

MINUTES of the meeting of the **PLANNING AND REGULATORY COMMITTEE** held at 10.30 am on 11 September 2019 at Ashcombe Suite, County Hall, Kingston upon Thames, Surrey KT1 2DN.

These minutes are subject to confirmation by the Committee at its next meeting.

Members Present:

*Present as expected

- *Mr Tim Hall (Chairman)
- *Mr Edward Hawkins (Vice-Chairman)
- *Mr Saj Hussain
- *Mrs Bernie Muir
- *Mrs Rose Thorn
- *Mr Stephen Cooksey
- *Mr Ernest Mallett MBE
- *Mrs Penny Rivers
- Mrs Mary Angell
- Dr Andrew Povey
- Mr Keith Taylor
- *Mrs Barbara Thomson

31/19 APOLOGIES FOR ABSENCE AND SUBSTITUTIONS [Item 1]

Apologies have been received from Keith Taylor, Andrew Povey and Mary Angell. Barbara Thomson will be substituting for Mr Taylor.

32/19 MINUTES OF THE LAST MEETING [Item 2]

The Minutes were APPROVED as an accurate record of the previous meeting.

33/19 PETITIONS [Item 3]

There were none.

34/19 PUBLIC QUESTION TIME [Item 4]

There were none.

35/19 MEMBERS' QUESTION TIME [Item 5]

There were none.

36/19 DECLARATIONS OF INTERESTS [Item 6]

There were none.

37/19 MINERALS/WASTE RE18/02667/CON: HORSE HILL WELL SITE, HORSE HILL, HOOKWOOD, HORLEY, SURREY, RH6 0HN [Item 7]

An update sheet was tabled at the meeting and is attached as Annex 1 to the minutes.

Officers:

Caroline Smith, Interim Planning Group Manager
Stephen Jenkins, Interim Planning Development Manager
Duncan Evans, Senior Planning Officer
Nancy El-Shatoury, Principal Lawyer
Helen Forbes, Lawyer

Speakers:

Mr James Knapp, made representations in objection to the application. The following key points were made:

- Earthquakes are not addressed by the officer's report.
- Suggested HH-1 Borehole drilled through a fault
- Organisations that are responsible for monitoring earthquakes are not taking this matter seriously. Elected representatives therefore need to take this matter seriously.
- Edinburgh University believe if drilling continues earthquakes will continue.
- Earthquakes were triggered by surface activity which is a responsibility of the council.

Mr Julian Everett spoke on behalf of Vicki Elcoate and made representations in objection to the application. The following key points were made:

- Surrey County Council have declared a climate emergency but are considering an application for extracting fossil fuels for 25 years.
- This application is not the change residents want for a sustainable county. The Stephenson High Court judgement on the impact of climate change threw out 'the presumption in favour of oil and gas'.
- The cumulative impact from greenhouse gases is massive and is underrepresented by the applicant.
- Efforts in Surrey for positive initiatives are utterly pointless if this application goes ahead.

Ms Lynette von Kaufmann, made representations in objection to the application. The following key points were made:

- Newdigate resident- there have been around 172 tremors recorded since 1 April 2018.
- Residents have felt 13 of the earthquakes, an earthquake with a magnitude of 3.2 was felt by 1600 people.
- Damage to property has been recorded, mostly crack to walls and brickworks- worried house prices will fall and insurance premiums will go up.
- If oil well activity continues imagine what will happen with earthquakes when more are approved. The decision should be deferred until conditions around things such as having a full 3D seismic survey, traffic light system and ongoing seismic monitoring are put in place.

Ms Pat Smith, made representations in objection to the application. The following key points were made:

- Have lived in Dorking for over 48 years and have concerns around the conditions.
- Involved in monitoring oil operations at Brockham alongside the council. Concerns around the reliability of the operator and want detailed and precise conditions.
- There should be a pre-commencement condition around the monitoring of methane gases throughout the project and the water reinjection element of the application should be removed.
- There should be a break clause every five years with the application and there should be a condition on community engagement.

Mr Chris Lowe, made representations in objection to the application. The following key points were made:

- Lives within 800 yards from the site- Stephenson case declares key provision within the NPPF illegal- ask council to seek independent legal advice on this matter.
- Council is seeking to reduce emissions but this permission would not be consistent with this policy.
- Assume financial resilience of the applicant but what will what happen if there are issues with the site after the applicant leaves. Applicant should provide a bank bond to the authority.
- Ask that seismic monitors stay in place throughout the duration of the application.

