

**To:** Planning & Regulatory Committee

**Date:** 14 September 2022

**By:** Planning Development Manager

**District(s)** Tandridge District Council

**Electoral Division(s):**

**Godstone**

**Chris Farr**

**Case Officer:**

**Samantha Murphy**

**Purpose:** For Decision

**Grid Ref:** 535050 148000

**Title:** Minerals/Waste TA/2021/1655

### Summary Report

**Land at Kings Farm, Tilburstow Hill Road, South Godstone, Surrey RH9 8LB**

**Installation of two steam methane reformation (SMR) units for the production of hydrogen from methane extracted from Bletchingley Wellsite and layout alterations including: a compressor package, surge tank, nitrogen supply tank, the laying of pipelines adjacent to the access track, two pre-reformer units, a Distribution Network Operator switch room, one 2MW generator, a tanker loading area for three transportation trailers, and a pressure reducing separation package on some 1.78 hectares and use of the access track for export of hydrogen for a temporary period with restoration to agriculture.**

Bletchingley Central and Bletchingley 2 (known collectively as land at Kings Farm) are existing wellsites located approximately 1.5km from South Godstone. Access is gained to these wellsites from Tilburstow Hill Road and an access track that leads first to Bletchingley 2 and then on to Bletchingley Central. Bletchingley 2 is located within the top half of a field approximately 80m west of Tilburstow Hill Road. Bletchingley Central is located a further 755m to the west and is surrounded to the east and south by Birchen Coppice, a potential Site of Nature Conservation importance and ancient woodland. The initial exploration stage carried out in the 1960s determined the presence of hydrocarbons in the Bletchingley gas field with the appraisal stage being granted planning permission in 2007.

Planning permission was granted in March 2016 (TA/2015/1572) for the production stage of onshore oil and gas development at Bletchingley Central and Bletchingley 2. This is the final stage in hydrocarbon development after exploration and appraisal. Planning permission ref:

TA/2015/1572 allowed for production of oil from Bletchingley Central to then be tankered off at a rate of 300 barrels of oil per day (40 tonnes); and for production of gas from both Bletchingley 2 and Bletchingley Central by converting some of the gas into electricity through a 1Mw generator and exporting that electricity to the network (known as Gas to Wire) and for some of the gas to be exported by pipeline along under the existing access track to a connection point beyond Tilburstow Hill Road (known as Gas to Grid).

The proposed development is to install two steam methane reformation units (SMR) to produce hydrogen at the application site and for its transportation off site. The SMR units would utilise methane that can be produced from the wellheads under planning permission ref: TA/2015/1572 alongside water in a chemical process that would produce hydrogen and carbon dioxide. The proposal includes the installation of two SMR units that would each produce 1000kg of hydrogen a day alongside two reformer

units, a hydrogen compressor package, a substation/ switchroom/ utility unit, a store/ office unit, a control room, a gas generator that would produce electricity for use at the site, and a cooler unit. The proposal also seeks to retain changes that were approved as part of a previous planning permission for ref: TA2019/1608 which: extended the containment area where oil processing activities take place, the planting of nine trees along the western boundary, the installation of three generating engines utilising gas from the wellsite to create electricity to taken off the site and modifications to the Bletchingley 2 wellsite.

It is appropriate to assess the proposal against European, National and Development Plan policy, and assess the potential environmental and amenity impacts against those policies and the advice provided by consultees and views expressed by other bodies, groups, and individuals. A key issue in determining this application is the need for the development. The Authority must also be satisfied that the potential impacts arising from the development are acceptable in terms of the closest residential properties and the local environment and amenities. The assessment in the report covers such environmental and amenity issues as noise, visual impact, ecology, highways and traffic, drainage, and air quality.

The proposal has generated 15 letters of objection with regards to noise, air quality impacts, climate change and traffic. Objections have also been received from local groups including: Keep Kirdford and Wisborough Green, Ace Tillingbourne Group, Weald Action Group, the Woodland Trust and Save Surrey Countryside on grounds of climate change and impact on the ancient woodland from nitrogen deposition. No technical objection has been received from consultees. The Greener Futures Team of Surrey County Council have said in their opinion without carbon capture, the proposal would generate greenhouse gas emissions that are significant and this is a material consideration, and that the application should be refused on this basis.

