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Proposed Wellsite Restoration Plan – Ref Drg.No. 40134/PL/9/04/011, Rev 0, various
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Annexes

Annex 1 Planning & Regulatory Committee Report dated 18th April 2007

Annex 2 Environmental Appraisal, incorporating:

Chapter 1 – Introduction

Chapter 2 – Consideration of Alternatives

Chapter 3 – Noise and Vibration

Chapter 4 – Traffic and Transport

Chapter 5 – Tourism and Recreation

Chapter 6 – Air Quality

Chapter 7 – Landscape and Visual

Chapter 8 – Ecology and Nature Conservation

Chapter 9 – Environmental Risks

Chapter 10 – Health, Safety and Environmental Management

Chapter 11 – Summary and Conclusions

Appendices

A. Noise Supporting Document

B. Ecological Supporting Documents

C. Photographs of Existing Views

D. Traffic Data

Annex 3 Details of Restoration and Aftercare

EXECUTIVE SUMMARY

A repeat planning application of the same character and description has been prepared by Alliance Environment and Planning Ltd on behalf of Star Energy Weald Basin Ltd to drill and appraise the underlying geological strata at Albury Park, Surrey.

The proposed development can be described as the retention of an existing wellsite compound with associated surrounding bunds and associated access and roadway of some 1.51ha; the erection of new security fencing; the use of the appraisal site for the drilling of and flow testing for, hydrocarbons from up to two new appraisal boreholes; the retention of a transformer and switch-room and the retention of an existing appraisal well involving flow testing for hydrocarbons, the installation of appraisal facilities and provision of a container unit for use as offices and mess-room, all for a temporary period of up to 3 ½ years, with restoration to commercial forestry.

The existing compound at Albury Park is located in a designated Area of Outstanding Natural Beauty (AONB). This accompanying planning statement demonstrates that the proposed development would not harm the integrity of this nationally valuable landscape, or local amenities, and the environment.

This is the third application by the Applicant within the last two years seeking planning permission to appraise the underlying geological strata of the Albury Field for hydrocarbon potential in accordance with prevailing Government energy policy. The most recent planning application (reference GU06/02087) was recommended for refusal by Surrey County Council's Planning Officers only because the Applicant had failed to provide relevant noise data, although the Company had requested a deferral to allow time for the necessary measurement and modelling to be carried out. Following publication of the Officer's report (Annex 1) to the Planning and Regulatory Committee meeting on the 18th April 2007, the Applicant temporarily withdrew the planning application pending completion of the report on drilling noise. The assessment of noise has now been completed and consequently the application for appraisal drilling is now being re-submitted.

It is acknowledged that there has been public concern resulting from the previous applications relating to the Company's aspirations to utilise the underlying strata as a gas store for future natural gas storage. In particular, there has been anxiety regarding the potential industrial nature and scale of the surface level infrastructure, known as the '*Gas Processing Facility (GPF)*', that it was perceived would be required in this AONB location if the results of the appraisal of the underlying strata proved to be successful.

The Company has sought to allay fears about any future development by announcing that any decision to pursue the Albury 1 Gas Storage Project is independent of this application to further appraise the underlying strata. Also, if the gas storage project were to proceed then only minor adjustments would be required to the size of the existing site compound at Albury Park because an alternative site outside the AONB has been identified for the GPF within the Parish of Ripley some 8 km to the north.

Given that the compound is already in existence, the essential purpose of this planning application is to secure a temporary (scheduled for up to 18 weeks) drilling operation that is needed to obtain further geological information on the underlying gas bearing geological strata.

The focus of this application is on the outstanding issue of noise and any relevant changes to guidance or policy since the last submission in August 2006. It is also an opportunity to repackage the presentation of the proposals in a more concise format and to incorporate the results of more recent environmental appraisal work, for example that relating to the consideration of alternative drilling sites. Although additional environmental information is presented it is recognised that in the previous Planning Officer report noise was the only outstanding issue that would have otherwise led to a positive recommendation to the committee. Nonetheless, it is acknowledged that this is a new application.

There are a number of unequivocal statements in the Planning Officer report that are fundamental to the approach adopted in this repeat submission, namely:

1. *'The proposed temporary gas appraisal is not considered to require Environmental Assessment (EIA) development under the Environmental Impact Assessment Regulations 1999'*

Reference - 3rd Paragraph of the summary report (page 1)

2. *'Noise is the only issue where Officers consider that the proposal fails to meet policy requirements'*

Reference - 7th Paragraph of the summary report (page 2)

3. *'As the proposal is for a temporary period Officers consider it to represent the least damaging option to meet the proven need for energy resources, as the establishment of a new site and access would give rise to much greater impacts than utilising the existing site. Taking into account the advice from the DTI, the need to confirm the extent of the gas-field, and the considerations regarding the lack of alternative sites, Officers are satisfied that there is a need for the development and that there is no appropriate alternative site, and that the proven need can be met at the existing site'*

Reference – Paragraph 221 (page 51)

4. *‘Officers do not consider that either the rig or the development as a whole would have a significant adverse impact on the conservation of the natural beauty of the landscape or that the harm is so great as to justify refusing the proposal on the grounds of visual impact’*

Reference – Paragraph 222 (Page 52)

Since the publication of the Officer report in May 2007 the former Department of Trade and Industry¹ has published ‘Meeting the Energy Challenge A White Paper on Energy’. This sets out the Governments international and domestic energy strategy, and how it intends to implement the measures set out in the Energy Review Report 2006. In particular, it is relevant to this development proposal in that it emphasises the importance of the planning system in the delivery of necessary energy infrastructure designed to meet the national needs. Also, within the White Paper it categorises major gas infrastructure (including underground gas storage facilities) as being ‘Nationally Significant Energy Projects’.

¹ Now the Department for Business, Enterprise and Regulatory Reform.

Application Forms and Certificates

PLANNING STATEMENT

1.0 INTRODUCTION

- 1.1 The proposal involves development at the existing Albury gas field, situated south east of Guildford, Surrey and within DTI Licence DL004. Essentially, the development involves the drilling of up to 2 additional boreholes and the improvement of infrastructure and facilities on the existing site to enable further investigation of the underlying geological strata. The principle of gas related work has already been established by previous planning consents on the site.
- 1.2 This planning statement provides an explanation of the proposed development and its impact on the local environment and residential amenity and weighs up the merits of the application in the context of National Planning Policy and the Development Plan.
- 1.3 There is Government support for proposals of this nature which are regarded as being of significant national interest. This is the third application by the Applicant to temporarily appraise the underlying strata at Albury. The previous two applications received some public opposition. However, only one issue, that of noise, remained at the time the Company were compelled to withdraw the more recent application.

2.0 THE APPLICANT

- 2.1 Star Energy Weald Basin Ltd is an associated company of the Star Energy Group plc an integrated energy company that produces oil, gas and electricity from onshore sites in the United Kingdom. The Group's principle operations are focused on oil and gas fields in Hampshire, Surrey and Lincolnshire. The Group has developed and continues to operate a successful partially depleted hydrocarbon reservoir gas storage facility at Humbly Grove, in North Hampshire. In Surrey, its operations are principally associated around gas and oil fields in the east of the county, near Bletchingley and at Albury.
- 2.2 The Group was founded in 1999 and employs some 150 staff nationally and has a turnover of some £50 million. The Group owns and operates the 10 billion cubic feet gas storage facility at Humbly Grove in Hampshire and 26 oil and gas fields across the UK.
- 2.3 Not only is the Group currently in the process of appraising the potential to store gas at Albury, it is also seeking to do the same at Bletchingley, North Scampton (Lincolnshire) and Gainsborough (Lincolnshire). The Group is also evaluating potential offshore gas storage projects in the North Sea and other onshore storage projects in Europe.
- 2.4 Petronas International Corporation Limited is currently in the process of completing the acquisition of Star Energy Group plc, which will continue to trade as Star Energy, a wholly owned subsidiary of Petronas. Petronas is a leading multinational oil and gas company which encompasses: upstream oil and gas exploration and production (E&P); downstream oil refining; marketing and distribution of petroleum products; trading; gas processing and liquefaction; gas transmission pipeline network operations; marketing of liquefied natural gas (LNG); petrochemical manufacturing and marketing; shipping; and property investment. Star Energy remains committed to the development of gas storage facilities, including at Albury, which the UK will increasingly rely on in future years as imported gas becomes a dominant energy source in the UK.
- 2.4 Good public relations and safety are of paramount concern to the viability of Star Energy's business. In its business conduct and operational practices, the Company have demonstrated a positive attitude to the environment and to the local communities within which it operates. At Albury, a Liaison Committee that meets

regularly is already in existence and consists of parish council, district council and community representatives.

- 2.4 The Company is committed to continually improving health and safety and environmental (HSE) performance in all aspects of its activities. The Company has a Group Health and Safety Manager who reports directly to the Chief Executive. All operating activities are subject to risk assessment, with corrective training and procedural changes to minimise identified risk.
- 2.4 In March 2007, the Royal Society for the Prevention of Accidents (RoSPA) granted Star Energy the Gold Award for Occupational Safety for 2006.

