policies as confirmed in the Secretary of States letter of: 21 September 2007 regarding the Surrey Structure Plan to the South East England Regional Assembly; 21 September 2007 regarding the Surrey Minerals Local Plan to Surrey County Council; and 25 September 2007 regarding the Mole Valley Local Plan to Mole Valley District Council.
- 5.19 The **Surrey Structure Plan** adopted in December 2004 covers the period to 2016 and provides the strategic planning framework for the County. There are a number of policies relevant to the proposals including Policy SE1 dealing with 'Natural Resources and Pollution Control'. The policy states that designated areas and features of acknowledged importance within the natural environment should be conserved and enhanced. Development should therefore be located and designed to promote the

efficient use of energy and water and the careful use of natural resources, including land and soils.

- 5.20 Development must further comply with prevailing standards for the control of emissions to air, water and land. The policy additionally states that the planning authorities will not permit development which, by reason of noise, odour, radiation or light pollution, would be harmful to the environment or to other land users in the area and will, therefore, avoid locating sensitive development in the vicinity of known sources of pollution or hazard.
- 5.21 Under Policy SE5 development site over 0.4 hectares or within areas of high archaeological potential will require an archaeological assessment, and if necessary evaluation. Where important archaeological remains are found, there will be a preference for their preservation in situ.
- 5.22 Policy SE6 seek to conserve and enhance biodiversity. Development will be expected to contribute to safeguarding and managing habitats identified as important through the UK and Surrey Biodiversity Action Plans, or where they are protected by wildlife legislation. Protection will be secured through appropriate site evaluation and where necessary mitigation.
- 5.23 Policy SE8 and LO4 considers Areas of Outstanding Natural Beauty (AONB) and Areas of Great Landscape Value (AGLV) highlighting the openness and intrinsic qualities of the countryside will be protected from inappropriate development. However, there are exceptional circumstances where development is permitted subject to adverse impacts being satisfactory managed. These acceptable developments include minerals workings and other essential utility development. This is reinforced by Policy DN17 highlighting that mineral workings in the Green Belt and AGLV are acceptable providing that the need for the mineral is established and the environmental impact is acceptable. This policy is equally relevant to proposals for exploration, particularly where restoration is proposed as part of the environmental mitigation.
- 5.24 Policy SE9 seeks to protect and manage tress and woodlands, particularly ancient woodlands, highlighting the extent of tree coverage in the county should be maintained. Development associated with the positive long term management of woodland resources, such as wood to energy schemes or the processing of local wood, will be encouraged.

- 5.25 Under Policy DN2 development will only be permitted where it can be demonstrated that it is or can be made compatible with the transport infrastructure and the environmental character of the area and meets current design standards.
- 5.26 The **Surrey Minerals Local Plan** was adopted in 1993. Policy 1 'Environmental and Amenity Protection' requires that the MPA be satisfied that steps have been taken to minimise the impact on amenity and environment.

**"Mineral working will be permitted only where the County Council are satisfied that adequate safeguards for the protection of the environment and the amenities of local residents can be secured. In considering such proposals the County Council will wish to be satisfied that steps have been taken to minimise the impact of working and in particular that the following matters have been taken into account:-**

- (a) **implications for the health and safety of the public;**
- (b) **impact on amenity (including the potential effects of noise, fumes, vibration, glare and dust);**
- (c) **visual impact and effect on landscape;**
- (d) **traffic generation, its impact and the suitability of the public highway;**
- (e) **effect on the flow and quality of groundwater, surface water, land drainage, and flooding;**
- (f) **potential danger to aircraft (birdstrike);**
- (g) **impact on nature conservation;**
- (h) **impact on agriculture and forestry;**
- (j) **impact on existing or potential recreation use;**
- (k) **the restoration of the site and the after-use proposed;**
- (l) **impact on archaeology and historic landscape;**
- (m) **scope for limiting the duration of working."**

- 5.27 In terms of noise, Surrey County Council has produced its own 'Guidelines for Noise Control Minerals and Waste Disposal 1994', based on the approach in Mineral Planning Guidance Note 11 (MPG11). MPG11 has now been superseded by Mineral Planning Statement 2 (MPS2) but the advice in terms of noise remains consistent with MPG11 and the Surrey Guidelines.