The Applicants, Mr Stephen Sanderson, Mr Matt Cartwright and Agent, Mr Nigel Moore, raised the following key points:

- Presents a viable site in compliance with the Surrey Minerals Plan. Hydrocarbon production will make the UK more resilient for the future and make us less dependent on imports.
- With regards to climate change, it will take time to develop the alternatives to oil and gas. The site will contribute to reducing carbon emissions as activity will be taking place on site. Gas from the site will be converted to electricity and returned to the national grid.
- 55% of residents support the proposals at Horse Hill as detailed within the officer's report.
- Three independent scientists have confirmed that earthquakes in the area are not related to activity on site. There have been no objections from statutory consultees.
- A number of residents from the local area are employed by the site and engagement with the local community has accelerated over the years. Will ensure that local community benefit from the economic benefits from the site.

The Local Member, Kay Hammond could not attend the meeting but asked for a statement to be read out by the Chairman on her behalf:

“It has recently become apparent that the financial position of the applicant may be somewhat less than ideal. I agree with the concerns raised by Salfords & Sidlow Parish Council about the finances of the parent company, UK Oil & Gas (UKOG) who now own 85% of the applicant, Horse Hill Developments Ltd (HHDL).

UKOG have just bought 35% of HHDL for £12m, financed by cash and ordinary shares plus a £5.5m Convertible Loan. The terms of the Convertible Loan are to issue ordinary shares at a 10% discount to their market price at the time of conversion over the next two years. This is “commonly known a Death Spiral Convertible” Defined in Wikipedia, as the effect it has on the share price is to constantly drive it downwards.

It has been a condition of previous permissions for work at this site that the land must be reinstated and the same is included in summary report for this application. If the financial position of the applicant is as feared and oil extraction rates are less than expected, or if a negative event occurs, the applicant may find it nigh on impossible to meet the costs of any environmental reinstatement conditions. It must be remembered that the environmental impact of a negative event may extend well beyond the boundaries of the site and incur considerable extra expense to rectify.

Salfords & Sidlow Parish Council wrote to explain the reasons for this concern and why it is essential for a Bond to make sure funds are in place to pay any costs of meeting the conditions if permission is granted for any further operations this site. The value of any bond should consider the time scale of this site, and be adequate for the full reinstatement of the site at any time within the next 25 years.

Paragraph 205e of the NPPF (National Planning Policy Framework) says ‘Bonds or other financial guarantees to underpin planning conditions should only be sought in exceptional circumstances’. I would respectfully suggest that there is good reason to believe such exceptional circumstances may exist here.

When the financial position has been independently scrutinized, a fully informed decision can be made as to whether permission should be granted and if a bond is required as a condition. Failure of the applicant to reinstate the site would leave an environmental “Black Hole’ in the green belt.

The County Council must make their decision on all the relevant information and, at the moment much of the financial information is not clear. I therefore would ask the Committee to defer the decision on this application until the financial position of the applicant has been clearly established.

A commercial organization must not be allowed to play roulette with the environment when there is a clear and considerable risk that the County, and ultimately Surrey’s tax payers will have to pick up the bill”.

The Vice-Chairman of the County Council, Helyn Clack, made the following points:

- There should be a condition in the application that earthquakes in the area are monitored by the applicant. Residents would be supportive of this condition.

- It is frightening for residents that seismology is not being addressed.

Key points raised during the discussion:

1. The Chairman confirmed that the committee visited the Horse Hill Well Site on 05 September 2019 (6 committee members attended and 1 substitute member attended).
2. The report was introduced by the Senior Planning Officer who updated the committee on the application.
3. A member of the committee asked for clarity around the concerns raised by residents on earthquakes. It was explained by officers that planning practice guidance states which regulators are responsible for the various elements of hydrocarbon development. The County Planning Authority grants planning permission for use of the land but the responsibility for assessing risks with earthquakes sits with the Oil and Gas Authority (OGA).
4. The Interim Planning Development Manager explained that a workshop had been set up by the OGA which included expert geologists from the British Geological Survey. It was concluded that there was no link between the earthquakes and the activity taking place at Horse Hill. It was explained that the OGA has the powers to stop, monitor and control seismic activity.
5. A member queried if the committee had the power to include a recommendation in the report around seismic activity. The Interim Planning Development Manager explained that because seismic activity fell outside the remit of the planning authority it would be difficult to impose a recommendation on this. It was added that the oil and gas industry was heavily regulated and that there were a number of bodies (OGA, EA, HSE) in place to monitor this development.
6. There was a discussion around securing a bond from the applicant to ensure the site is fully restored after the 25 year period and if this could be included within the application conditions. It was explained by officers that the financial capacity of the company was considered by the OGA and it would be unreasonable to ask for a bond without valid reasons.
7. It was confirmed that comments from Reigate and Banstead Borough Council had not been received and they had been chased several times for this. Comments from Mole Valley District Council had been responded to within the main body of the report.
8. During the meeting there was a lengthy discussion around the council's recent climate emergency declaration and whether this application was in line with this new policy. The Interim Planning Development Manager stated that the application being considered by the committee had to be determined in accordance with the development plan and current government policy.
9. With regards to the Stephenson case, the county lawyers present at the meeting made the following statement, "The Court found that the consultation exercise undertaken prior to revising the National Planning Policy Framework to add paragraph 209(a) relating to shale fracking was unlawful because;
 - (1) the Secretary of State was not undertaking the consultation at a formative stage;
 - (2) he had no intention of changing his mind about the substance of the policy; and

(3) he had failed to take into account scientific evidence put forward by the claimant bearing upon a key element of the evidence base for the proposed policy and its relationship to climate change effects.”

The paragraph had provided:

“Mineral Planning Authorities should recognise the benefits of on-shore oil and gas development, including unconventional hydrocarbons, for the security of energy supplies and supporting the transition to a low-carbon economy; and put in place policies to facilitate their exploration and extraction

Paragraph 209 a was subsequently quashed. The rest of the revised NPPF remains in place including the remainder of paragraph 209 relating to oil, gas and coal exploration and extraction. A written Ministerial Statement made to the Commons and the Lords in May 2019 confirms:

For the avoidance of doubt the remainder of the National Planning Policy Framework policies and, in particular, Chapter 17 on ‘Facilitating the Sustainable Use of Minerals’ remain unchanged and extant. For the purposes of the National Planning Policy Framework, hydrocarbon development (including unconventional oil and gas) are considered to be a mineral resource.

Specific policy on the planning considerations associated with their development is set out at paragraphs 203-205 and the remainder of 209 of the National Planning Policy Framework. In particular, paragraph 204(a) of the National Planning Policy Framework states that planning policies should “provide for the extraction of mineral resources of local and national importance” with paragraph 205 stating that “[w]hen determining planning applications, great weight should be given to the benefits of mineral extraction, including to the economy.

In addition, the Written Ministerial Statements of 16th September 2015 on ‘Shale Gas and Oil Policy’ and 17th May 2018 on ‘Planning and Energy Policy’ also remain unchanged and extant. The Written Ministerial Statements sit alongside the National Planning Policy Framework. Planning Practice Guidance is also unaffected by the ruling. This suite of policies and guidance remain material considerations in plan making and decision taking for hydrocarbon development and they should be afforded appropriate weighting as determined by the decision maker.”

10. There was another short discussion around earthquakes and the concerns of local residents. The Interim Planning Development Manager restated that there was no evidence that the Horse Hill site was contributing to these. The British Geological Survey (BGS) confirm that seismic activity in the area is naturally occurring.
11. A member of the committee reminded members that reaching zero net carbon emissions by 2050 was a target and that it would take time to reach this target. In the meantime hydrocarbons were vital to the national fuel supply.

12. A member of the committee raised queries in respect of water environment and ecology issues. The Senior Planning Officer confirmed that no objections had been received from technical consultees on these matters subject to recommended conditions where necessary.
13. A member of the committee stated that hydrocarbons were a requirement for western society especially with the high standard of living we have. It was important the country produces its own hydrocarbons rather than relying on imports which increase carbon emissions. It was important the committee stay within their powers, if the committee go outside their remit there is a chance the applicant will appeal and costs will be incurred against the authority.
14. Officers confirmed that the conditions pertaining to the permission if granted would be reviewed automatically after 15 years by the County Planning Authority.
15. A member of the committee sought to defer the application on the grounds that further information needed to be sought from the OGA on earthquakes in the area. The Interim Planning Group Manager reminded members that the issue of earthquakes fell outside the authority's remit and the committee needed to be confident that all other agencies in respect of the application were doing their jobs.
16. A committee member reminded colleagues that the applicant could appeal any deferral on grounds of non-determination which would mean an inspector would make decisions in respect of the application.
17. Mr. Cooksey proposed a motion to defer the application on grounds that further information was required from the OGA on earthquakes in the area. This was seconded by Ms Rivers. There was two votes for and seven votes against. The motion was therefore lost.
18. The Chairman moved the recommendation to permit the application subject to the conditions and informatives listed on pages 74-85 of the report and the amended conditions and reasons in the update sheet including an additional informative encouraging community engagement and for the applicant to monitor seismic activity on the site. There were seven votes for and two votes against. Therefore the application was permitted.