3.0 LOCATION & SITE DESCRIPTION

- 3.1. The existing exploration and appraisal wellsite compound at Albury Park is located approximately 1km south-east of the village of Albury and approximately 7.5km to the south east of Guildford City centre. It is located within the Albury Park Site of Nature Conservation Importance (SNCI), the Metropolitan Green Belt, the Surrey Hills Area of Outstanding Natural Beauty (AONB), an Area of Great Landscape Value (AGLV), and an area of Historic Parkland. The surrounding countryside contains numerous small villages such as Shere, Blackheath, Gomshall, Burrows Cross and Farley Green.
- 3.2. The existing access to the compound is off New Road via a private tree lined track some 200 metres in length and 4 metres in width. At the junction of the track with New Road, to the west of the compound, there is a hard-surfaced bell-mouth entrance. There is sufficient width at the entrance to allow simultaneous movement of entering and egressing light vehicles, but not an HGV and a light vehicle.
- 3.3. New Road is a single carriageway road on a straight alignment, which connects to the wider road network via the A248 and the A25 Guildford Road. Thus, all movements can be achieved without the need to access Albury Village, which is designated as a Conservation Area. It is understood that no traffic accidents involving personal injury have occurred along New Road in the vicinity of the site access over the last five years.
- 3.4. The junction between New Road and the A248 is a ghost island T-junction. Where the A248 meets the A25 the latter splits into a dual carriageway in a north westerly direction.
- 3.5. The immediate vicinity of the compound consists of an undulating replanted ancient woodland area of land lying within the Albury Estate. Although the woodland consists of a more recent tree plantation there are examples of older specimens such as the native yew and oak, mixed with other species such as Wellingtonia and European oak. A public right of way is positioned some 200 metres to the east. This has some views towards the compound due to the lack of current under-storey in the woodland, however on the whole the site enjoys excellent screening on all sides because of the depth of the woodland.
- 3.6. The visitor facilities at Newlands Corner located approximately 4km to the north west of the compound enjoys panoramic views of the Surrey Hills to the south. Two mobile telephone masts, 30m and 35m in height, lie at the entrance to the existing

compound, although these are unconnected with the Star Energy operation. These masts are visible above the tree tops from Newlands Corner, although the existing compound is not visible.

- 3.7. The nearest residential dwelling to the centre of the compound is 'Keepers Cottage' located approximately 220 metres to the north-west on lower lying ground. A property known as 'The Bungalow' lies opposite the existing access to the compound approximately 270 metres from its centre.
- 3.8. The existing compound itself consists of an area of hardstanding with approximate dimensions of 50 metres by 75 metres that has been constructed over an impermeable membrane designed to make the site a contained unit for pollution prevention purposes. Surface water is directed into a perimeter PVC lined ditch. The compound and ditch is bounded by a 3m high landscaped soil bund. Just beyond the compound to the south west there is a fire water storage tank which is a standard piece of safety infrastructure at such sites.
- 3.9. The existing compound has a 2 metre high chain link fence within the hardstanding area marking an area of some 58 metres by 50 metres, with the ditch on the outside of the fence. Inside this fenced compound there is the following:
 1. An existing wellhead
 2. Two 1 megawatt (MW) gas engine generators
 3. Switchgear and Transformer
 4. A gas pressure reduction/metering package complete with filter/separator and gas heater
 5. An oil/condensate/water storage vessel
 6. Associated pipeline linkages
 7. Mobile office accommodation
 8. Emergency lighting
- 3.10 All of the infrastructure in the compound is at a low level below the surrounding tree line. The site is not permanently manned. The pressure flow of the gas is measured regularly once or twice a week as part of the inspection routine regime. Other than an annual enforcement inspection from the County Planning Authority there are no other regulators who regularly visit the site.

- 3.11 The current appraisal involves the extraction of gas through the single wellhead into the filter/separator unit to remove any oil/water. It is then supplied to the two generators where electricity is produced and supplied to the National Grid.
- 3.12 The Albury field is situated on the northern side of the Weald Basin on the downthrown side of the major East West 'Hog's Back Fault'. It produces gas in the Albury-1 well from a thin, high permeability sandstone within the Purbeck sequence. Based on analysis of geological, production and pressure data it has been concluded that this reservoir has the required characteristics for safe and effective gas storage. This gas storage project is known as the Albury 1 Gas Storage Project and is **not** the subject of the current application.
- 3.13 Further prospectively has been recognised deeper in the Portland and Corallian Sandstones which form the primary objectives of a planned appraisal wells. If successful, these reservoirs could form the basis of an Albury 2 Gas Storage Project.
- 3.14 An evaluation of the Albury field was carried out in early 2004 by Star Energy. The need for a 3-D seismic survey to facilitate accurate description of the field structure was identified. A £1 million 3-D seismic survey was acquired by IMC Geophysics on behalf of Star Energy in February 2005. Following interpretation and integration of the geological and engineering data it was concluded an appraisal well was required to help inform any evaluation.
- 3.15 Prospectivity in the deeper Portland and Corallian Sandstones has been identified on the basis of the following:
- hydrocarbon shows observed from cores and cuttings in the adjacent Bramley-1z well;
 - clear structural definition interpreted from seismic survey; and
 - analogies with other fields within the Weald Basin including oil production from the Corallian Sandstone at Palmers Wood and gas production in the Portland Sandstone at Godley Bridge.
- 3.16 The Portland and Corallian structural interpretations can be confidently tied to the seismic using the Bramley-1z well and show structures capable of storing economically viable volumes of gas. The top of the Portland Sandstone sequence is marked by the Purbeck Anhydrite, which provides an effective seal to hydrocarbons. The Corallian Sandstone is overlain by a thick sequence of Kimmeridge Clay which

can be confidently identified on seismic survey. This formation provides the cap rock for a significant portion of the producing oil and gas fields in northern Europe.

- 3.17 The current application is to undertake further appraisal drilling in order to determine the viability of deeper strata, below the Purbeck Sandstone, which may also be suitable for gas storage. The technical and commercial viability of this “Albury 2 Gas Storage Project” has yet to be proven and it is therefore, at present, uncertain whether this second project would proceed. Both the Albury 1 Gas Storage and Albury 2 Gas Storage projects have been identified as potential gas storage projects by the Government’s Joint Energy Security of Supply Working Group (JESS)². The two projects are however independent and development of Albury 1 does not dictate that Albury 2 would also go ahead. Equally, Albury 1, is commercial in its own right and can proceed without Albury 2.

² JESS Long-Term Security of Energy Supply, December 2006 Report.

4.0. BACKGROUND AND PLANNING HISTORY

- 4.1. Seismic surveys were carried out in the late 1970's and early 1980's that indicated that the underlying strata in the vicinity of Albury may potentially contain a hydrocarbon reserve.
- 4.2. Planning permission (reference GU87/422) for the construction of a drill site at Albury Park, drilling of an exploratory borehole and subsequent testing in the event of hydrocarbons being present was granted in 1987 for a temporary period of five years. The permission was conditioned so that following reinstatement of the site it would be returned to forestry. Subsequent drilling operations identified gas bearing Purbeck Sandstone at a depth of approximately 2,300 feet (701 metres).
- 4.3. A number of applications for planning permission to extend the life of the compound and allow further testing to take place were approved, references GU88/405, GU91/1408, GU93/0503 and GU98/1082.
- 4.4. A planning permission (reference GU05/0637) to retain the exploratory well site for a temporary period of 5 years was permitted in August 2005 to allow continued appraisal of the chemical composition and pressure flow of the gas within the Purbeck Sandstone, until 2010. The hours of operation permitted by the planning permission limit working hours to:

0800 – 1900 Monday to Friday

0800 – 1300 Saturdays
- 4.5. Other than the available seismic information there is considerable uncertainty concerning the presence of gas bearing strata below the Purbeck Sandstone. There are no other existing wells which could be used to measure, predict and model the quality and behaviour of these strata. Interpretation of 3D seismic study data carried out during 2005 established the need for further appraisal of the underlying strata. This can only be achieved by drilling of up to two further boreholes and then testing for a temporary period the flow and composition of the gas.
- 4.6. A subsequent planning application (reference GU05/02357), accompanied by an Environmental Assessment, to drill two boreholes into the underlying geological structure from Blackheath Common was submitted to Surrey County Council (the relevant Mineral Planning Authority) in November 2005. The site and access route were located in the Surrey Hills Area of Outstanding Natural Beauty (AONB) and the access route also crossed two Sites of Nature Conservation Importance. In addition,

the proposed development was in close proximity to the Blackheath Site of Special Scientific Interest (SSSI).

- 4.7. The application was withdrawn in August 2006 following community concerns about the proposals, particularly the site construction traffic associated with the importation of materials to create a new drilling site passing through the village of Blackheath. It also allowed more time for the company to consider alternative less sensitive options.
- 4.8. It was then decided to pursue the further testing of the geological structure via the existing wellsite at Albury Park using new drilling equipment that had to be brought into the country from Europe. Although this alternative option was also in an environmentally sensitive location it was recognised that the site was already in existence, it was visually very well screened and the existing appraisal activities had taken place there without any disturbance for many years.
- 4.9. An alternative proposal to directionally drill from the existing wellsite at Albury Park was submitted to the County Council in August 2006 (reference GU06/02087). It was considered that utilisation of an existing compound offered a more sustainable and practical proposition whilst minimising local disturbance because it negated the need to construct a new wellsite and access with the associated construction activity.
- 4.10. The second application to appraise the underlying strata resulted in a large number of objections. Officers requested further information and clarification concerning a number of matters. However, eventually by the end of March 2007 only the issue of noise remained. In order to conduct the appraisal with the greatest efficiency and sensitivity the Company had invested in a new rig that had to be imported into the UK. Unfortunately, the importation process and subsequent testing of the constituent parts took longer than expected.
- 4.11. A written request was made by the Chief Executive of the Company to Surrey County Council on the 28th March 2007 seeking a deferral of any consideration of the application to allow time for the completion of the assembly and testing of the new rig. This was rejected by Officers who indicated that they would report the application to the nearest committee meeting on 18th April 2007 with a recommendation to refuse. A subsequent officer report was prepared and published. The Company withdrew the application on 16th April 2007.

5.0 PRE APPLICATION CONSULTATIONS

5.1 Consultation with statutory bodies and other interested parties is an important part of assessing the environmental impacts of a proposed development. The aim of consultation is to ensure that the views of stakeholders are identified early on in the project, taken into account in the Environmental Appraisal and reflected in the design of the scheme itself.

5.2 Star Energy has been consulting on the Albury Appraisal Well project prior to the current planning application being made as follows:

- local communities, represented by the Borough Council, Parish Councils and residents associations, have been consulted on the proposals through the *Star Energy Liaison Group* which has met seven times during 2006 and 2007;
- engaging with Surrey County Council, as the relevant planning and highways authority, on the proposals from an early stage in the project development process; and
- consulting other statutory authorities and non-governmental organisations.