5.28 MLP recognises that the issue of traffic gives rise to a great deal of concern. The supporting text states that the MPA will wish to be satisfied that the volume and characteristics of the traffic generated by a proposed development would not have an unduly adverse impact on the locality and on the highway network.

5.29 Paragraph 5.16 states "In Surrey exploratory drilling has already been undertaken in the Green Belt, the Surrey Hills AONB and an Area of Great Landscape Value without any marked detriment to the environment".

5.30 Policy 15 States;

**"Proposals for drilling operations for hydrocarbons whether for exploration, testing to locate and determine the nature and extent of resources or for the production of hydrocarbons will be permitted only where the County council are satisfied that in the context of the geological structure being investigated the proposed site has been selected so as to minimise the environmental and ecological impact of the development".**

5.31 The **Mole Valley Local Plan** was adopted in October 2000 and contains the Council's planning policies against which new development will be assessed. While the Mole Valley Local Plan does not contain policies dealing specifically with oil and gas exploration, the site is identified as lying within countryside beyond the Green Belt thus Policy ENV3 of the Plan states that :

**"In the rural areas not covered by the Green Belt .... the countryside will be protected for its own sake and development adversely affecting its open character will not be permitted.**

**Development within the countryside beyond the Green Belt will only be acceptable for the reasonable needs of agriculture and forestry or comprises essential facilities for outdoor sport and outdoor recreation, mineral extraction and waste disposal.**

**Other development in the countryside beyond the Green Belt ...may be acceptable provided the relevant policies in the Plan are satisfied.**

**... All development must be appropriate in scale, form, impact and siting."**

5.32 Policy ENV 4 (Landscape Character) and ENV 6 (Area of Great Landscape Value (AGLV)) complement ENV3 indicating that inappropriate development within the countryside and AGLV that detracts from and are inconsistent with an areas distinctive landscape character will not be permitted.

5.33 The site is located within Surry Hill Area of Outstanding Natural Beauty. Policy ENV 5 specifically relates to AONB stating;

**The Surrey Hills Area of Outstanding Natural Beauty is of national importance and will be subject to the most rigorous protection. Development inconsistent with the primary aim of conserving and enhancing the existing landscape character will not be permitted. Small scale development for the reasonable needs of agriculture, forestry or outdoor recreation as well as that in support of services for the local community will normally be acceptable in the AONB provided that proposals conserve the landscape character and are in accordance with the policies of this Plan.**

5.34 In terms of species and habitat protection Policy ENV15 requires thorough site investigation and where they would be materially harmed development will not be permitted

5.35 Policy ENV50 seeks to ensure development sites of over 0.4 hectares that are outside areas of high archaeological potential are subject to a desk based assessment to identify the potential of the site to contain significant archaeological remains.

5.36 Paragraph 4.244 highlights that lighting proposals can have a significant adverse effect on residential amenities or the character of the countryside and where lighting is not appropriately controlled adverse impacts such as 'sky glow' can occur. Policy ENV 55 seeks to prevent such adverse impacts and where they can be demonstrated to be



acceptable the LPA should consider imposing conditions to limit the impact of illumination.

5.37 Drainage and surface water runoff from development sites is considered by Policies ENV65 and ENV66 respectively. These policies seek to ensure adequate capacity exists to cater for foul and surface water that would be generated by a proposal and not increase flood risk.

5.38 Paragraph 4.283 states that groundwater resources are an invaluable source of water for public supply, industry, agriculture and sustaining river base flows. Paragraph 4.284 goes on to highlight that the northern part of the district is underlain by at least two major aquifers that supply potable water. Therefore Policy 67 and Policy 68 seek to protect groundwater water and the aquifers from inappropriate development that would detrimentally effect its quality or have an adverse impact on river flows, amenity or nature conservation.