RESOLVED:

That planning application **RE18/02667/CON** is **PERMITTED** subject to the conditions and informatives listed on pages 74-85 of the report and the amended conditions and reasons in the update sheet including the following two informatives,

- a. That the applicant is advised that regular community engagement in respect of this site be undertaken (recommended by the Planning and Regulatory Committee), and may include the setting up of a local liaison group, which would provide a forum for discussing operational issues between the operator, the County Council (as Planning Authority), interested parties and representatives of the local community.
- b. That the Planning and Regulatory Committee has advised that the applicant liaises with the British Geological Survey to ensure that earthquake monitoring continues, by providing funding if necessary.

The operator is advised that they share this monitoring data with all the regulatory authorities involved with this site.

38/19 DATE OF NEXT MEETING [Item 8]

The date of the next meeting was noted.

Meeting closed at 12:16pm

Chairman

UPDATE SHEET

MINERALS/WASTE RE18/02667/CON

Horse Hill Well Site, Horse Hill, Hookwood, Horley, Surrey RH6 0HN

Retention and extension of an existing well site, HH1 and HH2 wells, and vehicular access to allow: the drilling of four new hydrocarbon wells and one water reinjection well; the construction of a process and storage area and tanker loading facility; new boundary fencing; well maintenance workovers and sidetrack drilling; and ancillary development enabling the production of hydrocarbons from six wells, for a period of 25 years.

Please note the Committee Report should be amended / corrected as follows:

CONSULTATIONS AND PUBLICITY

Parish/Town Council and Amenity Groups

Paragraph 77

The Weald Action Group - additional comments have been received in respect of: climate change; need; fracking; acidisation and cumulative impacts. Comments have also been made, questioning the adequacy of the conditions with regard to controlling the above issues.

Additional responses from local Councillors

The local Member Cllr Kay Hammond has raised concerns regarding the financial position of the applicant and recommends that a bond is in place to re-instate the site.

Officer comment

The Oil and Gas Authority (OGA) regulates the licensing of the exploration and development of hydrocarbon resources, through production consents and development programme approvals, and for every operator the OGA examines the operator's competency, their financial viability and financial capacity.

Comments have also been raised by Cllr Helyn Clack (neighbouring division) forwarding comments from local residents and groups asking for further conditions over the development, taking into account climate change and seismicity. A response has been received from Cllr Lesley Bushnell, raising concerns in respect of earthquakes, attaching an online petition with 292 signatures.

Officer comment

The officer's report is very comprehensive in addressing the need for this production stage of hydrocarbon development and takes into account climate change. Para.159 of the report concludes that the '*Government makes it clear that oil and gas remains an important part of the UK's energy mix. Policies recognise the continuing importance of fossil fuels but aim to manage reliance on them, their potential environmental effects and the risks associated with security of supply. While the Government manages the transition to a low carbon energy mix this will mean that oil and gas remain key elements of the energy system for years to come (especially for transport and heating). Based on the UK Governments current policy, it is also recognised that the proposed development would not be in conflict with the Government's climate change agenda.*'

Planning conditions need to meet certain tests, the Government policy states '*planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects under planning*'.

A condition suggesting a break in the development for a review to assess whether oil production is still required would not accord with the above planning tests. The condition is not necessary, nor enforceable or reasonable in the context of the development plan. There is currently no planning policy to support such a planning condition or restriction on the development.

