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Dear Sir/Madam,

Town and Country Planning Act 1990
Shale Gas Development and Nationally Significant Infrastructure

Thank you for providing the Mineral Planning Authority (MPA) with an opportunity to provide feedback in relation to the Government's proposal to include shale gas production projects in the Nationally Significant Infrastructure Project Regime.

Context

Although Surrey is one of the most densely populated and urbanised shire counties, it remains essentially rural in character with 73% and 26% of the county designated Metropolitan Green Belt and an Area of Outstanding Natural Beauty respectively. Surrey is also the most wooded county in England with 22% woodland cover, almost double the national average of 12%.

The minerals industry makes an essential contribution to Surrey's prosperity and quality of life and is vital to the development and refurbishment of its infrastructure. Consequently, the MPA actively supports the minerals industry by facilitating a steady supply of minerals that are vital to the functioning of the economy; safeguarding mineral resources from sterilisation by other forms of development; and enabling the identification and potential exploitation of mineral resources including construction aggregates, clay, silica sand, and oil and gas.

Since the 1950s, conventional oil and gas exploration and appraisal has occurred fairly widely across the southern part of Surrey. Limited quantities of hydrocarbons are currently produced by conventional means to the south of the North Downs. There are two operational sites producing oil: Felton's Farm, Brockham and Palmers Wood Oilfield, Godstone; and there is one site

currently with planning permission for appraisal activities at Horse Hill, near Horley. There is also one site currently with planning permission for production activities at Kings Farm, South Godstone; and the Albury wellsite has permission to produce compressed natural gas.

Presently, there is no fracking for shale gas taking place or proposed in Surrey. The British Geological Survey (BGS) estimates that there is no significant shale gas potential in the Weald Basin which includes the southern part of Surrey¹. Shale oil rather than gas is likely to be present. This means that the focus for exploration using fracking is likely to be the north of England for the foreseeable future.

The Consultation

Question 1

Do you agree with the proposal to include major shale gas production projects in the Nationally Significant Infrastructure Project regime?

No, the MPA does not agree that shale gas production projects should be included within the Nationally Significant Infrastructure Project (NSIP) regime as proposed.

The MPA considers that the novel, controversial and industrial nature together with the scale and likely significant environmental impacts of unconventional hydrocarbon development warrants continued and full-involvement of existing local democratic structures and the established planned system in determining whether such development should be granted express planning permission. This would allow for the continued proper management of major mineral development in Surrey by the MPA in accordance with the Development Plan (and any other material considerations) so as meet the needs and expectations of its communities.

Question 2

Please provide any relevant evidence to support your response to Question 1.

No evidence required as the answer given in response to Question 1 is a matter of fact.

Question 3

If you consider that major shale gas production projects should be brought into the Nationally Significant Infrastructure Project regime, which criteria should be used to indicate a nationally significant project with regards to shale gas production? Please select from the list below:

¹ The Jurassic shales of the Weald Basin: geology and shale oil and shale gas resource estimation, BGS, DECC 2014

- a. The number of individual wells per well-site (or 'pad')**
- b. The total number of well-sites within the development**
- c. The estimated volume of recoverable gas from the site(s)**
- d. The estimated production rate from the site(s), and how frequently (e.g. daily, monthly, annually or well lifetime)**
- e. Whether the well-site has/will require a connection to the local and/or national gas distribution grid**
- f. Requirement for associated equipment on-site, such as (but not limited to) water treatment facilities and micro-generation plants**
- g. Whether multiple well-sites will be linked via shared infrastructure, such as gas pipelines, water pipelines, transport links, communications, etc**

All of the above.

Question 4

Please provide any relevant evidence to support your response(s) to Question 3.

The MPA considers that a combination of factors and impacts would determine whether a scheme should fall to be determined under the NSIP regime or not. Existing conventional oil and gas production sites in Surrey are nowhere near the NSIP threshold. Similarly, any shale gas production scheme would need to be of a significant scale to fall into the NSIP category.

Question 5

At what stage should this change be introduced? (For example, as soon as possible, ahead of the first anticipated production site, or when a critical mass of shale gas exploration and appraisal sites has been reached).

When a critical mass of shale gas exploration and appraisal sites has been reached.

Question 6

Please provide any relevant evidence to support your response to Question 5.

Currently there are no sites producing shale gas in the United Kingdom. Exploration is very much in its infancy. The MPA therefore considers that the proposal to include shale gas production projects within the NSIP regime is premature.

I trust the above is helpful. Please contact me should you have any questions or concerns about the MPA's response.

Caroline J. Smith

Mrs. Caroline Smith
Planning Development Manager