5.3 Consultation responses on the previous planning application for the Appraisal Well, made in August 2006, identified the key concerns regarding the proposed development. The following issues raised during that previous consultation have been addressed in the current application:

-
- Site Selection
 - Traffic and Site Access
 - Landscape and Visual
 - Community Safety
 - Noise and Air Quality
 - Ecology
 - Need for the Development
 - Impact to Local Recreation
 - Need for an EIA
 - Lighting
 - Planning Policies
-

- Removal of existing testing and generator equipment and facilities, except existing transformer and high voltage (HV) switchroom.
- Provision of wire mesh security fencing and new entrance gate to allow for all of the compound hard-standing to be utilised compared to the smaller area that is currently fenced.
- The delivery of a 360 degree excavator to the site to enable the excavation of a well cellar to accommodate the two new wells with overall approximate dimensions of 12 metres x 3.2 metres and a depth of 4 metres. Excavation of the new well cellar will be as follows:
 - The site is presently covered with a combination of concrete hardstanding and gravel underlain by an impermeable membrane. The stone in the area of the proposed new well cellar will be carefully removed to expose the underlying impermeable membrane. The existing stone is circa 300 mm thick and is designed to accommodate the loadings associated with a drilling rig (the original permission) and will be suitable for the proposed drilling rig and associated plant and equipment. The initial top layer of stone will be removed by machine; the lower level closest to the membrane will be removed by hand.
 - The impermeable membrane will be carefully cut back to allow surplus material to be retained to dress into the new concrete at the top of the cellar walls. The area of the well cellar will be excavated to a depth of approximately 4 m. The excavated material (consisting of approximately 185 cubic metres) will be placed in a skip and removed off site by a licensed contractor. Temporary shoring will be provided as required. The concrete base will be cast with openings left for the conductor tubes. The cellar walls will be cast. The impermeable membrane will be trimmed to, and inserted into, the top section of the concrete wall in order to create an impervious seal around the well cellar complete. The conductor tubes will be installed through the hole left in the cellar floor and will then be sealed with concrete to form an impermeable structure and to maintain the integrity of the sealed site and the well cellar.
 - Concern has been raised previously that as a result of military activity in the area during the Second World War there may be unexploded

ordinance in the area. The Albury Estate has confirmed that there is no record of buried munitions within the compound area. Indeed, it is considered likely that if there were any there they would have been uncovered when the exploration compound was first constructed. There is therefore minimal risk associated with this part of the operations.

- Retention of the existing wellhead and concrete lined well cellar.
- Provision of concrete pads to provide structural support and a level foundation for the drilling rig and the silos.
- Siting of temporary mess room and office facilities.

Phase 2 – A one week Site Mobilisation period by up to twenty employees directed by a ‘Rig-master’ involving the following:

- Mobilisation of a white coloured trailer mounted hydraulic Drilling Rig as shown below in the attached photograph No 1. When fully extended the drill mast will have a height of 30 metres. The mast will only be extended when the rig is actually drilling.



Photograph No 1 – Drilling Rig on site at Cold Hanworth, Lincolnshire

- Siting of the drill pipe storage area, pipe carousel and, pipe handling unit for handling and storage of the drill pipe.
- Siting of 3 packaged generators, a power control room, an acoustically clad hydraulic power unit and, a back-up generator.
- Siting of a diesel tank for fuel storage.
- Siting of a water tank (for drilling activities) supplied locally by a tanker.
- Siting of 2 mud tanks, 2 cuttings skips, 2 mud pumps acoustically clad, 1 mud pump store, 4 mud silos and, 2 fluids silos to accommodate water based muds and general amenity water.
- Siting of the choke manifold, well control equipment, de-gasser and centrifuge all associated with operation of the drilling rig and located in the vicinity of the rig trailer.
- Siting of a 4.5 metre high acoustic fence on the south east boundary of the compound of the type shown below on the attached photograph No 2 on site at Humbly Grove Wellsite 'A', Hampshire.



Photograph No 2 – Acoustic Fence on site at Humbly Grove Wellsite 'A', Hampshire.

- Siting of various container units as follows:

- six 12 metre long container units, stacked double height, for on-site 24-hour accommodation for the drilling rig crew, including temporary toilet facilities which will be regularly emptied by a tanker
- two 12 metre and two 6 metre long container units, stacked double height, to provide office accommodation and welfare facilities
- three 12 metre long container units for the driller's store, the driller's workshop and, the mud laboratory office/24-hour accommodation
- one 6 metre long container unit for the mud logging unit
- one 12 metre long trailer for drilling chemicals
- one 6 metre long tank for cement blending
- one three metre long security cabin
- Erection of directional lighting (see lighting schedule attached to Drg 40134/PL/9/04/010 Rev 4)

Phase 3 – Drilling to a depth of some 1,300 metres true vertical depth subsea, or some 1,400 true vertical depth from the actual surface of the wellsite (although, because the proposal involves a directional drill the actual measured length of the well will be approximately 5,000 metres). Drilling will be carried out by a normal drilling crew complement of ten employees in any one shift involving the drilling of up to two new boreholes over a maximum 18 week period. Additional personnel will be on site on an adhoc basis to provide third party drilling services as required. Allowance has been made within the application for 2 wells, however a second well would only be required if the first did not reach the desired geological target.

This is the most intense and costly part of the process. It is therefore essential that the drilling is completed as quickly as possible. In this instance a maximum 18 week period has been allocated although every attempt will be made to minimise this. During drilling, drilling fluids are circulated through the drill string, bit and casing for lubrication, cooling and the removal of cuttings. As each borehole section is drilled lengths of steel piping are fed into the hole to case it. Mud, shale and rock cuttings that are removed are contained in holding tanks and then removed off-site to an appropriately licensed waste management facility. It is estimated that approximately 400 cubic metres of cuttings will be removed.

The well will be drilled from the surface location cellar, which will be both reinforced and sealed. The well will initially be drilled vertically and as the well path deepens it will be directed toward the Portland and Corallian Sandstones as a directional well. It is anticipated that the final path of the well will be generally horizontal as it reaches the required target areas.

The well will be drilled in different hole sizes, becoming smaller the deeper the well is drilled. Each hole section will be cased off using steel casing to isolate the various formations that are penetrated. Clays, shales, and rock cuttings removed from the geological strata of the well as it is drilled will be stored in mud tanks on site and removed by truck to appropriately licensed waste management facilities.

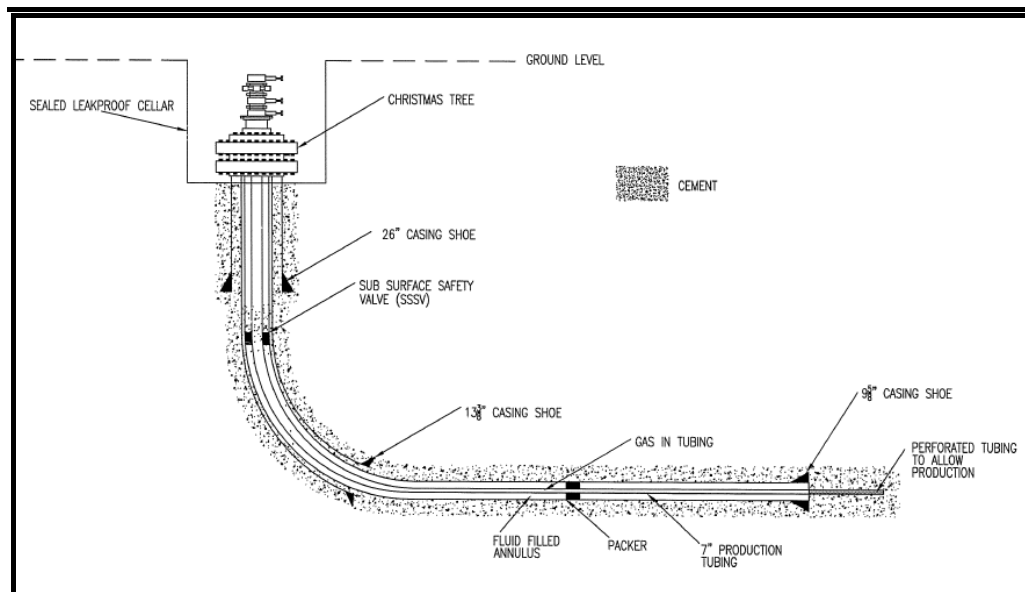
During the drilling process, drilling fluids (muds) will be pumped down the well to circulate through the drill bit and casing, for cooling, and for removing the cuttings to surface as the well is being drilled. The drilling fluids will also control the well bore pressures. Water based muds will be utilised to a depth of some 450 m. For depths beyond this low toxicity oil based muds will be used.

Water based muds will be mixed on site utilising water provided locally by tanker and chemicals will be added as required. Oil based muds will be rented from a certified contractor. Cement will be mixed on site and used to set the casings in place. Water to be used during the drilling process will be tankered to site.

All drilling operations will be operated and maintained in accordance with the Borehole Sites and Operations Regulations 1995 and the Offshore Installations and Wells (Design and Construction, etc.) Regulations 1996. The equipment used to maintain well control during well testing is also governed by the same regulations.

Upon completion, the well will be secured with surface and subsurface valves. As part of the completion activities, a Sub Surface Safety Valve (SSSV) will be installed below ground level. The SSSV will close automatically in the event the integrity of the well is compromised. A typical well construction schematic is provided in *Figure 2* below.

Figure 2 Schematic of a Typical Well Construction (Source: Star Energy)



Phase 4 – A one week Drilling Rig Demobilisation period by up to twenty employees involving the following:

- Demounting of the trailer rig and its constituent parts to enable its removal from the site.

This stage of the operations will involve the same number of vehicular movements as the mobilisation phase.

Phase 5 – Initial Testing and Appraisal by up to ten employees.

Once the wells have been completed, and after the removal of the rig, a period of some six weeks will follow to test and appraise the well using a well test and appraisal package.

The well test and appraisal package will incorporate a gas/fluid separator, gauge tanks, choke manifold to control flow rates and pressures and a line to the 'clean enclosed burner' where produced gas is to be combusted. Nitrogen will be used to purge the package of produced gas once the test and appraisal activities are complete.