## 6.0 APPRAISAL OF PROPOSED DEVELOPMENT

- 6.1 The Proposed Development is for the construction of a temporary compound to house a drillrig to undertake hydrocarbon exploration and if necessary short term DST. In total, the development including site preparation, drilling, testing and restoration will last approximately 18 weeks. However given the nature of the oil and gas industry with a reliance on hired drilling and ancillary equipment, Europa have applied for a window of 3 years to undertake the development. Once complete the site will be restored and allowed to naturally regenerate as part of the wider forest. This approach to restoration is consistent with the Forestry Commission's natural regeneration Felling Programme for Abinger Woods.
- 6.2 In assessing the Proposed Development, regard is given to the content of the Plans and Policies set out in Section 5 of this report. The Proposed Development has been assessed under the Environmental Impact Assessment (EIA) Regulations and the results of this are set out in the Environmental Statement (ES) which accompanies this application. Policy 15 of the Minerals Local Plan requires hydrocarbon exploration developments to be sensitively selected to minimise the environmental and ecological impacts of the development therefore the criteria of policy 1 (MLP) have been used and the following paragraphs give an overview of the impact of the Proposed Development on the local environment and local amenity.
- 6.3 **Implications for the health and safety of the public and Impact on amenity:** The Site is remote, the closest residential property is over 500 meters to the south in Coldharbour therefore no demonstrable impacts to residential amenity are anticipated. In the interests of health and safety, for the duration of the development 'open access' permitted under the CROW Act will be suspended across the entire Site. A secure fence/advisory signs and occupation of the site 24 hours a day during drilling and if necessary drill stem testing will provide a significant deterrent to unauthorised entry and protection of the general public.
- 6.4 Europa has successfully and without incident undertaken UK onshore hydrocarbon drilling over the past 6 years. Site specific Emergency Response Procedures would be put in place in consultation with the emergency services. Drilling and any subsequent testing operations would be conducted in accordance with good oilfield practice and all relevant controlling bodies and British Standards. Should any emergency situation occur the well would be instantaneously "closed in" by means of the fitted blow-out preventers.

- 6.5 The site has been selected to be away from noise sensitive properties to minimise disturbance. The noise analysis indicates that plant should operate within acceptable thresholds and no significant impacts will occur that require a formal scheme of mitigation. However site construction, drilling and decommissioning will be carried out in accordance with BS5228 so all plant will be correctly maintained and sound attenuation used correctly.
- 6.6 Construction activities and decommissioning will take place during the day time and not on Saturday afternoons, Sundays nor Bank Holidays to minimise disturbance. Wherever practicable top soil mounds will be positioned to reduce site noise emissions to the south and west. Appropriate noise monitoring to ensure compliance with planning conditions will be agreed with the local authority and undertaken and any noise levels that exceed the noise limits will be notified. Therefore the development would not give rise to unacceptable noise levels to the detriment of nearby residential properties
- 6.7 Exhaust emissions of Nitrogen Oxides and Carbon Monoxide from the CEBs will not exceed UK Air Quality Standards therefore not pose a health risk to the closest residents, some 500 meters away or passing recreational forest users.
- 6.8 The principal potential dust source has been identified as site haulage during the preparatory/construction and restoration works. Soils handling may also give rise to visible dust emissions. To minimise impacts measures will be employed to protect the amenity of recreational users of Bury Hill Woodland and are outlined below;
- All running surfaces would be maintained in a clean condition.
  - All mobile plant would be fitted with radiator fan deflector plates and speeds limited.
  - Operations would be suspended in very dry windy conditions.
  - Dust control would be maintained during operations but as all running surfaces would be hard surfaced, damping down would be expected to provide sufficient control.
  - During the construction period when the access road is being surfaced, a road sweeper will be deployed on Coldharbour Lane to keep the highway in a clean condition.
- 6.9 The above measures would sufficiently minimise the likelihood of dust emissions being released during construction and restoration phases.

