

UPDATE SHEET**MINERALS/WASTE MO/2017/0916****DISTRICT(S) MOLE VALLEY DISTRICT COUNCIL****Brockham Well Site, Felton's Farm, Old School Lane, Brockham, RH3 7AU**

Installation of on-site facilities comprising hardstanding, site office, site toilet facilities, site security office and mess facility; storage containers; lighting units incorporating CCTV equipment; 2.4 metres high palisade fence and gates; electrical control buildings; portable site generator with 2 no. enclosed fuel tanks, and parking area for car/van until 31 December 2036 with restoration to agriculture (retrospective).

CONSULTATIONS AND PUBLICITY***Parish/Town Council and Amenity Groups***

1. Additional comments have been received on this application. The comments are summarised as the following:

Brockham Oil Watch

- The Officers' report does not mention the fact that there is a dispute on whether the planning permission is needed for drilling of the sidetrack BRX-4Z. Therefore, an addendum to the report is required covering the drilling of the sidetrack and the actions that the Officers propose to rectify this situation is requested.
- The applicant is planning to produce oil from the Kimmeridge layers and has submitted a planning application to the Oil and Gas Authority for the Field Development Plan Addendum to commence oil production for the Kimmeridge layers. As the Brockham X2, X2Z and X2Y are not deep enough to reach the Kimmeridge layers, the only possible way to produce oil from the Kimmeridge layers is from the sidetrack BRX-4Z and Brockham 1 – a water reinjection well (together with sidetrack BRX3). There is no planning permission for the production of oil from the sidetrack BRX-4Z.
- The infrastructure under the current application is considered to support oil production from the unauthorised sidetrack BRX-4Z.

Additional key issues raised by public

2. Two further letters of representation have been received on this application raising concerns. The comments are summarised as the following:

Rep 1:

- Object to this application which should be deferred until the current dispute over sidetrack BRX-4Z between the Surrey County Council and the applicant is resolved.
- The applicant has stated that the no planning application is required with regard to the sidetrack BRX-4Z in January 2017 and that there is no need to apply for a retrospective planning application for the drilling activities. The applicant misled the County Planning Authority during the period of drilling maintenance.
- The proposed development would support oil production from the disputed sidetrack.

- Concerns about the prospect of oil production from the Kimmeridge layers and the technology used which is considered to be risky and have potential harm to the environment and the human health.
- A planning application is needed for the sidetrack BRX-4Z.

Rep 2:

- The County Planning Authority should approve this retrospective application as being in the National interest.

Officers' Comments

3. The current Officers' Report deals with the above concerns.
4. Paragraph 28 of the Officers' Report clearly states that this retrospective application seeks to regularise the facilities for the purposes of administrative, parking and equipment storage use **ancillary to the existing permitted oil production activities**. Paragraphs 53 to 56 of the Officers' Report have factually covered the matter of the sidetrack which does not form part of this application.
5. In Paragraph 54, Officers state that planning permission is required for the onsite facilities as permitted development rights were withdrawn under the existing planning permission (ref. MO06/1294) which allows the applicant to produce oil by using permitted production wellheads BRX1 and BRX2 until 31 December 2036. Paragraph 55 explains the statutory requirements of the planning permission related to hydrocarbon extraction and oil & gas activities under the Planning Practice Guidance and the National Planning Policy Framework. Paragraph 56 clearly states that *"it is a fact that no planning permission has been granted by the County Planning Authority for the production of oil from the wellheads other than BRX1 and BRX2. In any event, there are no proposed or new oil production and drilling activities in this retrospective application."* Officers also recommend an informative to make the County Planning Authority's position clear with regard to the scope of the proposed development.