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Mr [REDACTED]

Zetland Group

By email

Our ref: MIN/RE/18 / SCC_Ref_2018/0152 / RE18/02667/CON
Your ref:

18 December 2024

Dear [REDACTED]

TOWN AND COUNTRY PLANNING ACT 1990

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2017 (AS AMENDED)**

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

PROPOSAL: Retention and extension of an existing well site, HH1 and HH2 wells, and vehicular access to allow: 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

APPLICANT: Horse Hill Developments Limited

GRID REF: 525342 143607

Introduction

1. I am writing in connection with the above application for development.
2. Part A of this letter requests the submission of further information under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the EIA Regulations). The requested information is required to complete the previously submitted Environmental Statement (ES) and to enable assessment of the likely significant environmental effects of the development as required by the EIA Regulations.
3. Part B of this letter sets out the information required to update the Planning Statement and the accompanying non-EIA technical assessments submitted in support of the application. This advice accounts for changes in national and local planning policy, and the most recent guidance set out in the County Council's local validation checklist for minerals development.

Part A The Environmental Statement

4. The previously submitted ES included technical chapters covering the following matters. Further or clarifying information was provided for several topics in response to comments received from technical and statutory consultees.
- Chapter 6 (pp.33-40) – Greenhouse gas (GHG) emissions and the climate, with supporting information set out in Appendix C (Air Quality Assessment, dated 8 November 2018, prepared by Socotec UK Limited, section 4.9, pp.58-59) to the Planning Statement.
 - Chapter 7 (pp.41-59) – Noise, with supporting information set out in Appendices 3.1 to 3.6 (prepared by Spectrum Acoustic Consultants, dating from 2017 and 2018) to the ES. Additional information was provided on 11 July 2019 in letter form in response to queries posed by the County noise consultant (CNC).
 - Chapter 8 (pp.60-78) – Ground and Groundwater Protection, with supporting information set out in Appendix 4 (Hydrogeological and Flood Risk Assessment, prepared by Envireau Water and dated November 2018) to the ES. Additional information was provided on 3 May 2019 and 3 July 2019 in letter form in response to queries posed by the Environment Agency (EA) and the County geotechnical consultant (CGC).
 - Chapter 9 (pp.79-88) – Traffic. Supporting information was provided in the Transport Statement submitted as Appendix G to the Planning Statement. Additional information was provided on 16 May 2019 in letter form in response to queries posed by the County Highway Authority (CHA).
 - Chapter 10 (pp.89-111) – Lighting, with supporting information set out in Appendix 5 (prepared by Strenger Ltd) to the ES.

ES Chapter 6 – GHG Emissions and Climate Change Effects

5. Chapter 6 of the revised ES must include an estimate of the GHG emissions likely to arise from the combustion of fossil fuel products derived from the extracted crude oil and from the combustion of all natural gas produced from the well site. The previously submitted ES estimated the GHG emissions likely to arise from the well site's construction, operation, decommissioning and restoration, that estimate must be updated and factored into the new assessment of the development.
6. To inform the assessment the maximum amount of crude oil and associated natural gas that could be extracted over the operational life of the well site will need to be estimated. That estimate will form the basis of a worst case scenario assessment of the GHG emissions linked to the project. A range of production profiles must be considered, to cover the possibility of peak production occurring at different points in the well site's operational life. It must be assumed that all extracted crude oil will be converted to fossil fuels and combusted.
7. The assessment must include all crude oil and associated natural gas produced at the well site to date. Based on data for Horse Hill sourced from the North Sea Transition Authority's [Petroleum Production Reporting System](#) it is our understanding that between March 2020 and September 2024 a total of 15,830.4 tonnes of crude oil and of 471.7 tonnes of natural gas had been extracted (see Table 1 below).