- 6.10 **Visual impact and effect on landscape:** The site is within Surrey Hills Area of Outstanding Natural Beauty (AONB) and forms part of an extensive area of wooded access land with a well-used network of rights of way and publicised recreational routes that provide potential opportunities for views towards the site. Effects would be due principally to the height of the rig, its engineered character and the effects of associated lighting in generally unspoilt rural views from within the Surrey Hills AONB.
- 6.11 **Rig:** Due to the screening effects of intervening buildings, dense and extensive woodland cover, undulating topography and distances to sensitive receptors, very few residential properties, recreational routes or roads would experience any views of the rig at all. Where views are available they are distant or only marginal. There no significant detrimental effects identified from any of the selected viewpoints assessed within the ES arising from the drilling rig or CEBs, due to the limited level or magnitude of changes in existing views and to their short term, temporary nature. Nor would there be significant effects in views from Coldharbour village, the Greensand Way, or the North Downs National Trail. Therefore it is considered that in terms of daytime visual impact, no demonstrable impacts will be experienced.
- 6.12 **Lighting:** It is acknowledged that the site is within an E1 Environmental Zone 'intrinsically dark landscape'. During the construction, operation and decommissioning phases, the principal lighting impacts are likely to be associated with the need for temporary lighting associated with the illumination of temporary car parking areas, the contractor's compound and work areas (including the rig lighting) during the drilling and if required the DST phase. The duration of these two phases is less than 6 weeks of the 18 week programme.
- 6.13 In order to mitigate such temporary impacts on surrounding sensitive receptors the lighting requirements at the Site during the construction, operation and decommissioning phase will be managed as part Lighting Management Plan. Installed lighting will involve the use of well located, modern light fittings which are directionally controlled and will be in accordance with current best practice standards for light pollution (taking into account the necessary luminance for health and safety and security purposes) and County Planning Authority requirements.
- 6.14 Light spill will not extend a significant distance from the site boundary due to the screening afforded by the soil bunds, equipment, compound area and coniferous trees. The temporary lighting will be specific to those areas of the Site that require illumination during the night-time period to ensure both on-site safety and security while ensuring that the effects of light spill, glare and sky glow towards sensitive

receptors are effectively mitigated. Due to its remote location residential properties will not experience light spill within their curtilage.

- 6.15 The residual effect of lighting on sensitive receptors during the construction, operation and decommissioning phases will be short term and temporary in nature and considered to be of negligible significance in terms of light nuisance.
- 6.16 Overall it is considered that visual impact and effect on landscape of the Proposed Development would not give rise to significant negative impacts on the character and quality of the wider landscape.
- 6.17 **Traffic generation, its impact and the suitability of the public highway:** The site utilises an existing Forestry Commission track which is adequately sized to cater for articulated vehicles. Providing some low-level vegetation is cleared along the southern sightline no further modifications are necessary to enable safe access and egress from the public highway.
- 6.18 The proposal will lead to a short term increase in HGV movements on the public highway. It is anticipated to generate an average of about 20 HGV movements per day during its busiest phase, site construction and in terms of capacity this represents less than 10% additional vehicle movements on along Knoll Road and Coldharbour Lane. However given the variable highway widths along Knoll Road and Coldharbour Lane and a view to limit impacts to residents of Coldharbour village, a Traffic Management Plan (TMP) will be implemented. Full details of the TMP can be found in **Appendix 7.4** of the ES and the main management methods are outlined below;
- HGV Vehicle routing from the A29 to the site, no HGV movements via Coldharbour village.
  - Controlled delivery times for HGVs - restricted to between the hours of 0930 and 1500 on weekdays.
  - Active traffic management for sections of the public highway that do not allow an HGV and car to pass (See **Figure 5.3**) for example unmanned traffic lights and banksman control.
  - prior warning to residents along the route and notification of the public by temporary road signs
- 6.19 Considering the short duration of the development and subject to the implementation of the TMP no demonstrable impacts are anticipated.

