

Town & Country Planning (EIA) Regulations 2017  
**Secretary of State Screening Direction – Written Statement**

Application name:	Retention of an existing well site for 10 years for oil production from the existing boreholes, drilling of a sidetrack well and two boreholes for the production of oil (Variation of condition 2 (Temporary time limit) and 3 (Restoration) of 6/2013/0001 in order to retain the wellsite for a further ten years)  at Waddock Cross Wellsite, Waddock Cross Affpuddle Dorchester DT2 8QY  (Application no.: P/VOC/2023/02762)
SoS case reference:	PCU/EIASCR/D1265/3376636
Schedule and category of development:	Schedule 2  2(d) Deep drillings  2(e) Surface industrial installation for the extraction of petroleum

**Full statement of reasons as required by 5(5)(a) of the 2017 EIA Regulations including conclusions on likelihood of significant environmental effects.**

The Secretary of State ("SoS") has considered whether the above proposal is likely to have significant environmental effects. He has undertaken this screening, taking into account the criteria set out in Schedule 3 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and having also had regard to Planning Practice Guidance ("PPG"). This indicates that the main matters for this type of development are likely to be the wider impacts on surrounding hydrology and ecology, scale of development, emissions to air, discharges to water, the risk of accident and the arrangements for transporting the fuel.

Furthermore, he has screened having regard to use of natural resources and transboundary climate impact due to greenhouse gas emissions.

*Schedule 3 selection criteria for Schedule 2 development refers:*

*1 (a) – (g) regarding characteristics of development*

The proposed development involves extraction of crude oil and combustion. It will produce 1.047 million barrels of oil over an eight-year timeframe between 2026 and 2033, which equates to 17,272.5 tonnes of crude oil per year.

The application site of 2.09 hectares ("ha") comprises of:

- An existing wellsite (0.979 ha), including wells 2 and 3, storage tank, secondary bunding, water tank, tanker loading area and associated facilities;
- An extension area to the west of the existing wellsite (0.627 ha), including drilling of wells 4 to 6; and
- An associated access track (0.484 ha) of approximately 200m in length runs between the highway to the south of the site and the existing oilfield site.

The site will be developed in five phases comprising the development of existing site to restart production; the drilling of a sidetrack well (well 4); the extension of wellsite; the drilling of two additional wells (wells 5 & 6) for appraisal and production of oil; and the subsequent restoration of the

site. The applicant states that wellbores and the site will be restored in accordance with industry best practice and the requirements of the Mineral Planning Authority.

A planning permission (6/2013/0001) was granted in 2013 for the application site for retention of the existing well site for oil production. This permission requires operation to cease by 1<sup>st</sup> June 2023.

The applicant submitted a planning application in 2023 under section 73A of the Town and Country Planning Act to vary conditions 2 and 3 of the existing planning permission to retain the wellsite for a further 10 years until 2033. The submitted planning statement states that the sidetrack well and two new boreholes have yet to be drilled and the extension to the wellsite has not been constructed, well 3 is currently shut-in due to high water-cut when it was last on production in 2014.

The proposed development area is not large scale and the SoS considers that the size and design of the development as a whole is unlikely to result in significant effects. Whilst the development will inevitably comprise a physical change to locality, the SoS does not consider that a significant environmental effect is likely in terms of topographical change or the production of waste relevant to the development concerned.

## *2 (a)-(c) (i) – (viii) regarding location of development*

The existing wellsite is primarily bare ground with oil drilling equipment and earth bunds around the edges. The extension area to its west is currently undeveloped and the LPA suggests it might be in agricultural use. The majority of the site area falls within Grade 3 agricultural land, indicating that the land quality is classified as Good to Moderate.

The entire site is within Flood Zone 1, representing low risk of flooding. The site does not fall within any designated landscape feature. No designated heritage assets present on site.

The site forms part of a wider landscape generally characterised as open countryside consisting of medium sized fields enclosed by a network of drains, hedgerows and trees. The B3390 is located approximately 165m to the west of the site.

A small group of residential properties are located immediately to the south of Waddock Cross, with Waddock Farm being the nearest property approximately 230m southwest to the site.

A group of surface water features (ponds) are located approximately 360m to the southwest, with the River Frome beyond.

The proposed development is surrounded by an ecological network, including:

- Oakers Wood Site of Special Scientific Interest ("SSSI"), immediately adjacent to the southeast. It supports uncommon species such as rare lichen.
- Dorset Heathlands, designated as Ramsar site, Special Protection Area and Special Area of Conservation, together with Oakers Bog SSSI, is located approximately 865m northeast of the site and directly northeast of Oakers Wood SSSI.
- River Frome SSSI is a major chalk stream lies approximately 535m southwest.
- Cull-Peppers Dish SSSI lie approximately 1.75km northeast.
- Turners Puddle Heath SSSI lie approximately 1.35km east.

Ancient woodland in the surrounding area includes Waddock Copse (160m west), Marl Pits Wood (500m northwest), and Oakers Wood (400m east).

Sites of Nature Conservation Interest ("SNCI") are identified in the vicinity, which are Marl Pits Wood (620m northwest), Bryantspuddle Heath (600m northeast) and Southover Heath (1.4km northwest).