Testing and appraisal of the wells will involve removing the drilling fluids from each well and subsequently burning gas from the reservoir. This process will essentially involve:

- siting and set up of the well test and appraisal package;

- erection in the north east corner of the compound of a state of the art 6.2 metre high enclosed burner otherwise known as a '*clean enclosed burner*'. This will produce an extremely clean, lightweight and highly aerated gas that as a result rises vertically and invisibly out of the stack. A photograph of a '*clean enclosed burner*' similar to that intended for this project is provided below;



Photograph 3 – Clean Enclosed Burner

- lifting and unloading the well of fluids and obtaining gas to surface;
- via the '*clean enclosed burner*' flowing and combustion of the gas for up to approximately 26 days although it is hoped that this could be reduced to 14 days or less based upon 24 hour operation without breaching Surrey night-time noise limits,
- shutting in the well using the surface and subsurface valves leaving the well safely isolated; and
- retention of the well test and appraisal package and removal of the '*clean enclosed burner*'.

Phase 6 – Ongoing Appraisal by up to two employees

Subsequent to the Initial Testing and Appraisal during Phase 5, the ongoing appraisal will involve the regular measuring of the reservoir pressure for the

remainder of the Application duration. This will be done using pressure gauges mounted on the wellhead.

Phase 7 – Restoration and Aftercare by an average of eight employees at any one time.

If the appraisal of the underlying geological strata is unpromising, the boreholes will be plugged and made safe in accordance with standard abandonment regulations. Restoration of the Wellsite to commercial forestry would then proceed in accordance with the application drawing “Proposed Wellsite Restoration Plan – Ref Drg.No. 40134/PL/9/04011, Rev 0, various scales” which is a replica of the restoration plan (Reference Drawing No. ENF 01101 dated November 2004) approved by Surrey County Council with respect to Planning Permission reference GU05/0637. The conditions attached to this extant consent specify that restoration should be carried out:

‘within a period of 5 years from the date of this permission or within 6 months of the completion of flow testing, whichever is the earlier, all buildings, plant, machinery (both fixed and otherwise) and any engineering works connected therewith, on or related to the application site (including any hard surface constructed for any purpose), shall be removed and the site be fully restored to a condition suitable for forestry.’

Condition 8 of GU05/0637 states that:

‘all tree shrub planting and other landscape works implemented pursuant to this permission shall be maintained in good healthy condition and be protected from damage for the duration of the restoration works and for five years from the completion of restoration in any part of the site. During that period any trees or shrubs that die, or are severely damaged or diseased shall be replaced in the next available planting season with others of a similar size and species.’

Condition 6 of GU05/0637 requires that:

‘soils shall be spread over the site at an even depth and shall not exceed the levels shown on Drawing No. ENF 01101 dated November 2004.’

The details of the approved restoration and aftercare proposals from the extant planning permission are reproduced in Annex 3.

Surface Water Management

6.3 The existing site is self contained with respect to surface water drainage. The existing impermeable membrane will continue to ensure that water cannot escape from the site. Surface water drainage will be collected in the existing PVC lined ditch around the perimeter of the site, for subsequent collection by tanker and removal off-site for disposal/treatment at an appropriate licensed facility as required.

Hours of Operation

6.4 The proposed hours of operation for all the phases, except Phase 3 and part of Phase 5 , will be consistent with the terms of Condition 3 of the existing planning permission on the land (reference GU05/0637) which specifically sought to restrict the operations on the site to between 0800- 1900 Monday to Friday and 0800 to 1300 on Saturdays only. During Phase 3 working will be for 24 hours seven days per week throughout the scheduled 18 week drilling period.

6.5 During the six week Phase 5, flowing and combusting the gas via the ‘*clean enclosed burner*’ will occur either for 24 hours seven days per week for up to 14 days or, for approximately 26 days during day-time only.

Traffic Details

6.6 The Traffic and Transport chapter of the accompanying Environmental Appraisal sets out the potential impacts of the appraisal wellsite proposal upon traffic and transport within the local area.

6.7 Movements associated with the proposed development will be significantly reduced by the benefit of not having to construct a new compound. All HGV movements to and from the site will be via the A248 and the A25. The existing access track from New Road will be utilised.

6.7 The vehicles and plant anticipated to be required for this Application are as follows:

Vehicle /Plant	Type	Phase	Use
Wheeled Excavator (JCB Type)	HGV	Site Preparation	Excavations during site preparation

Vehicle /Plant	Type	Phase	Use
4-axle rigid HGV Tipper Truck (carrying capacity of 10m ³)	HGV	Site Preparation	To remove excavated spoil during civil works.
Lorries carrying Ready Mixed Concrete	HGV	Site Preparation	To construct the well cellars during site preparation
Standard size lorries and flat- bed trucks	HGV	Site Preparation	Delivery of general construction materials during site preparation.
Articulated Lorry (15.5 m long)	HGV	Mobilisation / Demobilisation	Delivery and removal of the main part of the drilling rig
Standard size lorries and flat- bed trucks	HGV	Mobilisation / Demobilisation	Delivery and removal of testing equipment and, drilling rig ancillary equipment and machinery
Standard size lorries and flat- bed trucks	HGV	Drilling	Delivery and removal of steel drilling pipe
Skip Disposal Trucks	HGV	Drilling	Disposal of inert waste
Tankers	HGV	Drilling	Delivery of drilling fluid (mud) Delivery of water for drilling fluid Delivery of fuel for the rig generators
Truck silo / cement truck	HGV	Drilling	Delivery of cement for well bore casing

Vehicle /Plant	Type	Phase	Use
Cars/Vans	LGV	General	Personnel daily transport to/from site
Compressor Cutter	Plant	General	General use, as and when required
Welding Equipment	Plant	General	General use, as and when required

- 6.8 A Traffic Management Plan will be prepared and implemented by the drilling contractor to help maximise the safety of the workforce and other highway users during the course of the works and to help ensure that traffic is kept flowing as freely as possible on the public highways in the vicinity of the operations. In particular because of the single lane width access track the Traffic Management Plan will incorporate measures to manage HGV movements to avoid queuing on New Road and potential conflict on the access track. The good accident record of New Road supports the adequacy of the access for a temporary use.
- 6.9 When exiting the access track onto New Road, visibility zones from 2 metres back from the edge of carriageway of New Road are adequate in the trailing traffic direction at this location. To provide adequate visibility in the leading traffic direction for HGV's it will be necessary to trim the vegetation hanging over the fence line in order to allow clear visibility to the brow of the hill. Discussions are ongoing with the landowner to seek agreement to trim this vegetation.
- 6.10 During Phase 1 site preparation the movements associated with the operations will be as follows:
- A maximum of 10 car or light van movements per day involved in the transportation of personnel to and from the site.
 - An average of 4 HGV movements per hour (44 movements per day) spread over two weeks involving ready mixed concrete and construction material deliveries, and the removal of spoil and existing plant from the site. A maximum of 14 HGV movements per hour (154 movements per day) may occur on isolated occasions.

6.11 During Phase 2 mobilisation and Phase 4 demobilisation of the drilling rig the movements associated with the operations will be as follows:

- A maximum of 10 car or light van movements per day involved in the transportation of personnel to and from the site.
- An average of 12 HGV movements per day, up to a maximum of 16 movements per day, associated with the erection of the trailer mounted rig only. In order to minimise any local disturbance not all of the loads will arrive at the same time.

6.12 During Phase 3 drilling the movements associated with the operations will be as follows:

- A maximum of 40 car and van movements per day involved in the transportation of personnel to and from the site.
- An average of 12 HGV movements per day, up to a maximum of 14 movements per day, essentially involving the delivery of steel piping and water for drilling fluids, and skip vehicle movements associated with the removal of the drilling cuttings.

The vehicular movements associated with Phase 5 initial testing and appraisal will be as follows:

- A maximum of 10 car or light van movements per day involved in the transportation of personnel to and from the site.
- A maximum of 2 HGV movements per day.

6.13 The vehicular movements associated with Phase 6 ongoing appraisal will be minimal, being very similar to the existing situation. There may be a requirement very infrequently, and no more than twice a year, for more intensive maintenance to take place but this is not expected to generate more than an additional 6 movements per day.

6.14 Subject to a detailed restoration scheme to be agreed with the Mineral Planning Authority restoration of the compound in the event of a decision to plug the boreholes will likely involve a significant number of HGV movements associated with the removal of the hardcore base. This may possibly amount to over 1000 movements with further movements required in the actual relaying of the soils and restocking of the site with native woodland tree species. Although plans have not yet been drawn up for this eventuality it is envisaged that movements would be staggered over

several weeks to restrict any potential highway impact, or disturbance to the local community.

6.15 Overall it is considered that the movements associated with this temporary development will be minimal in the context of the total number of vehicle movements recorded in the traffic surveys.

6.16 From the edge of carriageway of New Road adequate visibility is available in the trailing traffic direction at this location. To provide adequate visibility in leading traffic direction for HGV's it will be necessary to trim the vegetation hanging over the fence line in order to allow clear visibility to the brow of the hill. The good accident record of New Road supports the adequacy of the access for a temporary use. The access to the site is wider at this point allowing simultaneous entry and exit.

6.17 Materials and Storage Information

6.18 The anticipated raw material requirements per well during the works are summarised below:

- 500 m³ of raw water
- 170 m³ of potable water
- 300 m³ of diesel
- 200 m³ of concrete/Cement
- 10 m³ of nitrogen (supplied as liquid)
- 10 m³ of timber (formwork)

6.19 Mud chemicals will be stored in covered trailers. Casing will be stored on the pipe racks as part of the rig equipment. A small area on site will be allocated for any small welding jobs that need to be done; any large items will be fabricated off site and then delivered to site.

Waste Management

- 6.20 A Site Waste Management Plan (SWMP) will be developed and implemented by Star Energy in accordance with new statutory requirements which are to be introduced in April 2008. During the drilling process, all waste materials will be handled by a licensed waste contractor and will be disposed of at registered landfill sites as required.