Officers consider that the production of hydrogen from SMR at the site is a separate industrial process to the production of hydrocarbons (mineral extraction) at the site, as such Officers consider the proposal is inappropriate development in the Green Belt. The National Planning Policy Framework places substantial weight to any harm to the Green Belt and that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. Officers are aware that the Government have published a number of strategies that set out aims and targets to meet both the sixth carbon budget as required by the Climate Change Act 2008 but also to increase national security with regards to energy supply. The production of low carbon hydrogen forms part of this energy mix and the Government seeks to increase the production of hydrogen in both the immediate and long term. The Government's Hydrogen Strategy recognises that hydrogen can be produced in a number of ways but is clear that hydrogen production should be low carbon, and whilst hydrogen could be produced from fossil fuels, it should be accompanied by carbon capture, utilisation and storage. This application seeks to produce hydrogen from methane, however with no carbon capture, utilisation and storage. The applicant states this is being pursued.

Officers have reviewed the proposal with regards to noise, air quality, ecology, surface water drainage, heritage, contamination, restoration; and highways and on this basis, and subject to conditions, are satisfied that the proposed development satisfies Development Plan policy in respect of these issues.

With regards to climate change, the applicant has said the proposal would provide benefits above the permitted scheme TA2019/1608 generating lower carbon dioxide emissions from the SMR units and that there would be further benefit from the use of the hydrogen in transportation substituting diesel. Officers consider that the downstream use of the hydrogen cannot be considered in this application as this is uncertain. Whilst the applicant has stated there would be fewer carbon dioxide emissions, the proposal would not be low carbon hydrogen production. The applicant does state that carbon capture,

utilisation and storage are being pursued however it is uncertain how this would be retrofitted and managed.

The proposal is for an industrial activity within the Green Belt and Officers consider that the factors advanced by the applicant are insufficient to clearly overcome the substantial weight given to the harm to the Green Belt. Consequently, the very special circumstances necessary to justify the use of the application site for hydrogen production do not exist and therefore the proposed development is contrary to Policy MC3 of the Surrey Minerals Plan 2011 and Policy DP10 of the Tandridge District Local Plan Detailed Policy Document 2014.

**The recommendation is to REFUSE planning application ref: TA/2021/1655**

---

## **Application details**

### **Applicant**

Island Gas Ltd

### **Date application valid**

9 September 2021

### **Period for Determination**

9 December 2021 (extension of time agreed until 30 September 2022).

### **Amending Documents**

Letter from the applicant dated 5 January 2022 and accompanying Air Quality Note dated November 2021, letter from Enzygo dated 9 December 2021 responding to Stantec, letter from Enzygo dated 9 December 2021 responding to the Lead Local Flood Authority and updated Flood Risk Assessment dated November 2021, Noise Assessment – Modular Hydrogen Plant dated December 2021; and Greenhouse Gas note response to consultees.

Email from the applicant dated 25 January 2022 and revised plans 0231-PL-001 rev 3 Bletchingley Proposed Planning Layout and 0231-PL-003- rev 3 Bletchingley Central Proposed Planning Elevations

Email from the applicant dated 28 February 2022 on elevations.

Email from the applicant dated 4 March 2022 from the applicant and attached letter from Enzygo dated 3 March 2022 Response to second tranche of RPS comments

Email from the applicant dated 17 March 2022 and attached letter from Enzygo dated 7 March 2022 Ecology Note

Email from the applicant dated 30 June 2022 responding to the Greener Futures Team

Email from the applicant dated 5 August 2022 with regards to ecology and air quality Construction Traffic Management Plan submitted 8 August 2022.

Email from the applicant dated 31 August 2022 with regards to water supply.

Email from the applicant dated 1 September 2022 and attached revised plan 0231-PL-003- rev 4 Bletchingley Central Proposed Planning Elevations and Ecology Addendum Note

---

## **Summary of Planning Issues**

This section identifies and summarises the main planning issues in the report. The full text should be considered before the meeting.