6.20 **Effect on the flow and quality of groundwater, surface water, land drainage, and flooding:** Construction to form the compound and subsequent restoration would require excavation of sub and top soil deposits. This involves the use of diesel powered plant. During operation (drilling and DST) diesel generators will power the drillrig and the well will penetrate the Lower Greensand aquifer as it travels towards the targets. Drill mud will be pumped down the well to stabilise it and if necessary flow testing will be undertaken. Such operations present a risk to surface water quality as any spillages of fuels or other potentially contaminating liquids could migrate to surface waters, either directly in the event of spillages at ground level or via subsurface pathways, in particular the Lower Greensand aquifer.

6.21 In order to mitigate the risk of surface or groundwater pollution occurring during the construction, operation and restoration, the following management measures would be included:

- Wherever necessary a traffic management system would be put in place to reduce the potential conflicts between vehicles and thereby reduce the risk of collision;
- Maintenance of plant and machinery would be undertaken within the site compound or off-site, as appropriate, to minimise the risk of uncontrolled release of polluting liquids;
- Stationary Vehicles on the partly built site would have drip trays positioned under them to catch oil drips.
- All fuel tanks would be double skinned and any refuelling of machines would be carried out within a contained area to avoid spillage of fuel onto the ground.
- The compound will be fully sealed to prevent any spills escaping from the site as surface water runoff or directly into the Lower Greensand. It provides sufficient capacity for a hypothetical situation where oil flowed uncontrolled from the wellhead at a rate of 50 barrels/day for 30 days (57,000 gallons or approximately 260,000 litres).
- All rainwater runoff, spills, fluids and drill mud collected within the sealed compound will be taken off site by sealed tanker for disposal at an appropriately licensed facility.
- An independent examiner will review the Well Programme to ensure it meets health, safety and environmental requirements.

- 6.22 The site is at little or no risk of flooding from groundwater, fluvial, coastal or tidal sources. A review of the Environment Agency's website indicates that the site lies within Flood Zone 1 'low probability', where the annual probability of flooding is considered to be less than 0.1%. PPS 25 – Development and Flood Risk, suggests that the appropriate planning response for developments in Flood Zone 1 is one of no constraints due to flooding, with all uses of land appropriate in this zone.
- 6.23 While the Environment Agency raised no objection during pre-application correspondence (see **Appendix 2.2** of the ES) they did highlight, to prevent pollution of the water environment a statement of the method of working for borehole construction should be submitted. Such measures can be secured by an appropriately worded condition on any planning permission.
- 6.24 Overall, it is considered that subject to the implementation of mitigation measures highlighted above the effect of the Proposed Development on the flow and quality of groundwater, surface water, land drainage, and flooding is acceptable.
- 6.25 **Potential danger to aircraft (birdstrike):** Open water bodies do not form part of the proposal therefore it is not considered that the Proposed Development will increase the potential for birdstrike within the area.
- 6.26 Consultation with BAA, National Air Traffic Services Ltd and the Directorate of Airspace Policy has confirmed that the drill rig for a temporary period of 18 weeks, would not have an adverse effect on the safe and efficient operations of Gatwick Airport therefore raise no objection to the proposal.
- 6.27 **Impact on nature conservation:** There are no features of conservation interest with International biodiversity value, either within the Development Site, or within 2km of the Site. Leith Hill SSSI and 3 local Sites of Nature Conservation Interest are within 2km of the site however degradation of their habitats, breeding bird or invertebrate populations as a result of the construction, operation and restoration phases of the proposed development would not occur.
- 6.28 Although last recorded appearance was in 1989, Nightjars have been recorded breeding approximately 900m to the west and while habitats within the Development Site are unsuitable for nesting, it could provide foraging opportunities. To ensure the proposed development does not detrimentally affect Nightjars or other breeding birds of local value, Europa proposes to undertake the development outside of the bird breeding season (March to August).