7.0 ENVIRONMENTAL ASSESSMENT

- 7.1 A previous formal Environmental Impact Assessment (EIA) Screening Opinion from the County Council confirmed that the proposal to drill two boreholes from the existing Wellsite at Albury Park was not EIA development. Accordingly the submission did not contain an EIA. Given that this is a repeat planning application it has been considered unnecessary to request another screening opinion.
- 7.2 Although the proposal is not EIA development the present application is accompanied by an *Environmental Appraisal* (Annex 2) in accordance with normal planning procedures. This Environmental Appraisal has considered all of the issues that would be expected to be covered in an EIA.

8.0 NEED FOR THE DEVELOPMENT

- 8.1 Applicants do not normally have to demonstrate the need for their proposed development, or discuss the merits of alternative schemes. However, in this case because of the location of the application site in an Area of Outstanding Natural Beauty, there is a need to consider the need for the development. This section sets out the strategic need for gas supply infrastructure as endorsed at a national level. Chapter 2 of Annex 2, the Environmental Appraisal considers the alternative sites that have been assessed for this temporary development.
- 8.2 Gas reservoirs can occur naturally in the environment within sedimentary rocks layered by non-porous rocks situated many thousands of feet below the surface of the Earth. Over two thirds of the UK's heat comes from these sources predominantly located off-shore in the North Sea. However, production in the sea has now peaked and is now declining meaning that the UK will become increasingly dependent on imports from countries in less stable regions with increasingly longer supply chains. Indeed, since 2005 the UK has become a net importer of gas.
- 8.3 Despite the ongoing decline in domestic gas production, the demand for gas in the UK is forecast to continue to grow. The Department for Business, Enterprise and Regulatory Reform (BERR) estimates that by 2010 gas imports could make up a third or more of the UK's total annual gas demand, potentially rising to around 80% by 2020 on the basis of existing policies.
- 8.4 'Meeting the Energy Challenge A White Paper on Energy' published by the former Department of Trade and Industry (now BERR) in May 2007 states that the UK faces two main security of supply challenges:
- our increasing reliance of oil and gas in a world where energy demand is rising and energy is becoming more politicised ; and
 - our requirement for substantial, and timely, private sector investment over the next two decades in gas infrastructure, power stations, and electricity networks.
- 8.5 As a consequence the Government has set out the national need to ensure secure future energy supplies. Its four long term goals for energy policy are:
- to put the UK on the path to reducing carbon dioxide emissions by 60% by 2050;
 - to maintain reliable energy supplies;
 - to promote competitive markets in the UK and beyond; and

- to ensure that every home is adequately and affordably heated.
- 8.6 Because gas supply is essential to the economy the Government and Industry are working together to encourage investment that could slow the rate of decline in gas production and provide confidence over the reliability of gas supplies. Not only is there a need to ensure sufficiency in supply but there is a need to ensure that network capacity is available.
- 8.7 The amount of gas fed into the National Gas Transmission system is led by consumer demand. This is characterised by high variability as prevailing weather conditions mean that gas use varies considerably throughout the day and from season to season.
- 8.8 In the summer demand for gas is between 200 to 250 million cubic metres per day (mcm/d) while on an average winter day this can rise to 350 mcm/d. On a very cold winter day, demand could climb to 400- 450 mcm/d.
- 8.9 The National Gas Transmission system is required to have sufficient gas transport capacity to meet peak winter gas demand (defined as 1 in 20 winter day). The ability to meet the demand for sustained cold spells though will become increasingly in doubt until new gas import projects become operational. Addressing the risk of under supply in the network is of national significance.
- 8.10 Because of the high variability in demand a buffer spare capacity on the system is required for gas supplies to be secure. In paragraph 1.3 of the DTI Gas Security of Supply – An Energy Review Consultation dated October 2006 it states that spare capacity can take a number of different forms:
- Oversized import structure;
 - Storage capacity; and
 - Demand size flexibility.
- 8.11 A potential gas store at Albury with a capacity of 715mcm is listed in Chart 1: Current and Planned Gas Supply Infrastructure in the DTI Gas Security of Supply – An Energy Review Consultation, dated October 2006. This included both the Albury 1 and Albury 2 projects. This envisages that the store will be available in the 2007/08 period.
- 8.12 In the Government Energy Review published in July 2006 it states in paragraph 7.4 that the timely delivery of energy infrastructure plays an important role in maintaining

the reliability of our energy supplies. Securing the necessary consents can be a major cause of delays for all types of energy projects.

8.13 In Paragraph 7.42 of the Review it states that:

'Government has already stressed the importance of additional gas supply infrastructure, and announced a programme of work to reduce planning barriers for developers of gas supply infrastructure projects. A key element of this work is to aid local authorities and those involved in making planning and consent decisions at a local level by clarifying the Government policy context and indeed the overriding national need for new gas supply infrastructure projects. This will help all parties to play a more effective role in the existing planning system. As part of this work, Government published a clear Parliamentary Statement of Need for additional gas supply infrastructure on 16 May 2006, to be held as a material consideration in all planning decisions.'

8.14 In the recent Energy White Paper the need for the proposed development is unequivocal. In paragraph 8.3 it states that :

'In gas, as our reliance on imports increases, we need more import and storage infrastructure if we are to maintain reliable and affordable supplies of energy. If developers cannot secure planning permission for electricity generation projects and gas supply infrastructure projects in sufficient numbers in a timely fashion, the UK could be exposed to rising security of supply risks, with the potential for upward pressure for energy prices,'

8.15 On the 16th May 2006, Alistair Darling, the Secretary of State for the DTI published a written statement entitled 'Energy Statement of Need for Additional Gas Supply Infrastructure'. The statement unequivocally sets out the national strategic importance of gas storage. On announcing the statement he stated:

'Most of all it should be seen by local authority planners, in particular in the limited number of areas suitable for gas storage, as a material consideration of considerable weight, leaving them in no doubt that the decisions they make are critical to our national energy security'

In the statement it states:

'New energy infrastructure projects may not always appear to convey any particular local benefit, but they provide crucial national benefits, which all localities share. In particular, projects add to the reliability of national energy supply, from which every user of the system benefits.'

- 8.16 Above all this is a clear steer from the Government that the wider public benefits associated with gas recovery and gas storage should be given significant weight when considered the local concerns over the impact of development.

9.0 NATIONAL PLANNING POLICY

Planning Policy Statement (PPS)1 : Delivering Sustainable Development (2005)

9.1 PPS1 sets out the overarching planning principles on the delivery of sustainable development through the planning system. It sets out the Government's key aims for sustainable development, which are:

- social progress which recognises the needs of everyone;
- the effective protection of the environment;
- the prudent use of natural resources; and
- the maintenance of high and stable levels of economic growth and employment.

It then states in paragraph 5 that planning should facilitate and promote sustainable inclusive patterns of urban and rural development by:

- making suitable land available for development in line with economic, social and environmental objectives to improve people's quality of life;
- contributing to sustainable economic development;
- protecting and enhancing the natural and historic environment, the quality and character of the countryside, and existing communities;
- ensuring high quality development through good and inclusive design, and the efficient use of resources; and
- ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community.

9.2 Sustainable development requires planning authorities and decision makers to make suitable land available for development to achieve economic and social objectives. This includes making land available that contributes to sustainable economic development. As previously stated, permitting the appraisal well at Albury Park will enable the Applicant to assess whether there are viable reserves of gas that can be recovered and whether it would be possible to develop a gas store in the ground below at Albury. This future development, if suitable, is intended to contribute to sustaining the economy of the UK by ensuring a steady supply of energy.

9.3 The economic and social objectives of sustainability also need to be balanced in planning against the need to protect and enhance the environment. In paragraph 17 of PPS1 it states that:

'Planning policies should seek to protect and enhance the quality, character and amenity value of the countryside and urban areas as a whole. A high level of protection should be given to most valued townscapes and landscapes, wildlife habitats and natural resources. Those with national and international designations should receive the highest level of protection.'

- 9.4 The location of the existing appraisal well and associated infrastructure is in the Green Belt, in the Surrey Hills Area of Outstanding Natural Beauty (AONB) and the Surrey Area of Great Landscape Value (AGLV) and in a Registered Listed Historic Garden. Any adverse impacts arising from the development on these national and local designations will need to be balanced against the national need for future gas storage facilities and the availability of alternative locations outside of such designations in the context that the site is already in existence and the development would only be temporary.
- 9.5 The accompanying assessments submitted with this application illustrate that the development can be conducted without any adverse harm on the landscape. The existing site is totally screened from view. Only the top of rig mast will be visible from long distances over the short duration of the drilling operations. The mast will be shorter than the higher of the two adjoining telephone masts that are permanently sited next to the compound.
- 9.6 Prior to the submission of the previous planning application an appraisal of alternative sites some of which were located outside the AONB was carried out. However, taking into account designations, proximity to residential properties, access, traffic generation and ownership it was concluded that the utilisation of the existing drilling site was clearly justified on the grounds of sustainability and land use criteria. It was fairly and reasonably considered that the construction of an alternative compound with the resultant heavy goods vehicle movements, estimated to be c.1000, would result in a much greater disturbance to the environment than the use of an existing facility.
- 9.7 In weighing up the economic, social and environmental impacts of a proposal and its contribution to sustainable development paragraph 23 of PPS1 states that planning authorities should:

'Recognise the wider sub-regional, regional or national benefits of economic development and consider these alongside any adverse local impacts...'

The importance of the gas recovery and storage potential associated with the proposed development to the UK economy to contribute to national supply needs has been set out in the need chapter above.

Planning Policy Guidance (PPG) 2 : Green Belts (1995)

9.8 The existing temporary Albury Park Wellsite is located within the Surrey Metropolitan Green Belt. National planning policy on Green Belt is contained within Planning Policy Guidance Note 2 – Green Belts. Government confirms in paragraph 1.4 that:
‘The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the most important attribute of Green Belts is their openness.’

9.9 It goes on to set out the five key purposes of including land in Green Belts which are:

- 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 urban land.

9.10 Within paragraph 3.1, it sets out that in areas of land covered by Green Belt land use planning designations there is a general presumption against inappropriate development within them. It goes on to state that such development should not be approved, except in very special circumstances.