	<b>Is this aspect of the proposal in accordance with the development plan?</b>	<b>Paragraphs in the report where this has been discussed</b>
Need for the Development	No	67 – 92
Environmental Impact Assessment	Yes	99 – 101
Climate Change		102 – 121
Air Quality	Yes	122 – 142
Landscape and Visual Impact	Yes	143 – 160
Noise	Yes	161 – 180
Lighting	Yes	181 – 188
Surface Water Drainage	Yes	189 – 199
Contamination	Yes	200 – 207
Ecology and Biodiversity	Yes	208 – 213
Heritage Assets	Yes	214 – 231
Restoration	Yes	232 – 235
Highways, Access, Transportation	Yes	236 – 253
Green Belt	No	254 - 285

**Illustrative material**

Site Plan

Plan

Aerial Photographs

Aerial

Site Photographs

Photo 1 – Bletchingley 2 wellhead looking westwards

Photo 2 – View from Bletchingley Central away from site to access road (Birchen Coppice on the right hand side)

Photo 3 – Bletchingley Central looking south westwards (flare in the background)

Photo 4 – Bletchingley Central looking south westwards with oil storage tanks

Photo 5 – Bletchingley Central looking north eastwards at existing on site cabins

Photo 6 – Bletchingley Central wellhead

**Background**

**Site Description**

1. The application site at Kings Farm comprises two wellsite areas: Bletchingley 2 and Bletchingley Central and an access track approximately 5.5 metres (m) wide which connects the two wellsites to Tilburstow Hill Road. The application site will be discussed first as an overall site and then each wellsite separately. Bletchingley 2 wellsite is located approximately 80m west of Tilburstow Hill Road and Bletchingley Central approximately 885m west of Tilburstow Hill Road.

2. The application site is in a rural area within the Green Belt some 1.7 kilometres (km) to the west of South Godstone, 2.5km northwest of Blindley Heath and approximately 3.5km south of Godstone village. The Redhill to Tonbridge railway is approximately 580m north of the proposed site beyond Lambs Business Park. The land to the north falls within an Areas of Great Landscape Value (AGLV). There are two Sites of Archaeological Importance within the locality of the application site, one within the woodland known as Birchen Coppice and a second within Prickle Shaw. Prickle Shaw is also an Area of High Archaeological Potential. Both woodlands are ancient semi-natural woodland. There are three nearby rights of way these being Bridleway 293, footpath 269 and bridleway 539.
3. Access to both Kings Farm wellsites is gained via an existing access from the Tilburstow Hill Road. Tilburstow Hill Road joins the B2236 just south of Godstone village to the north and the A22 at a junction known as Anglefield Corner to the south.
4. The Bletchingley 2 wellsite is situated within the north/northwestern section of a field used for permanent cattle pasture. The wellsite consists of an area of hardstanding surrounded by post and wire fencing and hedgerow planting. The wellhead is surrounded by Heras fencing. The field itself is bounded by hedgerows and oak trees. Farmland adjoins the field to the west and south. The eastern extent of the field forms a boundary with Tilburstow Hill Road and the northern extent with the access track. The nearest residential properties to Bletchingley 2 are at Kings Farm with Le Grand Chene apartments, a residential property known, as Lakeside; and Orchard Cottage and Yew Tree Cottage.
5. The Bletchingley Central wellsite is situated approximately 760m west of Bletchingley 2 and is surrounded to the south and east by Birchen Coppice with agricultural fields beyond. There is a hedge and treeline to the west of the wellsite boundary and agricultural fields to the north. Bletchingley Central is surrounded by a 2.5m high green security fence. The wellsite currently comprises of the wellhead, a bunded area containing oil storage tanks, separators, a heater and triplex; a generator and compressor unit; a water tank; a bund; and offices. The nearest group of residential properties are located to the south of the site some 650m distant.

## Planning History

6. Planning permission was obtained for the temporary installation of drilling equipment at Lagham Park Farm under consent Ref GO/R 7151 in September 1956, Kennels Farm, Bletchingley (Ref: GO/R 7441), King Farm (Ref GO/R7442 April 1966) and at Lambs Brickworks (Ref: GO/R/7666). Three of the boreholes were successful and one was 'dry'. Natural gas was found at a depth of 1066 metres and permission was given for the installation of equipment to exploit gas at Lagham Park Farm (Ref GO/R 7510) and Kings Farm (Ref: GO/R 7442A). Following this, Bletchingley 2 and Bletchingley Central wellsites were subject to temporary planning permissions for exploration and appraisal works in the 1980's and then more recently in the 2000's.
7. The most recent planning permissions for Kings Farm Wellsite are TA/2015/1572 (granted in March 2016) and TA2019/1608 (granted in February 2020). TA/2015/1572 was for the retention and extension of the two appraisal wellsites (Bletchingley Central and Bletchingley 2) and access track for the production of conventional hydrocarbons for a period of 15 years. This included temporary flaring to re-establish gas flow at Bletchingley 2, the laying of pipelines adjacent to the access track; the installation of hydrocarbon production plant and equipment including new oil and water storage tanks; equipment for gas to wire and grid schemes; a tanker holding area and perimeter fencing with restoration to agriculture. This planning permission was subject to

the imposition of 46 conditions, 8 of which required further details to be submitted to the County Planning Authority which were duly submitted. The planning permission was implemented in February 2019, as such, the development shall cease and the site is to be restored by February 2034.