- 6.29 However should operational requirements, such as drillrig availability impinge upon the bird breeding season, a suitably qualified ecologist will undertake a survey to identify any breeding Nightjars within 500m of the site and check the site for other nesting birds prior to the commencement of development. Should it become necessary appropriate mitigation will be undertaken in consultation with the CPA and Natural England.
- 6.30 While the site does not contain suitable habitats to support reptiles, such as, Adder and Common Lizard the low numbers reported within the forest may occasionally use the site access forestry track for basking, therefore reptile proof fencing will be provided along its length.
- 6.31 To safeguard against proliferation of Japanese Knotweed, measures will be in place along the access track to minimise the risk of spreading rhizomes by providing a stable hard surface and fencing as detailed in paragraph 4.8.
- 6.32 Further details of the environmental assessment of the proposal on ecology are contained within Chapter 8 of the ES.
- 6.33 **Impact on agriculture and forestry:** Abinger Forest is an Ancient Replanted Woodland, a site listed on the Ancient Woodland Inventory for Surrey. The proposal would involve the temporary loss of less than 0.74Ha of replanted woodland which represents approximately 1.5 % of Abinger Forest or 0.02% of the 2,738ha of replanted ancient woodland in Surrey.
- 6.34 Although within an Ancient Woodland the Site does not contain any ancient trees, nor dead or dying timber, and the seed bank, comprising any ancient woodland ground flora, will be stored (in bunds) and restored following decommissioning, therefore the loss of habitat is temporary only. Furthermore, the removal of the thick cover of Bracken from the site may allow any woodland ground flora seeds present in the topsoil that are currently dormant to germinate following reinstatement, a benefit to local biodiversity.
- 6.35 The site is within a commercial forest managed by the Forest Enterprise, a division of the Forestry Commission. Europa's proposal to allow the site to naturally regenerate once the soils are replaced is in accordance with the Forest Enterprise's current Felling Programme (See **Appendix 2.3** of the ES). Therefore while a temporary disturbance of the forest habitat within the site will ensue the proposed development will not result in a permanent detrimental loss of forest.



- 6.36 **The restoration of the site and the after-use proposed and scope for limiting the duration of working:** On completion of the drilling and testing phase all structures including welfare and support buildings, the drillrig, storage tanks, the well cellar and sump-lining would be removed. Any remaining drilling mud and cutting waste would be removed from site along with the pit liner and perimeter ditch-lining.
- 6.37 The land would be re-graded and deep scarified in accordance with best silvicultural practice. The access track will be returned to its original state. Stored sub-soil and top-soil would be loose spread over the re-graded ground and subsoiled to relieve compaction. While no formal planting scheme is proposed as part of this development the site which lies within a commercial forest will be allowed to naturally regenerate in accordance with the Forestry Commission felling programme (see **Appendix 2.3** of the ES). In context with a commercial forest the proposed approach to final long term restoration is considered acceptable.
- 6.38 While the duration of the proposed development is short at approximately 18 weeks a three year window of opportunity is required by Europa to acquire all necessary equipment to undertake the development in a safe and considerate manner.
- 6.39 **Impact on archaeology and historic landscape:** The site does not contain, impinge upon, or affect the setting of, any of the following: -
- Scheduled Monuments
  - World Heritage Sites
  - Registered Battlefields
  - Registered Parks and Gardens
- 6.40 The SMR shows only 1 entry within a radius of a kilometre from the site. This is: - SMR Number 20186, TQ1535, Anstiebury Camp. While records within the SMR are very limited for this area it is likely to be a reflection of the lack of development and any consequential archaeological investigation that has occurred. However by its very nature the topography of narrow valleys and steeply contoured hills with dense tree cover would have been a prohibiting factor for early settlement and development of land.
- 6.41 In addition to the above the ES concludes that;

- Historic map evidence commencing in the seventeenth century shows that the site has historically been heavily forested or used as a field.
- The results of the photographic survey indicate that the proposed development will have no visual impact on Scheduled Monuments, Listed Buildings, areas of high archaeological interest or Conservation Areas.
- The results of the topographical survey indicate that the pits/quarries within the area were probably local and not managed on an industrial scale therefore are regarded as of minor importance.
- No artefacts, standing structures or earthworks were observed within the site during the walkover survey.
- Unknown archaeological deposits that may have been present on the site are likely to have been severely truncated by logging activities

6.42 In summary, the site is considered to be of very low archaeological potential and without detriment to the historic landscape, therefore not contrary to policy 1 of the MLP. Given this conclusion no further archaeological investigations are considered necessary.