A condition relating to seismicity and earthquakes is outside the controls of planning, therefore again not meeting the above tests. The area is currently being monitored by the British Geological Survey (BGS), who has deployed additional surface seismic sensors across the area to help provide an independent assessment of the seismicity. As a result of this monitoring, independent reports have concluded that there is no link between the seismicity recorded in the area and the hydrocarbon exploration, as such these events are concluded to be naturally occurring, and are not induced by human activities. It would therefore be unreasonable to restrict the operations of the applicant on this basis. In addition, the role of controlling induced seismicity falls to the Oil and Gas Authority (OGA), and they have the powers to enforce operators to monitor seismicity and stop development, as they have done in Lancashire. However, I will reiterate that the hydrocarbon development proposed at Horse Hill is not unconventional and does not involve hydraulic fracturing, therefore is not comparable to the hydrocarbon development taking place in Lancashire.

Summary of publicity undertaken and key issues raised by the public

Paragraphs 81 to 83 (*amended number of representations with additional text*)

The total number of written representations is 1667, with 726 objecting, 921 in support, with 20 making comments. One petition with 438 signatures was received, raising concerns about earthquakes.

NEED FOR HYDROCARBON DEVELOPMENT

Paragraph 134 (*is replaced as follows, amendment in bold*)

The Local Parish Council Salfords and Sidlow have objected to the application on the grounds the application does **not** meet climate change targets and the policy tests of the NPPF following the high court ruling striking out paragraph 209 (a) supporting oil and gas development. Therefore the local planning authority should consider reasonable and recent scientific evidence in relation to climate change and CO₂ and methane emissions.

CONCLUSION

Paragraph 434 (*is replaced as follows, amendment in bold*)

The activity associated with constructing operation at the beginning and end of the development and undertaking drilling production would give rise to some temporary impact on amenity especially when considering the rural nature of the locality. Nevertheless, mineral working is a temporary activity, albeit covering a 25 year period. The concerns of local residents are acknowledged and have been carefully considered. **Having had regard to the environmental information contained in the Environmental Statement, national and development plan policy, consultee views and concerns raised by local residents objecting to the proposal, and taking into account need, Officers consider that, subject to the imposition of conditions, together with controls through other regulatory regimes, the development would not give rise to unacceptable environmental or amenity impacts and the development is consistent with the NPPF and the development plan, the application may therefore be permitted.**

RECOMMENDATION

(Insert the following text before the conditions)

IMPORTANT CONDITION NUMBERS 8, 11, 16, 19, 24 MUST BE DISCHARGED PRIOR TO THE COMMENCEMENT OF THE DEVELOPMENT

CONDITIONS

Conditions to be replaced as follows (amendments in bold):

Time Limits

Condition 4

The development hereby permitted shall cease no later than 25 years from the date of the implementation of the planning permission referred to in Condition 3 above or the depletion of the reservoir, whichever is the sooner. All buildings, plant and 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 from the application site and the site shall be fully restored to a condition suitable for agriculture and woodland in accordance with the details set out in Condition **29**. Notwithstanding this, any plant or equipment required to make the site safe in accordance with the OGA requirements at the time and agreed with the County Planning Authority, may remain in position.

Condition 5

Prior written notification of the date of commencement for each phase of development works **(Phases 1-5 as described at Section 3 of the Planning Statement and Environmental Report)**, including workovers and sidetracks, hereby approved shall be sent in writing to the County Planning Authority not less than seven days before such commencement.

Noise

Condition 11

Prior to the commencement of the development hereby permitted a noise monitoring plan (NMP) shall be submitted to and approved in writing by the County Planning Authority (CPA), taking into account the noise limits set in Conditions **12 and 13**. The NMP shall include a methodology for undertaking noise surveys, with the results of the monitoring reported to the CPA within 14 days of monitoring. Should the site fail to comply with the noise limits, within 14 days of any breach of the noise limits, the applicant shall submit a scheme for the approval in writing **by the CPA** to attenuate noise levels to the required level which shall be implemented within 7 days of the CPA issuing approval for the scheme, or the source of noise shall cease until such a scheme is in place.

Ecology & Biodiversity

Condition 30

Twelve months prior to the decommissioning and restoration of the application site, a detailed Landscape and Ecology Management **Plan (LEMP)** shall be submitted for the approval in writing of the County Planning Authority, which shall take into account the survey mentioned **undertaken in accordance with Condition 27** above and that in the survey season prior to restoration, the species surveys, i.e. badgers, reptiles and great crested newts are repeated to ensure the restoration takes account of the requirements of these species. In addition a programme for the implementation of the restoration, monitoring and aftercare provision for the enhancement of biodiversity (biodiversity net gain) focusing on native species and the results of the pre-commencement ecological surveys, whilst taking into account the use of the land for agricultural grassland and woodland. **The LEMP shall be implemented as approved.**

Reasons (amending reasons replacing the original)

Reason 2

To ensure that site operatives are conversant with the terms of the planning permission in the interests of the local environment and amenity to accord with Surrey Minerals Plan Core Strategy Development Plan Document 2011 Policy MC14.