8. Following this planning permission (ref: TA2019/1608) was granted in February 2020 to retain the wellsites as permitted in TA/2015/1572 but to increase the on-site electricity production by installing three 2MW onsite generators and removing the export of gas by pipeline. This planning application also proposed other small changes including a reduction in the size of the bund at Bletchingley Central and a reduction in the size of Bletchingley 2 wellsite area.

---

## **The proposal**

9. The proposal involves the installation of two steam methane reformation (SMR) units for the production of hydrogen from methane extracted from Bletchingley Wellsite and associated site layout alterations including: a compressor package, surge tank, nitrogen supply tank, the laying of pipelines adjacent to the access track, two pre-reformer units, a Distribution Network Operator switch room, one 2MW generator, a tanker loading area for three transportation trailers, and a pressure reducing separation package on some 1.78 hectares and use of the access track for export of hydrogen for a temporary period with restoration to agriculture.

### Bletchingley 2

10. Gas produced would be transported to Bletchingley Central via a pipeline for use in the steam methane reformation (SMR) process and also to produce electricity for use on site. Any electricity generated over and above the site's needs would be transported by wire to the local electricity connection which is just off the access track.

### Bletchingley Central

11. The applicant proposes to extend the containment area of Bletchingley Central in a north/north easterly manner. The extended operational area would be underlain by a suitable membrane and an operational surface of up to 300mm of suitable aggregate to tie in within existing levels at the well compound. Drainage ditches are proposed around the 'containment area' which is where the oil processing activities take place to ensure that all fluids are retained. The applicant proposes to plant nine new trees along the south western boundary.
12. The production of oil from this wellsite area will continue in accordance with the existing planning permission. Should the application be granted, gas brought to Bletchingley Central would be fed into the gas generator for producing on site electricity and also the two SMR units to produce hydrogen. After the hydrogen is produced following a chemical reaction within the SMR, the hydrogen would pass into a compressor where it is compressed before being discharged directly into the transportation unit. The transportation unit is mounted on a transportation trailer and would comprise built in hydrogen storage cylinders fabricated from either steel or reinforced glass fibre or similar materials. The trailer would remain on site in a dedicated loading area until full, at which point it would then be transported via the road network to the relevant market. The transportation unit has a flexible connection point which would remain connected to the hydrogen generator via a loading station until the storage cylinders are full. Three loading areas are proposed to allow for change over between trailers. The two SMR units would each have a capacity to produce up to 1,000kg of hydrogen per day so a total of 2,000kg. The

development design is modular such that most of the plant and equipment would be pre-fabricated off site.

13. The applicant states suggested trailer capacities for the hydrogen export would be in the region of 500kg and 850kg per delivery and as a worst case, if a small capacity trailer is used, this would result in approximately eight movements per day. There would also be four movements per week for water disposal via light good vehicle. The proposal would occur 24 hours a day, 7 days a week, HGV movements would take place every day although movements on Sundays and Bank Holidays would be limited.

14. The plant and equipment for Bletchingley Central would be:

Hydrogen production	Oil equipment	Other elements
<ul style="list-style-type: none"> <li>Two SMR units (3m x 16.5m)</li> <li>Two SMR package (7.8m x 3.2m)</li> </ul>	<ul style="list-style-type: none"> <li>3 stabilisation tanks (tanks are in situ)</li> <li>Heater (7m x 2.4m) (in situ)</li> </ul>	<ul style="list-style-type: none"> <li>A gas flare (only used in exceptional circumstances such as emergencies) (10m in height and already in situ)</li> <li>Transformer (4m x 4m)</li> </ul>
<ul style="list-style-type: none"> <li>Two pre-reformer (6m x 2.2m)</li> <li>Hydrogen compressor (2.2m x 5.8m)</li> </ul>	<ul style="list-style-type: none"> <li>Two separators (in situ)</li> <li>A power fluid vessel (PFV) (5m x 2m) (in situ)</li> <li>Triplex (5m x 2m) (in situ)</li> </ul>	<ul style="list-style-type: none"> <li>Control room/ store (6m x 2.4m)</li> <li>Cooler unit (2.4m x 2.8m)</li> </ul>
<ul style="list-style-type: none"> <li>Three tanker loading bays</li> </ul>	<ul style="list-style-type: none"> <li>Two knock out pots (1m x 1m)</li> <li>A utilities unit (12m x 2m)</li> <li>Gas treatment (6.5m x 2.5m)</li> <li>Pig receiver (4m x 2.2m)</li> </ul>	<ul style="list-style-type: none"> <li>Gas generator (13m x 3.2m)</li> <li>DNO switch room (3.6m x 3.2m)</li> <li>Stores/ office (12m x 2.4m)</li> <li>Substation/ switchroom/ utilities (12m x 2.4m)</li> <li>Fire water tank (11m in diameter)</li> </ul>