## 7.0 CONCLUSIONS

- 7.1 This application seeks planning permission for the construction of an exploratory well and subsequent drill stem testing if hydrocarbons are encountered. The development including restoration will last for approximately 18 weeks and a 3 year 'window' has been applied for to undertake the development.
- 7.2 Oil and gas are essential both to the nation's prosperity and quality of life and these resources help to create and maintain sustainable communities. Continued UK exploration is essential to meet the decline in conventional supplies, to meet future demands and ensure security and continuity of supply. The national objectives for minerals planning, *inter alia*, seek to ensure the prudent, efficient and sustainable use of minerals and to secure adequate and steady supplies of minerals needed by society and the economy within the limits set by the environment.
- 7.3 The Energy White Paper advises at paragraph 6.37 that the Government is committed to maintaining an active and successful oil and gas industry in the UK and to promoting future development of the nation's oil and gas reserves. The Government accordingly are committed to encouraging investment in both existing and new fields via its PILOT initiative which, *inter alia*, seeks to;
- prolong self-sufficiency
  - maintain production levels of 3 million barrels of oil equivalent per day.
- 7.4 The exploratory well site lies within the Green Belt and an AONB, wherein there is a general presumption against development, unless very special circumstances can be demonstrated. In this respect, the very special circumstances case, advanced by the applicants, is predicated on the need for continued UK hydrocarbon exploration, as confirmed by Government guidance, expressed in MPS1 and the Energy White Paper.
- 7.5 With regard to mineral extraction proposals within AONB's and the Green Belt, MPS 1 notes, at paragraph 14, that major mineral developments should not be permitted within AONB's except in exceptional circumstances. Accordingly major proposals should demonstrate that they are in the public interest if they are to proceed. However it is submitted that the proposed exploratory well, by virtue of its compact scale and temporary nature, is not a major minerals proposal. Notwithstanding, the proposals are still in the public interest in the context of the Energy White Paper.

- 7.6 With regard to the specific issue of the Green Belt, paragraph 14 of MPS 1 notes the general presumption against inappropriate development, but also advises that mineral extraction need not be inappropriate development, nor conflict with the purposes of designating Green Belts, provided that high environmental standards are maintained during operation and that sites are well restored to after-uses consistent with Green Belt objectives. These standards, combined with high quality restoration proposals, are an intrinsic part of the proposed development.
- 7.7 In accordance with national policy outlined above, the proposal seeks to investigate the Holmwood Prospect, located within a proven hydrocarbon reserve (the Weald Basin). Accordingly, subject to an examination of environmental impacts, there is a proven national need for the development.
- 7.8 The Proposed Development, as seen from the content of Section 6 of this report and the results of the Environmental Impact Assessment as presented in the accompanying Environmental Statement, would not have an adverse impact on visual amenity or air quality nor will it affect any, known archaeology or floodplains, as the site is free from such constraints. It would not increase the potential for birdstrike.
- 7.9 The proposed development would not have a detrimental affect on: health and safety of the public; residential amenity; local highway capacity; the flow and quality of groundwater, surface water and land drainage; nature conservation; agriculture and forestry, including the proposed restoration or existing and potential recreation use.
- 7.10 The environmental impacts have been fully assessed and subject to implementation of suitable mitigation measures, no demonstrable impacts have been identified. Therefore the proposed development is in accordance with national and local planning policy.
- 7.11 In light if this assessment and the information presented in the ES, we request that the CPA grant planning permission for the proposed development.