9.11 Within paragraph 3.11, it acknowledges that minerals can only be worked where they are found and that their extraction is a temporary activity. It therefore need not be regarded as inappropriate development providing high environmental standards are maintained and the site is well restored. The current appraisal well has been maintained to a high standard. The site will be restored back to commercial forestry if the appraisal results are unpromising.

Planning Policy Statement (PPS)7 : Sustainable Development in Rural Areas (2004)

9.12 PPS7 sets out national planning policy advice in relation to development in rural areas. Within paragraph 1 of this document there are several key principles set out that are relevant to the proposals contained within this application. These include:

- Social inclusion, recognizing the needs of everyone;
- Effective protection of the environment;
- The prudent use of resources; and
- The maintenance of high and stable levels of economic growth and employment.

9.13 It goes on to state in paragraph 15 in relation to development in the countryside that :

'Planning authorities should continue to ensure that the quality and character of the wider countryside is protected and, where possible, enhanced. They should have particular regard to any areas that have been statutorily designated for their landscape, wildlife or historic qualities where greater priority should be given to restraint of potentially damaging development.'

9.14 As stated previously, the Albury Park well site is located with the Surrey Hills AONB. The government confirms in PPS7 within paragraph 21 that :

"Nationally designated areas comprising National Parks, the Broads, the New Forest Heritage Area and Areas of Outstanding Natural Beauty (AONB), have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. The conservation of the natural beauty of the landscape and countryside should therefore be given great weight in planning policies and development control decisions in these areas. The conservation of wildlife and the cultural heritage are important considerations in all these areas.

9.15 Within paragraph 22 it states:

'Major developments should not take place in these designated areas, except in exceptional circumstances. This policy includes major development proposals that raise issues of national significance. Because of the serious impact that major developments may have on these areas of natural beauty, and taking account of the recreational opportunities that they provide, applications for all such developments should be subject to the most rigorous examination. Major development proposals should be demonstrated to be in the public interest before being allowed to proceed. Consideration of such applications should therefore include an assessment of:

- (i) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- (ii) the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and*

(iii) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

9.16 In conclusion, it is shown within this Planning Statement that there is a national need for this proposal, that it offers a practical and sustainable solution without the need to construct in an alternative location, and that it will not result in any significant impacts on the environment, this countryside location or cause any significant harm to the character or purposes of this national landscape designation. The Planning Officer report and the accompanying landscape assessment both conclude that there is no overriding case for a refusal of this temporary submission on landscape grounds.

9.17 In addition to this national designation, part of the proposed development at Albury Park is within the Surrey Area of Great Landscape Value. In PPS7, the Government questions the need for such local designations and states in paragraphs 24 and 25, in relation to such local landscape designations, that:

‘The Government believes that carefully drafted, criteria-based policies in LDDs, utilising tools such as landscape character assessment, should provide sufficient protection for these areas, without the need for rigid local designations that may unduly restrict acceptable, sustainable development and the economic activity that underpins the vitality of rural areas.

Local landscape designations should only be maintained or, exceptionally, extended where it can be clearly shown that criteria-based planning policies cannot provide the necessary protection. LDDs should state what it is that requires extra protection, and why. When reviewing their local area-wide development plans and LDDs, planning authorities should rigorously consider the justification for retaining existing local landscape designations.

They should ensure that such designations are based on a formal and robust assessment of the qualities of the landscape concerned.’

Planning Policy Statement (PPS)9: Biodiversity and Geological Conservation (2005)

9.18 PPS9 sets out planning policies on protection of biodiversity and geological conservation through the planning system. The Government’s objectives for biodiversity and geological conservation are as follows:

“to promote sustainable development by ensuring that biological and geological diversity are conserved and enhanced as an integral part of social, environmental and economic development, so that policies and decisions about the development

and use of land integrate biodiversity and geological diversity with other considerations.

• to conserve, enhance and restore the diversity of England's wildlife and geology by sustaining, and where possible improving, the quality and extent of natural habitat and geological and geomorphological sites; the natural physical processes on which they depend; and the populations of naturally occurring species which they support.

• to contribute to rural renewal and urban renaissance by:

- *enhancing biodiversity in green spaces and among developments so that they are used by wildlife and valued by people, recognizing that healthy functional ecosystems can contribute to a better quality of life and to people's sense of well-being; and*
- *ensuring that developments take account of the role and value of biodiversity in supporting economic diversification and contributing to a high quality environment."*

9.19 The proposed appraisal activity utilizes an existing site located within an ecological sensitive environment for a temporary period. The Planning Officer report and the accompanying ecological assessment have both concluded that there is no overriding reason to refuse the application, in biological and geological conservation terms, because there will be no harm to the locality.

Planning Policy Guidance Note 15 – Planning and the Historic Environment (1994)

9.20 The Albury Park Well site is located within a Grade 1 listed registered Historic Park and Garden. There are no additional statutory controls following on from the inclusion of a site in English Heritage's Register of Parks and Gardens of Special Historic Interest. However the Government states in Paragraph 2.24 of PPG15:

'that local planning authorities should protect registered parks and gardens in preparing development plans and in determining planning applications. The effect of proposed development on a registered park or garden or its setting is a material consideration in the determination of a planning application. Planning and highway authorities should also safeguard registered parks or gardens when themselves planning new developments or road scheme'

- 9.21 The location of the appraisal well within this designated parkland has been considered in preparing this application. The Wellsite is contained and there will be no impact on the overall character or setting of this garden from this temporary activity.

Planning Policy Statement (PPS)23 : Planning and Pollution Control 2004

- 9.22 In this statement the Government sets out the role of planning with regard to new developments and the control of pollution. It states in paragraph 2 that:

‘any consideration of the quality of land, air or water and potential impacts arising from development, possibly leading to impacts on health, is capable of being a material planning consideration, in so far as it arises or may arise from or may affect any land use;

– the planning system plays a key role in determining the location of development which may give rise to pollution, either directly or indirectly, and in ensuring that other uses and developments are not, as far as possible, affected by major existing or potential sources of pollution;

– the controls under the planning and pollution control regimes should complement rather than duplicate each other;”

- 9.23 In PPS23 the Government set out how the precautionary principle should be used and applied in relation to new developments and potential pollution or health risks. In paragraph 6 it states:

‘The Government is committed to using the precautionary principle,where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation’.

- 9.24 Within paragraph 10 of the statement it also provides clarity with regard to the role of the various regulatory authorities controlling land-use and emissions. This reads:

‘The planning system should focus on whether the development itself is an acceptable use of land, and the impacts of those uses, rather than the control of processes or emissions themselves. Planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced. They should act to complement but not see to duplicate it.’

Planning Policy Guidance (PPG) 24: Planning and Noise (1994)

9.25 Planning Policy Guidance 24 (PPG24) guides local authorities in England on the use of their planning powers to minimise the adverse impact of noise. It outlines the considerations to be taken into account in determining planning applications both for noise-sensitive developments and for those activities which generate noise

9.26 The Government recognises in paragraph 2 that:

'the impact of noise can be a material consideration in the determination of planning applications'

9.27 The Government identifies that new development, whilst it may be needed and beneficial from an economic stance, can result in increased noise levels. As such, any adverse impacts need to be assessed in relation to other nearby sensitive land uses and the local community. Paragraph 10 states :

'Much of the development which is necessary for the creation of jobs and the construction and improvement of essential infrastructure will generate noise. The planning system should not place unjustifiable obstacles in the way of such development. Nevertheless, local planning authorities must ensure that development does not cause an unacceptable degree of disturbance'

9.28 In paragraph 11 of PPG24 it outlines that the type and duration of noise is also an important consideration:

"Noise characteristics and levels can vary substantially according to their source and the type of activity involved. In the case of industrial development for example, the character of the noise should be taken into account as well as its level. Sudden impulses, irregular noise or noise which contains a distinguishable continuous tone will require special consideration."

9.29 The Government sets out more specific detailed guidance in relation to noise generated from mineral workings in Annex 2 of MPS2 - Controlling and Mitigating the Environmental Effects of Mineral Working Extraction in England.

Controlling and Mitigating the Environmental Effects of Mineral Working Extraction in England – MPS2 (2005)

9.30 Minerals Policy Statement 2 (MPS2) sets out the policies and considerations in relation to the environmental effects of minerals extraction that the Government expects Mineral Planning Authorities (MPAs) in England to follow when preparing development plans and in considering applications for minerals development.

- 9.31 In MPS2, the Government identifies in paragraph 11 the environmental issues that Development plan policies and proposals for minerals extraction and associated development should take into account. These are as follows:

'the impacts of mineral working, such as visual intrusion, dewatering, water pollution, noise, dust and fine particulates, blasting and traffic;

the impacts on landscape, agricultural land, soil resources, ecology and wildlife, including severance of landscape and habitat loss, and impacts on sites of nature conservation, archaeological and cultural heritage value;

the benefits such as providing an adequate supply of minerals to the economy and hence for society (including construction materials needed for the development of national infrastructure and the creation of sustainable communities), creating job opportunities, and the scope for landscape, biodiversity and amenity improvements through mineral working and subsequent restoration; and

the methods of control through planning conditions or agreements to ensure that impacts are kept to an acceptable minimum.'

- 9.32 As part of this planning application the Applicant has assessed the potential environmental effects of the development, and where appropriate measures have been included to control and minimise any adverse effects. The acoustic measures set out in the noise report that will be put in place demonstrate that the drilling rig can comply with Surrey noise standards.

- 9.33 In paragraph 12 of MPS2 the Government goes on to state that:

'Policies and proposals should take into account the level of existing activity and impacts, the duration and nature of proposals for new or further working, and the extent of impacts which a particular site, locality, community, environment or wider area of mineral working can reasonably be expected to tolerate over a particular or proposed period. With respect to an individual site, the effect of all relevant impacts (i.e. of noise, dust, traffic, on landscape etc.) should be considered objectively. Impacts that are acceptable individually should not be regarded as unacceptable in combination without a proper assessment.'

- 9.34 The appraisal site is contained. The proposed activities are temporary and unlikely to cause any additional adverse effects or disturbance to the locality.