Reason 6

To enable the County Planning Authority to exercise planning control over the operation so as to minimise the impact on local amenity to comply with Surrey Minerals Plan 2011 Policy MC14.

Reason 8

In order that the development should not prejudice highway safety nor cause inconvenience to other highway users, in accordance with Policies MC15 of the Surrey Minerals Plan Core Strategy 2011; and the Reigate and Banstead Core Strategy 2014 Policy CS17 and saved Policy Mo5 and Policy Mo6 of the Reigate and Banstead Local Plan 2005. *The imposition of a pre-commencement condition is recommended by the County Highways Authority to secure the submission of a revised and updated Transport and Traffic Management Plan to safeguard the environment and local amenity in terms of traffic and highways, in accordance with the development plan policies.*

Reason 11

To ensure minimum disturbance and avoid nuisance to the locality to comply with the Surrey Minerals Plan Core Strategy Development Plan Document 2011 Policy MC14. *The imposition of a pre-commencement condition is recommended by the County Noise Consultant to secure the submission of a Noise Monitoring Plan in order to provide appropriate noise control to ensure there would be no significant adverse impact from noise nuisance on nearby receptors, in accordance with the development plan policies.*

Reason 16

To ensure minimum disturbance and avoid nuisance to the locality to comply with the Surrey Minerals Plan Core Strategy Development Plan Document 2011 Policy MC14. *The imposition of a pre-commencement condition is recommended by Officers in order to secure a lighting scheme so that final detailed site lighting has been fully assessed to ensure that there would be no significant adverse impact from light pollution on nearby receptors from the development, in accordance with the development plan policies.*

Reason 17

To avoid endangering the safe movement of aircraft and operation at Gatwick Airport, and in the interest of residential amenity and the local environment and to comply with Surrey Minerals Plan Core Strategy Development Plan Document 2011 Policy MC14.

Reason 18

To avoid endangering the safe movement of aircraft and operation at Gatwick Airport, and in the interest of residential amenity and the local environment and to comply with Surrey Minerals Plan Core Strategy Development Plan Document 2011 Policy MC14.

Reason 19

To ensure that the works maintain the required level of environmental protection and land stability. *The imposition of a pre-commencement condition is recommended by the County Geotechnical Consultant to secure the submission of a Construction Environmental Management Plan to ensure there would be no significant adverse impact from pollution on groundwater, land and the environment, and for land stability in accordance with the Surrey Minerals Plan Core Strategy Development Plan Document 2011 Policies MC12 and MC14.*

Reason 20

To ensure that the works are constructed as designed and maintain the required level of environmental protection and land stability. To safeguard the environment and protect the

amenities of the locality in accordance with the terms of the Surrey Minerals Plan Core Strategy Development Plan Document 2011 Policies MC12 and MC14.

Reason 21

To safeguard the environment and protect the amenities of the locality in accordance with the terms of the Surrey Minerals Plan Core Strategy Development Plan Document 2011 Policies MC12 and MC14.

Reason 23

To safeguard the environment and protect the amenities of the locality in accordance with the terms of the Surrey Minerals Plan Core Strategy Development Plan Document 2011 Policies MC12 and MC14.

Reason 24

To ensure the design meets the national Non-Statutory Technical Standards for SuDS and the final drainage design does not increase flood risk on or off site, and to ensure protection of groundwater and surface water from activities at the site. *The imposition of a pre-commencement condition for a surface water drainage scheme is recommended by 1) the Environment Agency to ensure protection of groundwater and surface water from the activities at the site; and 2) the Lead Local Flood Authority to ensure that the development is compliant with SuDS as required the NPPF, its technical standards and governmental ministerial statement for SuDS, and in accordance with the Surrey Minerals Plan Core Strategy Development Plan Document 2011 Policy MC14.*

Reason 25

To ensure the design meets the national Non-Statutory Technical Standards for SuDS and the final drainage design does not increase flood risk on or off site, and to ensure protection of groundwater and surface water from activities at the site, in accordance with the Surrey Minerals Plan Core Strategy Development Plan Document 2011 Policy MC14.

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