Table 1: Reported crude oil and natural gas production at Horse Hill Well Site – March 2020 to September 2024

Year	Oil Production Mass (tonnes)	Associated Gas Production Mass (tonnes)
2020	5477.0	167.3
2021	4112.4	96.1
2022	2494.0	77.2
2023	2499.1	81.7
2024	1247.9	49.3
Total	15,830.4	471.7

8. The likely significance of the GHG emissions associated with the production and use of fossil fuels derived from the extracted crude oil and from the combustion of the associated natural gas must be assessed in line with the advice set out in the Institute of Environmental Management and Assessment (IEMA) guidance 'Assessing Greenhouse Gas Emissions and Assessing their Significance' (2nd edition, February 2022). The assessment must consider relevant carbon budgets for all periods during which the well site would be operational.
9. For clarity, supporting information relied on in the GHG assessment element of the EIA should be provided as a topic specific Appendix to the submitted ES, and clearly labelled as such.
10. Any mitigation measures required or proposed to off-set on-site and downstream GHG emissions associated with the development must be set out within Chapter 6 of the updated ES.
11. The further information detailed above is requested under Regulation 25 of the EIA Regulations.

Chapter 7 – Noise

12. Chapter 7 of the revised ES must include an updated account of baseline noise conditions for the application site, surrounding area, and nearby noise sensitive receptors. The policy and guidance context for the assessment must be reviewed and updated, taking account of all relevant standards (e.g., British Standard 4142: 2014 for ancillary plant and operations associated with production) and good practice advice (e.g., paragraphs 3.15 to 3.27, pp.7-10 in the SCC Guidelines for Noise and Vibration Assessment and Control, January 2020, the IEMA guide to 'Determining Significance for Human Health in Environmental Impact Assessment' (November 2022)). The updated assessment should also reflect and respond to comments provided by the County noise consultant on the previous assessment.
13. The noise sensitive receptors previously identified must be reviewed and any new receptors factored into the assessment. The relationship between noise monitoring locations and noise sensitive receptors must be explained in the ES, using maps and tables as appropriate.
14. The noise mitigation and monitoring measures previously identified and agreed to under the quashed permission must be reviewed and updated as required. A

schedule of proposed noise mitigation and monitoring measures must be set out within Chapter 7 of the updated ES.

15. The further information detailed above is requested under Regulation 25 of the EIA Regulations.

Chapter 8 – Ground and Groundwater Protection

16. Chapter 8 of the ES must include an updated account of baseline conditions for both surface waterbodies and ground water resources at and underlying the application site. The environmental setting information (e.g. public and private water supply abstraction licences and boreholes, etc.) presented in section 8 (pp.26-28) of the 2018 Hydrogeological and Flood Risk Assessment must be reviewed and updated. The policy and guidance context for the assessment must be reviewed and updated, taking account of all relevant standards and good practice advice. The updated assessment should also reflect and respond to comments provided by the Environment Agency and the County geotechnical consultant on the previous assessment.
17. For clarity, supporting information relied on in the water quality assessment element of the EIA should be provided as an Appendix to the submitted ES and clearly labelled as such.
18. For clarity the chapter title should reflect the matters covered in the assessment, as set out in paragraph 279 (p.60) of the original ES – that is water resources and flood risk.
19. The water quality mitigation and monitoring measures previously identified and agreed to under the quashed permission must be reviewed and updated as required. A schedule of proposed water quality mitigation and monitoring measures must be set out within Chapter 8 of the updated ES.
20. The further information detailed above is requested under Regulation 25 of the EIA Regulations.

Chapter 9 – Traffic

21. Chapter 9 of the ES must be updated in line with the advice set out in the IEMA guidelines for the 'Environmental Assessment of Traffic and Movement' (July 2023) and the IEMA guide to 'Determining Significance for Human Health in Environmental Impact Assessment' (November 2022).
22. Chapter 9 of the revised ES must include an updated account of baseline traffic and highways conditions for the application site and surrounding highways network and communities. The policy and guidance context for the assessment must be reviewed and updated, taking account of all relevant standards and good practice advice. The updated assessment should also reflect and respond to comments provided by the County Highway Authority on the previous assessment.
23. The mitigation and monitoring measures previously identified and agreed to under the quashed permission to address the traffic related effects of the development must be reviewed and updated as required. A schedule of proposed traffic and movement mitigation and monitoring measures must be set out within Chapter 9 of the updated ES.

