

Broadford Bridge Oil Exploration Site: Response to Common Queries

The County Council appreciates that proposals in West Sussex for onshore oil and gas raise concerns for local residents, especially about the potential impact of the development on people and the local environment. We would like to assure you that the County Council, as a mineral planning authority (MPA), takes its responsibilities very seriously and it works with the other regulatory bodies, such as the Environment Agency, to ensure that appropriate controls are put in place through the planning system and other regulatory regimes.

The following responds to some of the common queries that have been raised about the current oil/gas exploration operation taking place at Broadford Bridge.

Need for the Development

The Government has stated that a MPA should not consider the national demand for onshore hydrocarbon resources (or alternative energy supplies). It can only consider whether the use of land, and the impacts of the proposed development (including on health, the natural environment, and amenity), are acceptable or can be made acceptable (e.g. by attaching conditions to a permission to minimise or mitigate potential adverse impacts).

Planning Permission

The County Council granted planning permission in 2013 for *"The siting and development of a temporary borehole, well site compound and access road including all ancillary infrastructure and equipment, on land at Wood Barn Farm, Broadford Bridge, for the exploration, testing and evaluation of hydrocarbons"* (details [here](#)).

Having been implemented in September 2014, the planning permission allows these works to be undertaken on the site until 15 September 2017.

The County Council has not required or considered a new or revised application from the operator to vary the 2013 planning permission. This is because the developer is proposing to take the scheme forward in accordance with the planning permission and the conditions attached to it (that control the use and development of the application site).

Change of Operator

The licencing of sites to companies is undertaken by the Oil and Gas Authority which is part of the national government so they would have been advised of the change in operator. The planning permission is not 'personal' and runs with the site; therefore, the change in operator from Celtique to UKOG is not material to the planning process.

Ecology

The potential impact on ecology was considered in depth as part of the planning application process. The County Council's Ecologist is satisfied that the development can take place without harm to these features, subject to a

condition requiring that no vegetation is cleared during the bird nesting season (which it has not been). Furthermore, Natural England raised no concerns about the proposal.

Highways

The ability of the road network to manage the traffic associated with the works was considered as part of the planning application process, and no concerns were raised in relation to either highway capacity or road safety.

Fracking

The operator does not have planning permission to undertake fracking (hydraulic fracturing) at this site, nor have they expressed a desire to do so. **They can only undertake conventional exploration for oil/gas**, as set out in the planning permission relating to the site. Also, the operator does not have the necessary approvals from either the Oil and Gas Authority or the Environment Agency under other regulatory regimes to carry out fracking.

There are several existing oil sites in the County that have operated for decades with minimal impact on the environment and local communities and we have no reason to believe that the operation at Broadford Bridge is any different – and if anything, it is subject to far more stringent controls than was historically the case with such development.

Acidisation

Concern has been raised about the proposed use of 'acidisation'. The use of dilute acid is a very common industrial process used in creating and maintaining boreholes (whether for oil or water) to increase yield/performance or to rehabilitate a borehole (i.e. to remove blockages). The proposed use of dilute acid does not mean that KOGI are planning to develop and operate an 'unconventional well' at Broadford Bridge. The Environment Agency checks the type and amount of chemicals to be used to ensure that the environment is protected.

'Industrialisation' of the Countryside

The oil and gas industry is not self-regulating and if an operator wishes to drill at any other sites in the County, they will need to apply for a new planning permission to do so (and secure the necessary approvals under the other regulatory regimes).

Any new planning application will need to be treated on its merits taking account of adopted local plans and 'material considerations' including draft plans, Government guidance, and the views of consultees, landowners, and the public.

Environmental Permit

The County Council works closely with the Environment Agency and other regulators in ensuring the site operates in a way that protects people and the environment.

Concerns have been raised by the local community that the methodology approved under the Environmental Permit relating to the site is different to that approved under the planning permission. However, the County Council has reviewed the methodology submitted by KOGL/UKOG and has concluded that it would not represent a material change to either the principle or the operation of the development approved through the planning permission. Therefore, a revised planning application was not required.

The Environment Agency have advised the following with regards to their regulation of the site, that is, they have confirmed that the Environmental Permit is in place for drilling, but that the Permit for the next stage (well testing) is still under consideration:

"We are aware of the oil and gas operation at Broadford Bridge near Billingham. The site currently has a permit to drill a well under the Environmental Permitting Regulations 2016.

The operator has also applied to us to vary and extend their existing Environmental Permit, primarily to allow them to conduct a well test. They have also applied for a Standard Rules Permit to for the management of any crude oil encountered during the proposed well test. We are currently assessing these applications.

We will be conducting inspections at the site both pre- drilling and during drilling to ensure the conditions of the Environmental Permit are met.

Background info

Full details of the application to vary the existing permit and the new application for the storage of crude oil can be found at:

Variation of existing permit: <https://www.gov.uk/government/publications/rh14-9ed-kimmeridge-oil-gas-limited-environmental-permit-application-advertisement-eprab3806cgv003/rh14-9ed-kimmeridge-oil-gas-limited-environmental-permit-application-advertisement>

Permit to store crude oil: <https://www.gov.uk/government/publications/sr2015-no-2-storage-and-handling-of-crude-oil>"

Other Non-Planning Matters

There are a number of matters that lie outside the planning system and which are not the responsibility of the County Council, as the Minerals Planning Authority. These include the provision of seismic surveys, whether drilling would go through faults, the types of chemicals used, health and safety concerns (including the location of the nearest hospital), and the disposal of waste. For example, the Oil and Gas Authority considers the geology of the area, including faults, before confirming that drilling can take place.

Hopefully the above helps to clarify the situation. If you would like further information, this [link](#) takes you to the County Council's Oil & Gas Planning pages, where you can find further information regarding hydrocarbon extraction. There is also a FAQ section (available [here](#)) that sets out the roles and responsibilities of different regulatory authorities.

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