- 9.35 The key statement, relevant to the assessment of this proposal, is set out by Government in relation to assessing the environmental effects of mineral workings in paragraph 18 of this statement it reads:

'When preparing the application and in proposing any necessary mitigation measures, the developer should demonstrate that any potential adverse effects have been properly and competently considered. Any adverse effects on local communities, environmental damage or loss of amenity must be kept to an acceptable minimum through the design of the proposals, including the use of planning obligation agreements where appropriate and the attachment of conditions. Where effective mitigation of unacceptable impact by those means is not possible, permission should be refused.'

- 9.36 In this planning statement the Applicant has clearly identified any potential adverse effects on the environment and local community. These affects have been addressed in the design of the proposed development and the supporting statements and accompanying appendices demonstrate that measures have been put in place to ensure that there will be minimal adverse effects on the environment and local communities in relation to noise, and landscape impact.

- 9.37 In paragraph 19 MPS2 the Government supports the use of planning conditions as a tool for controlling environmental effects. It states:

'The use of appropriate planning conditions may sufficiently mitigate any environmental effects so as to enable development to proceed where it might otherwise be necessary to refuse planning permission. The sensitive use of appropriate planning conditions, which address known and anticipated problems and concerns, can provide important environmental safeguards.'

Controlling and Mitigating the Environmental Effects of Mineral Working Extraction in England – MPS2 (2005) – Annexe 2 – Noise

- 9.38 A key issue with this proposed development is associated with concerns about potential noise from drilling operations. General Government guidance in relation to noise from mineral operations states in paragraphs 2.7 and 2.8:

'The key planning principle is that noise emissions should, as far as possible, be controlled, mitigated or removed at source. Proposals for mineral working operations should, therefore include appropriate proposals for the control or mitigation of noise emissions. Those making development proposals and planning authorities considering such proposals should, therefore:

- *consider the main characteristics of the production process and its environs, including the location of noise-sensitive properties;*
- *make and consider proposals to minimise, mitigate or remove noise emissions at the source using best available techniques (BAT) in accordance with the European Commission's BAT Reference Documents, taking account of the control of some quarry processes under the PPC Regulations;*
- *assess the existing noise climate around the site of the proposed operations, including background noise levels at nearby noise-sensitive properties;*
- *estimate the likely future noise from the development and its impact on the neighbourhood of the proposed operations;*
- *monitor noise emissions to ensure compliance with appropriate environmental standards and to enable an effective response to complaints.'*

'Emissions assessments should identify all sources of noise and, for each source, consider the proposed operating locations, procedures, schedules and duration of work for the life of the operation. They should consider what emissions are likely to arise and indicate how and where efforts have been made to control, mitigate or remove these at source. The level and character of the existing noise environment and the location of noise-sensitive properties will enable the necessary noise level goals to be incorporated in the design of proposed operations. Monitoring is required to compare changes in noise level and character caused by the operation to the design goals and to manage them in order to achieve those goals. There must be effective liaison with the affected community, and complaints should be dealt with promptly.'

- 9.39 The Applicant has sought to comply with the above criteria as is set out in more detail in the supporting noise report.

Mineral Planning Policy Statement (MPS)1 : Planning and Minerals (2006)

- 9.40 Mineral Planning Statement 1: Planning and Minerals (MPS1) and its accompanying Practice Guide were published in November 2006. MPS1 replaced MPG1: General Considerations and the Development Plan system, MPG6: Guidelines for Aggregates Provision in England, and DOE Circular 2/85: Planning Control over Oil and Gas Operations.

9.41 On the front of both documents there is a statement that emphasizes the importance of minerals to our way of life and endorses the mineral planning system. It reads as follows:

'Minerals are essential for development and through that for our quality of life and creation of sustainable communities. Minerals planning ensures that the need for minerals by society and the economy and the impacts of extraction and processing on people and the environment are managed in an integrated way'

9.42 MPS1 contains 12 national objectives and 63 policies for minerals planning under nine sub-headings. Of these Exploration, Protection of heritage and countryside, Supply, Environmental Protection and restoration are relevant to the current application.

9.43 Annex 4 specifically provides guidance for 'On shore oil and gas and underground storage of natural gas'. The annex recognises the decline in off shore reserves and the need to maximise the potential of reserves in an environmentally acceptable manner.

9.44 Paragraph 3.7 is clear that the future development aspirations of an oil and gas company should not be material in the consideration of an exploration application.

9.45 Paragraph 3.13 deals with appraisal proposals. It states :

'...it may be necessary to attempt to define the extent of the find by drilling further wells at other suitable sites in the area. Until the extent of a find has been delineated, it is difficult to evaluate the various options available or to assess the viability and potential environmental effects of commercial exploitation.'

9.46 The paragraph goes on to set out that where a company is sufficiently confident about future development opportunities then these should be explained to the MPA through the supply of information. However, Paragraphs 3.7 and 3.13 provide contradictory advice as to whether the long term sustainability of a site for production purposes when considering an appraisal application is a material planning consideration because the latter states:

'...This consideration should take into account the long term suitability of the site since such wells may subsequently be required for production purposes. The other factors listed above for exploration wells are equally relevant to appraisal wells...'

9.47 Section 4 of the annex deals with the Underground Storage of Natural Gas. This stresses the importance of storage facilities for supply and delivery. In paragraph 4.7 it sets out the general issues that MPAs should take into account, these include:

- the national energy benefit of the proposal; and
- the likelihood that suitable onshore locations for gas storage will be very limited in number, due to the lack of suitable geographical features for underground gas storage, so that alternative possibilities may not be available.

Planning and Minerals : Practice Guide (2006)

9.48 The guide should be read alongside MPS1. It offers examples of good practice and background information on oil and gas and underground gas storage. Paragraph 13 recognises that the supply of minerals has a number of characteristics. These include:

- minerals can only be worked where they occur, so location options for the economically viable and environmentally acceptable extraction of minerals may be limited;
- working is a temporary use of land;
- working often has environmentally acceptable effects that can be mitigated, but not generally eliminated; and
- following working, land should be restored to make it suitable for beneficial after-use and to avoid dereliction.

Supplement to PPS1 - Consultation PPS : Planning and Climate Change - December 2006

9.49 This consultation document seek views and comments on a draft Planning Policy Statement which when finalised, will supplement PPS1. The supplement is intended to focus, reinforce and clarify the role of the spatial planning system in meeting the objectives of UK Government's climate change programme and energy policies.

Planning Policy Statement 25: Development and Flood Risk

9.50 This statement advises on how flood risk should be considered at all stages of the planning and development process.

10.0 THE DEVELOPMENT PLAN

Regional Planning Policy

RPG9 – Regional Spatial Strategy – Waste and Minerals

10.1 RPG9 has now become, with some revisions, The Regional Spatial Strategy (RSS). These revisions include most recently alterations to the minerals and waste policies in June 2006. The RSS is now under review as the South East Plan (SEP). The public examination into the review was from November 2006 to March 2007. The following RSS policies are relevant in the determination of this application :

- Policy E1 – Areas of International and National Importance for Nature Conservation, Landscape and Cultural Value
- Policy E2 – Biodiversity
- Policy E3 – Green Belts
- Policy E5 – Woodland Habitats
- Policy E7 – Air and Water Quality

Surrey Structure Plan 2004

10.2 The Surrey Structure Plan 2004 is currently “saved” within Surrey’s Mineral and Waste Development Framework and provides the strategic planning framework for minerals and associated development. The 2004 Structure Plan is in general conformity with Regional Planning Guidance for the South East (RPG9). The South East England Regional Assembly (SEERA) is currently reviewing which policies in the Surrey Structure Plan to save beyond 2007. The County Council and District Council have advised SEERA that only Policies SE3, DN16 and DN18 should not be saved. The Structure Plan policies on AONBs and, Minerals working are still relevant in the determination of this proposal. The following policies are also relevant:

- Policy DN17 Mineral Workings and Restoration
- Policy SE2 Renewable Energy and Energy Conservation
- Policy LO4 The Countryside and Green Belt
- Policy SE8 Landscape
- Policy SE9 Trees and Woodland
- Policy DN2 Movement Implications of Development

- Policy SE5 Protecting the Heritage
- Policy SE7 Nature Conservation

Guildford Borough Council Local Plan 2003

10.3 The Guildford Borough Plan, adopted in 2003, contains policies that guide development in the district. Within the Plan the site is situated within the Metropolitan Green Belt where Policies RE1 and RE2 apply, an Area of Outstanding Natural Beauty where Policy RE5 applies and an Area of Great Landscape Value where Policy RE6 applies. The site is also located within a Site of Nature Conservation Importance and within a Historic Park and Garden where Policies NE3 and HE12 apply.

10.4 The adopted version of the plan was saved for three years until mid 2006. The new Guildford Local Development Plan Framework is taking longer to prepare than originally anticipated and therefore Guildford Borough Council applied to the Secretary of State to have many of their local plan policies saved beyond September 2007. The following 'Saved' policies of the plan are relevant in the determination of this application :

- * Policy G1(3) – Protection of Amenities Enjoyed by Occupants of Buildings
- * Policy G1 (12) – Safeguarding and Enhancement of the Landscape and Existing Natural Features

- Policy G3 – Development Concerning Hazardous Substances
- Policy G5 (2) – Scale, Proportion and Form
- Policy RE2 – Development in the Green Belt
- Policy RE5 – Area of Outstanding Natural Beauty
- Policy RE6 – Area of Great Landscape Value
- Policy HE10 – Development which affects the setting of a Conservation Area
- Policy HE12 – Historic Parks and Gardens

Surrey Minerals Local Plan 1993

10.5 The Surrey Minerals Local Plan was adopted in 1993. The Local Plan contains a generic policy, Policy 1 environmental and amenity protection, which seeks to control the negative effects of proposed development on residential amenity and the environment per se. The Local Plan also contains three hydrocarbon policies,

relevant to the consideration of this proposal to appraise the underlying geology. Surrey County Council applied to the Secretary of State in March 2007 to save these policies for an extended period, beyond September 2007. These are:

Policy 15 - Exploratory Drilling for Hydrocarbons – which reads:

‘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.’