15. The fully containerised SMR hydrogen unit would measure 16.5m (length) x 3m (width) with part of the unit being 3.7m in height and part 7.6m in height. There would be an exhaust flue on top of the taller section which would rise to a total height of 10.9m in height. As part of the SMR unit package, the SMR unit would be flanked by a compressor unit, surge tank, nitrogen supply tank and an electrical module running alongside. The transportation unit would measure 12.2m (length) x 2.4m (width) x 2.6m (height). It will sit on a standard wheeled trailer unit and be parked on an impermeable concrete pad whilst loading. Following the receipt of comments from consultees in the autumn of 2021, the exhaust flue design was changed, and the applicant carried out detailed modelling of this amendment. This proposal does not include a form of carbon capture use and storage and the applicant states they are 'actively pursuing this matter'. The proposal would take water from the existing water supply to the site and the applicant has stated this is capable of providing the volume of water for the process which would amount to 6.4 tonnes of water per day. The applicant has said no permit for mains water usage is required. Once the water is used within the SMR as steam, it would become processed water and then be tankered off the site alongside the other process water and this is included in the highway figures.

16. The applicant proposes to lay three pipelines (a signal/ data cable, a gas flowline and a condensate flowline) in a trench immediately adjacent to the access track sunk a minimum of 800mm below the surface. The pipeline would be 1.12km in length. The pipeline would be covered with backfill with soft sand being placed around the pipes. The pipeline would be 'moled' beneath hedgerows to ensure it does not impact upon them. On cessation of operations, the pipelines and casings would be removed.

#### Lighting

17. The applicant proposes to install lighting at both wellsites. For Bletchingley 2, the applicant proposes two strip lights on the well and one security light on the control room. For Bletchingley Central the applicant proposes 22 weatherproof fluorescent lights on the flare, the wells, around the oil tanks and oil process area and along the northern boundary in front of the bund facing towards the SMR units and loading area; and 10 PIR security floodlights on the store/office, switchroom, SMR units and facing towards the HGV loading bays.

#### Restoration

18. All plant and infrastructure would be decommissioned and removed from the site in accordance with TA/2015/1572 and the site would be restored in accordance with previously approved schemes, back to agriculture with a five year aftercare period. The well abandonment would be carried out in line with best practice with the well cellars and any other impermeable areas emptied of fluids and any potentially contaminated material removed and disposed of at an appropriate licensed facility. The well head and surface valve arrangements would then be removed, and the well casing cut off not less than 1.8m below the finished ground level, a metal plate welded on top and a concrete cap placed on top of the plate. With regard to above ground, valves and pipes would be cleaned and removed from site. Any potentially hazardous materials would be disposed of appropriately. The concrete would be broken up and removed. The underlying impermeable membranes would be removed and disposed of to an appropriate licensed facility. Any underlying compaction formed in the subsoils would be ripped and the site restored in accordance with the approved restoration.

---

### **Consultations and publicity**

#### **District Council**

19. Tandridge District Council Planning : No objection
20. District Environmental Health Officer : No response received.

#### **Consultees (Statutory and Non-Statutory)**

21. County Landscape Architect : whilst the proposed development includes taller infrastructure than the permitted scheme, the effects of this are limited given the level of screening and the overall industrial character of the compound would not be significant different to that permitted. As there is an increase in HGV movements for this proposal this could have an overall slight adverse effect on views and landscape character. The proposed changes to Bletchingley 2 would be minimal from a landscape and visual perspective.
22. County Air Quality Consultant : Requested further clarification with regards to nitrogen emissions. Concurs with the findings with regards to vehicle emissions and dust emissions.