24. The further information detailed above is requested under Regulation 25 of the EIA Regulations.

Chapter 10 - Lighting

25. Chapter 10 of the revised ES must include an updated account of baseline light intrusion conditions for the application site, surrounding area, and nearby sensitive receptors. The policy and guidance context for the assessment must be reviewed and updated, accounting for any changes in required standards and good practice advice (e.g. the IEMA guide to 'Determining Significance for Human Health in Environmental Impact Assessment' (November 2022), the Chartered Institute of Ecology and Environmental Management (CIEEM) promoted 'Guidance Note 08/23: Bats and artificial lighting in the UK', prepared by the Institute of Lighting Professionals and the Bat Conservation Trust, dated 2023).
26. Light sensitive receptors previously identified must be reviewed and any new receptors introduced into the area subsequent to the last assessment must be factored into the revised assessment. Account must be taken of both human and ecological receptors.
27. The mitigation and monitoring measures previously identified and agreed to under the quashed permission to address the lighting effects of the development must be reviewed and updated as required. A schedule of proposed lighting mitigation and monitoring measures must be set out within Chapter 10 of the updated ES.
28. The further information detailed above is requested under Regulation 25 of the EIA Regulations.

Part B Planning Statement and supporting non-EIA technical assessments

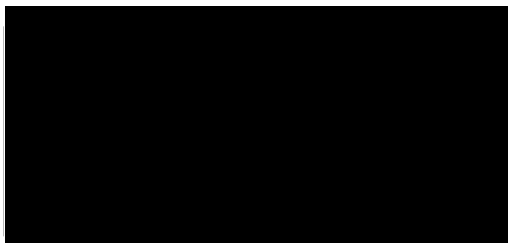
29. The previously submitted Planning Statement was supported by non-EIA technical assessments covering the following matters:
- Air Quality Assessment – prepared by Socotec UK Limited, dated 8 November 2018 and provided as Appendix C to the Planning Statement. Section 4.9 (p.58-59) of the Air Quality Assessment provided information about GHG emissions and therefore formed part of the supporting information for the EIA and ES.
 - Landscape and Visual Appraisal – prepared by the Environmental Dimension Partnership Ltd, dated November 2018 and provided as Appendix D to the Planning Statement.
 - Ecological Impact Assessment – prepared by AECOM Infrastructure and Environment UK Limited, dated 23 November 2018 and provided as Appendix E to the Planning Statement.
 - Arboricultural Assessment – prepared by the Environmental Dimension Partnership Ltd, dated November 2018 and provided as Appendix F to the Planning Statement.
 - Transport Statement – prepared by Zetland Group Limited, dated 30 November 2018 and provided as Appendix G to the Planning Statement.

- Major Accidents and Disaster Risk Assessment – prepared by Zetland Group Limited, dated 30 November 2018 and provided as Appendix H to the Planning Statement.
 - Ground Investigation Report – prepared by Mott MacDonald, dated 1 November 2018 and provided as Appendix I to the Planning Statement.
 - Waste Management Assessment – prepared by Zetland Group Limited, dated 30 November 2018 and provided as Appendix J to the Planning Statement.
30. The above listed technical assessments must be reviewed and updated in light of the guidance set out in the most recent version (dated January 2024) of the CPA's local validation list for minerals development. Where relevant Government and/or professional institute guidance has changed in the period since the application was submitted the non-EIA technical assessments must be updated to take account of the current guidance.
31. The Air Quality Assessment must be updated to take account of changes in national targets for key pollutants, including the new target for fine particulate matter (PM_{2.5}) introduced in October 2023.

Closing Comments

32. This letter sets out the information required for this application to progress. Please note, the CPA may request additional information/clarification following consultation on the information submitted in response to this letter.
33. The information set out in Part A of this letter is formally requested under Regulation 25 of the EIA Regulations. That information is required to complete the ES and bring it to a standard compliant with the requirements of Regulation 18 of the EIA Regulations.
34. Please note that determination of the application will not proceed until the required further information has been submitted and all subsequent public consultation completed in accordance with the requirements of the EIA Regulations.
35. If you have any questions about the requirements set out in this letter, please do not hesitate to contact us for further advice.

Yours sincerely



Sian Saadeh
Planning Development Management