Policy 16 - Hydrocarbons Appraisal Drilling – which reads:

‘Following the drilling of an initial exploratory borehole, appraisal drilling and subsequent testing will only be permitted where the County Council are satisfied that:-

- (i) The proposed development is necessary to confirm the nature and extent of hydrocarbon resources or to assess the feasibility of their recovery; and:-*
- (ii) As far as possible the proposal forms part of a scheme for the appraisal of the field, and:-*
- (iii) The proposal is in accord with relevant Structure Plan and Mineral Local Plan policies.*

Proposals for the use of exploratory well sites for appraisal or production will be treated strictly on their merits. There will be no presumption in favour of their use for such purposes.’

Policy 17 – Commercial Production

Commercial production of hydrocarbons will only be permitted where the County Council are satisfied the proposals:-

- (i) Are consistent with an acceptable scheme for the development of the field as a whole and where appropriate any other known hydrocarbon resources in the area; and:-*
- (ii) Involve the minimum amount of plant and equipment necessary both for the extraction of hydrocarbons and such processing as is required prior to their transport to a refinery or treatment plant.*

10.6 The Plan also contains a generic policy (policy 1) that contains a list of potential impacts resulting from mineral working that will need to be addressed in an application in order to protect the environment and local amenities. This was one of the policies that the Planning Officer Report concluded that the previous application should be refused on.

11.0 PLANNING CONSIDERATIONS

- 11.1 It was recognised in the Planning Officers Committee Report that the 'key issues' in determining the application was whether there is a need for the development, whether it is of national and/or local interest and whether there are any 'alternatives.' As set out in MPS 1, gas exploration and appraisal is in the National Interest. The proposed appraisal is essential to establish vital geological information associated with gas exploitation, or potential future gas storage capabilities. The Government, in its Energy White Paper, Energy Review and a series of ministerial statements could not give a more clearer steer that there is a need and considerable material weight should be given to such a development.
- 11.2 The principle of exploration and appraisal is already established at the site through the prevailing temporary consent. The proposal is necessary to enable the Applicant to establish the viability of the underlying strata following the seismic work that has already been carried out. There is no other way this can be carried other than by drilling. It is therefore contended that the proposal is consistent with the provisions of part (i) of Policy 16 of the Surrey Minerals Local Plan.
- 11.3 It is considered environmentally preferential to utilise an existing site rather than constructing a new one in an alternative location with all its associated inherent disturbance and carbon emissions. Of the potential alternative sites available that have been examined none would compare as favourably as the existing site. It is therefore considered that the proposed development is consistent with the principles of sustainability set out by the Government in PPS1, PPS7 and MPS1 in that it would utilise an existing facility without the need to construct a new one, and could indirectly contribute to sustaining our way of life if an exploitable gas reserve is identified, or that the underground strata is found to have potential for gas storage.
- 11.4 The existing site is located within the Metropolitan Green Belt where strict control over development is applied. The Green Belt is essentially a spatial designation. Indeed, the principal purpose of Green Belt policy is to protect the openness and intrinsic qualities of the countryside. The proposed development involves temporary mineral activity that guidance acknowledges is not inappropriate if high environmental standards are maintained. The Applicant recognises the sensitivity of the location within which it is proposing the development and accordingly has carried out a robust appraisal of the possible impacts. It also enjoys an excellent track record at the site. It is therefore contended that the proposal is consistent with the provisions

- of PPG2, and Development Plan policies E3 of the RSS, Policy LO4 of the Structure Plan, and Policy RE2 of the Guildford Local Plan.
- 11.5 The site is also located in an AONB. However, the existing compound is already exceptionally well screened by the surrounding mature woodland. This will ensure that there will be minimal visual impact as a result of the proposals. Only the top of the temporary drill mast will be visible and only then from long distances. It is not considered that this will adversely affect the ambience of the countryside particularly given the very temporary nature of the proposal.
- 11.6 At the time of the previous submission the Landscape and Visual Assessment, forming part of the application, was criticised for excluding views from St Martha's Hill. However, in the Officers Report at paragraph 13 it was acknowledged that from this location it was not possible to clearly distinguish the telephone masts close to the site with the naked eye. The landscape and visual chapter in the accompanying Environmental Appraisal has included this viewpoint and has concluded that the effects of the proposals from it would be minor/not significant and temporary.
- 11.7 The need for the proposal and the alternatives available has already been dealt with above. The landscape and visual chapter of the Environmental Appraisal has considered the magnitude of landscape change on the character of the AONB and concluded that this will be small, and that the significance of the impact on the location minor. It is therefore contended that the proposed development would not be contrary to the provisions of PPS7 and would comply with Development Plan policies Policy E1 of the RSS, Policies SE5 and SE8 of the Structure Plan, and policies G1(12), RE5 and RE6 of the Guildford Local Plan.
- 11.8 The impacts associated with the development would be minimal and will largely relate to the short term intensive drilling operations. The Company has invested in a state of the art rig that will enable the drilling process to take place with the greatest of sensitivity. Effort has been made to individually test every part of the rig to ensure minimum emissions of noise. It has been demonstrated in the accompanying noise chapter of the Environmental Appraisal that local amenities can be protected if a programme of acoustic mitigation is implemented. These measures will enable the proposals to be compliant with the prevailing guidance contained in PPG24 and MPS2 and Development Plan policies G1(3) of the Guildford Local Plan and Policy 1 of the Surrey Minerals Plan.

- 11.9 The proposed temporary development has been carefully designed in order to avoid the need to extend the drilling area outside the perimeter of the existing compound. As mentioned above the intensive 18 week drilling phase has the potential to have an adverse effect on the environment. The proposal will not involve conventional flaring. A Clean Enclosed Burner will be utilised during the period of well testing and appraisal. The Environmental Appraisal report attached to this statement demonstrates that as long as the burner is operated within the manufacturers design limits to ensure efficient combustion then emissions will be minimised.
- 11.10 There should therefore be minimal impact on the surrounding trees and woodland and there inherent woodland habitats, or indeed the general ambience of the historic landscape of the area. It is therefore contended that the proposals will be compliant with the prevailing guidance contained in PPS1, PPS7, PPS9, PPG15 and MPS2, and Development Plan policies E1, E2, E5 and E7 of the RSS, Policies SE5, SE7 and SE9 of the Structure Plan, Policies G1(2), HE10 and HE12 of the Guildford Local Plan, and Policy 1 of the Minerals Local Plan.
- 11.11 The traffic assessment carried out for the application has concluded that no significant impacts are predicted during the drilling phase of the proposed development. Traffic associated with this part of the temporary proposal is not expected to generate any conflict with vulnerable road users. It is therefore contended that the proposal is compliant with Structure Plan Policy DN2 and Development Plan Policy 1 of the Surrey Minerals Local Plan.
- 11.12 The guidance set out in PPS25 has been taken into account in the Environmental Risks chapter of the Environmental Appraisal. This concluded that the residual risk of flooding to the appraisal drilling activity and personnel and the risk to neighbouring land-uses due to the presence of the proposed drilling activity are both insignificant. The proposal is therefore compliant with the provisions contained within PPS25.
- 11.13 Public concern and fears relating to safety at the site and the risk of accidents were raised during the previous submission. The Environmental Risks chapter of the Environmental Appraisal robustly demonstrates that the risk of contamination to the environment during operations will be minimal. The question of proportionality in terms of risk was acknowledged in paragraph 195 of the officers report to committee (Annex 1) on the former submission where was concluded that material weight should be attributed to the 'Health and Safety Executive's expert view that there are no health and safety objections to the proposal'.

11.14 As established in PPS23 the role of the planning system is to complement and not duplicate other regulatory controls. Health and safety, waste management and contamination are all matters that are regulated by other bodies.

12.0 CONCLUSIONS

12.1 Chapter 11 of the Environmental Appraisal sets out the key potential impacts of the development and the mitigation measures to be implemented. The committed mitigation measures include:

- To mitigate the impact of noise and vibration a noise barrier will be erected along the south-east boundary of the wellsite during the drilling phase, and good management practices will be implemented and monitoring systems will be put in place. To minimise the numbers of days flaring, it is proposed to flare on a 24 hour basis as this is possible without breach of Surrey guideline night-time noise limits.
- To mitigate the impact of traffic either a wheel-wash or road sweeper will be deployed.
- To mitigate against any harm to local tourism or recreation only competent and qualified contractors will be used and a project management team will oversee the works.
- Emissions from the 'clean enclosed burner' will be minimised by the operating of the burner within the manufacturer's design limits.
- To mitigate the effect of ecology a breeding bird survey will be undertaken prior to commencement of the operations and an amphibian rescue scheme will be implemented.
- To reduce the environmental risk of the development the drilling contractor will be required to prepare an Environmental Management Plan and the Applicant will also prepare a Site Waste Management Plan.
- To mitigate against the impact of flooding the current drainage system will be maintained.

12.2. Whilst there has been considerable public concern about the previous proposals the development has to be put into context. It simply involves drilling over a very temporary period under the strictest of controls followed by an activity which is in impact terms, no different to the existing operation.

12.3 The principle of hydrocarbon exploration and appraisal is already established at Albury Park by virtue of the past and extant planning consents on the land. The current proposal seeks to gain further geological information in accordance with

Government advice. The key element of the proposal that has potential to cause any harm to the environment or local amenities is the drilling operation.

- 12.4 A detailed noise assessment has been carried out. The conclusions of this indicate that if the recommended mitigation measures are put in place then the temporary activities can be conducted without any adverse effects on local amenities.
- 12.5 It has already been acknowledged by planning officers that there are no other issues that would warrant a refusal.

13.0 RECOMMENDATION

- 13.1 The application presents an opportunity for the Applicant to maximise it's knowledge of the underlying geological structure in accordance with Government Policy and in the wider public interest.
- 13.2 The principle of hydrocarbon exploration and drilling is already established.
- 13.3 The proposals conform with prevailing national guidance and land use policies.
- 13.4 In light of the above it is respectfully requested that the application be approved by the County Council.