23. Surrey Fire & Rescue : the application has been examined by a Fire Safety Inspecting Officer and it appears to demonstrate compliance with the Fire Safety Order in respect of means of warning and escape in case of fire. Responsibility for ensuring that a building is provided with appropriate fire safety arrangements rests with the responsible person. Fire safety information in accordance with Regulation 38 of the Building Regulations 2010 should be provided to the responsible person at the completion of the project.
24. Public Health England - Surrey & Sussex HPT: No comments received
25. Gatwick Airport Safeguarding : No objection subject to an informative with regards to use of cranes.
26. Rights of Way : No comments received
27. Health and Safety Executive : the proposed site and storage of hydrogen will require Hazardous Substances Consent as the volume to be stored on site is likely to exceed the threshold of 2 tonnes (Officer comment – as this is a separate regime to the planning regime, this can be requested as an Informative. A Hazardous Substances Consent would be issued by the Hazardous Substances Authority which in this case, is Surrey County Council, in consultation with the Control of Major Accident Hazards (COMAH) authorities which are the HSE and the Environment Agency).
28. Lead Local Flood Authority : 2021 – not satisfied that the proposed drainage scheme meets the requirements set out in the NPPF, NPPG and the Non-Statutory Technical Standards for sustainable drainage systems. Requested further information which has been provided. Satisfied can be dealt with by condition.
29. Department of Business, Energy and Industrial Strategy (BEIS): No comments received
30. Greener Futures Team : Request further details on the workings for the calculations used in the Greenhouse Gas Assessment, whilst recognising that hydrogen may form an important element of decarbonising energy and transport systems in the future, key concern is that hydrogen produced from a fossil fuel source without carbon capture and storage cannot count as a low carbon fuel. What is the extent to which vented methane and methane leakage is avoided. Disagree with key summary.
31. SCC Emergency Planning : For emergency planning issues, the response by the Fire Service is relevant if the quantities on site are not above the threshold for either upper or lower tier COMAH site. If the site becomes a COMAH site it will either be an Upper Tier or Lower Tier site and there will be different requirements for these. All operators of an Upper Tier site would be required to produce a safety report.
32. County Highway Authority : No objection on capacity, safety or highway grounds subject to the imposition of conditions.
33. Public Health Surrey County Council : No comments received
34. Southern Water : No objection
35. County Ecologist : Request further information as to whether there could be a potential impact on ancient woodland due to air quality from the proposal and whether the woodland is acidophilous Quercus woodland or Meso and eutrophic Quercus woodland as the critical loads for nitrogen are different. This information has been received and satisfied with the information provided.
36. Biggin Hill Airport Ltd : No comments received

37. County Geological Consultant : the Flood Risk Assessment is satisfactory. Requested further information with regards to containment measures and the impermeable membrane. Conditions with regards to drainage should be imposed for further details and a verification report to be submitted prior to operation of the development. No information has been provided on soils. Recommend conditions on soils are imposed. Recommend conditions are imposed for the management of operational and legacy soil contamination are imposed.
38. County Archaeologist : The wellsites, Bletchingley Central and Bletchingley 2, have previously been the subject of an archaeological evaluation in respect of Planning Condition 7 (Archaeology) attached to approval TA/2015/1572. The evaluation was negative at both wellsites. Given this, and that the proposed alterations to the wellsites are largely, if not wholly, contained within the existing track and previously evaluated development areas, no archaeological concerns.
39. Environment Agency : No objection. Some of the proposed changes will overlap with changes being reviewed by the Environment Agency for the Environmental Permit.
40. Sutton and East Surrey Water : Water mains are located along Tilburstow Hill Road. Safe digging practices should be used to verify and establish the actual position of the mains, pipes, services and other apparatus on site.
41. Fisher German LLP : No comments received
42. British Pipelines Agency : BPA pipeline(s) is not affected by these proposals, and therefore BPA does not wish to make any comments on this application.
43. County Historic/Listed Buildings Officer : Satisfied the proposal would not have an impact on the setting of listed buildings.
44. County Noise Consultant : Requested further information on the baseline levels being representative and that the assessment considered the cumulative effects of the existing site activities operating at the same time. That conditions that were imposed on the previous planning consents are brought forward.
45. UK Power Networks : No comments to make other than should the excavation affect an Extra High Voltage equipment (6.6KV, 22 KV, 33 KV or 132 KV), to contact UKPN.
46. Southern Gas Networks (SGN) : No objection. There is a 180 pe medium pressure gas main in Tilburstow Hill Road and any excavation should be done in accordance with HSG47.

#### Parish/Town Council and Amenity Groups

47. Godstone Parish Council : No objection
48. Bletchingley Parish Council : No objection. Response dated 9 August says no objection on the proviso that there is a commitment to retrofit carbon capture.
49. British Horse Society : No objection providing the construction lorries give way to equestrians they may meet on the surrounding roads, particularly Tilburstow Hill Road which leads to a number of bridleways.
50. Godstone Village Association : No comments received

51. Save Surrey Countryside : Objection as SMR process produces large CO<sub>2</sub> emissions and methane and nitrous oxide emissions. The proposal would contribute to the adverse effect on the nature in the local area and there would be marked adverse local effects on nature from these emissions. 1kg of hydrogen produces 9.3kg of CO<sub>2</sub> so 730 tonnes per year (tpa) of hydrogen would produce 6,789 tpa of CO<sub>2</sub>. This is not acceptable when we must reduce our CO<sub>2</sub> emissions as quickly as possible. There does not appear to be any gas production at the site that the hydrogen production would replace. This should be taken into account. A new planning application for hydrocarbons should be refused. Carbon capture and storage should be proposed and the indeterminate situation with this is uncertain. There will be a significantly adverse impact on the effect on nature in the local area from pollutants. These probably cannot be monitored or enforced. iGas has plans to produce more hydrogen from this site. there would be additional pollutants from the HGVs transporting the hydrogen off site. measures must be taken to prevent a major accident and limit consequences for human health and the environment. Safety plant, emergency plans and a Major Accident Prevention Policy are needed. There will be noise and light pollution. The site is next to Birchen Coppice and Prickle Wood is next to the access road. The industrial process will emit dangerous greenhouse gases and other air pollutants. Hydrogen production should be from renewable energy.
52. The Woodland Trust : Objection due to detrimental impact to Birchen Coppice. Nitrogen pollution is one of the most significant and immediate threats to ancient woodland and leads to direct loss of species. The Air Quality note shows that for the area of Ancient Woodland, the process contribution exceeds 1%. The current background level of nitrogen deposition in Birchen Wood is 27.86 Kg N/ha/year. The critical loads for habitats have been set at figures where evidence indicates that above these values, adverse impacts are expected to occur. Further significant increases in the levels of nitrogen will lead to continued deterioration of ancient woodland habitat, and its ecological integrity. The application must be able to demonstrate that any resulting increase in the levels of ammonia and nitrogen deposition will be insignificant (<1% of the critical level and load) at all ancient woodland sites.
53. Ace Tillingbourne Group : Object to the proposal. Appreciate hydrogen production is essential for future energy requirements to combat climate change but this proposal would not use renewable energy to produce hydrogen. The proposal will emit considerable amounts of carbon dioxide from fossil fuels. It is unlikely Carbon Capture Use and Storage could be installed quickly as a second stage if permission was granted. Based on production of 2 tonnes of hydrogen a day, as set out in the planning statement, and a factor of 1kg of hydrogen to 9.3 tonnes of carbon dioxide, the proposal would emit 6789 tonnes of carbon dioxide a year. The emissions from the lorry movements will cause damage to the local environment and human health further afield. Birchen Coppice is ancient woodland and a potential SNCI. There will be noise and disturbance. There will be lighting for 24 hours a day. Production, storage and transport of hydrogen is hazardous. This is grey hydrogen and is not supporting by the Government's new Energy Strategy.
54. Keep Kirdford and Wisborough Green KKWG : Objects to the proposal on climate change, release of green house gas emissions, need to meet the Paris Agreement. The application has a number of misleading statements as the proposal is to produce high carbon 'grey' hydrogen and is not low carbon hydrogen as promoted in the Government's 10 Point Plan, Energy White Paper, Hydrogen Strategy or the Decarbonising Transport Strategy. The proposal would emit more than additional 18,600kg of carbon dioxide (CO<sub>2</sub>) equivalent into the air every day. This is more than 18 tonnes each day and 7,384 tonnes annually. The UK national policy states we need to cut emissions by 78% by 2035. This proposal would hinder that. The option for carbon capture and storage at the site is unlikely and does not form part of this application. We should be looking to produce 'green' hydrogen from wind power. Hydrogen has the potential to service





















































































