A number of Grade II Listed Buildings are identified in the wider site area:

- Granary At Waddock Farm House, 255m southwest
- Waddock Farm House, Waddock Cross, 310m southwest
- Oakers Wood Cottage, 570m east
- Oakers Wood House, 710m northeast
- Oakers Wood Lodge, 825m northeast

There are 8 no. Scheduled Monuments within 2km of the site, most of them are located at least 1km to the north.

### *3(a) – (h) regarding characteristics of potential impact*

The SoS has considered the likely significant effects of the development on the environment in relation to the characteristics of the development and the location of the development with regard to the impact of the development on the factors specified in regulation 4(2), taking into account—

- (a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
- (b) the nature of the impact;
- (c) the transboundary nature of the impact;
- (d) the intensity and complexity of the impact;
- (e) the probability of the impact;
- (f) the expected onset, duration, frequency and reversibility of the impact;
- (g) the cumulation of the impact with the impact of other existing and/or approved development;
- (h) the possibility of effectively reducing the impact.

### **Use of natural resources**

The submitted information suggests that 1.047 million barrels of oil will be produced from the proposed development, which is a non-renewable resource.

While there is no defined threshold for significant use of natural resources, the SoS considers the extraction of this scale including drilling of two new wells in the extended area would involve the use of non-renewable natural resources, resulting in its irreversible loss and without the potential for mitigation of this effect. Overall, the effect on non-renewable natural resources could be significant in EIA terms and an environmental assessment is required.

### **Emissions to air**

Emissions to air is likely due to movements of Heavy Goods Vehicles ("HGVs"), drilling of new wells and oil combustion of extracted crude oil.

The LPA considers that the additional 4,992 HGV movements over an eight-year period of the proposed development is unlikely to result in significant effect on air emissions. The SoS agrees that emissions due to HGV movements is unlikely to be significant.

There is a potential for pollution from drilling of new wells and burning the extracted oil (i.e. flaring), however details regarding emissions from these two operational activities are not found in the information submitted with the current application. The LPA considers that the controls placed on the oil production facility through the Environmental Permitting regime to minimise emissions to air are

sufficient to reduce the risk of a significant environmental impacts for well sites of this scale. The applicant states that there is no intention to change any of the dust mitigation measures which are currently in place, which is one of the conditions attached to the existing planning permission.

Due to the limited available information regarding the emissions associated with drilling of new wells and flaring, combined with the presence of rare lichen communities that are sensitive to air pollution within the adjacent Oakers Wood SSSI (further details please refer to the ecology and biodiversity section below), the SoS considers it is not possible to conclude that there will be no significant air pollution effects on sensitive species and human receptors at this stage. Therefore, a precautionary approach is adopted and further assessment through EIA is required.

### **Ecology and biodiversity impact**

The proposed development requires removing and replacing the bund along the western edge of the compound to allow for site extension and construction of some on-site facilities, this will result in the loss of grassland. The submitted ecology assessment indicates that due to the requirement for site facilities, avoidance of habitat loss is not possible, however habitats will be created or reinstated to compensate for the loss of existing habitats within the site. The applicant will submit a Landscape and Ecology Management Plan ("LEMP") prior to the commencement of works to ensure protection of habitats and species within the site. Given mitigations will be implemented and there is no evidence suggesting that the habitat loss on site is of high ecological value, the SoS considers that potential impact on on-site habitats is unlikely to be significant.

In terms of potential impact on the surrounding ecological designations, the proposed development is located at the immediate west of Oakers Wood SSSI, which is a sensitive area as defined in Part 1 of the EIA regulations. Oakers Wood SSSI is of high ecological value and a 'habitat of principal importance' under Section 41 of the Natural Environment and Rural Communities Act 2026, it has many elements typical of ancient woodland and supports rare lichens. The ecology assessment concludes that there is a potential for construction impacts on the woodland, hence a Construction Environmental Management Plan ("CEMP") will be submitted to LPA for approval prior to the commencement of work.

Natural England ("NE") has been consulted by the LPA and states that potential air quality effects on lichen is their main concern. Although a survey conducted by the applicant showed that there has been no change in the nearby lichen communities since 2013, given the wellsite has not been operational during this time, NE's view is that there remains some uncertainty about possible effects on lichens from emissions and therefore recommends conditions on further monitoring of both lichens and air quality. As the operation of the proposed development involves combustion of extracted oil, the SoS considers that its air pollution impact on rare lichen cannot be ruled out, therefore a precautionary approach has been adopted and further assessment through EIA is required.

In addition, Dorset Heathlands, designated as a Ramsar site, Special Protection Area and Special Area of Conservation, is located approximately 865m northeast to the site. Heathland habitats are naturally low nutrient environments, and are therefore susceptible to the nutrifying effects of atmospheric nitrogen deposition. The potential sources of nitrogen deposition to Dorset Heathlands include emissions from vehicles, agricultural and industrial activities. The LPA considers that the additional HGV movements from the proposed development are unlikely to have significant effect, but there is no mention of the industrial emissions from the oilfield operation and its impact on the heathland habitat. The SoS considers the oilfield operation activities, such as oil combustion, are likely to contribute to nitrogen emissions and impacts on ecological sites (in particular those susceptible to the nutrifying effects) cannot be ruled out and further environmental assessment is required.

NE mentions that the bat interest in the area is significant and here the effect of lighting is therefore an issue. The LPA's Natural Environment Team has advised a lighting strategy is needed. The submitted ecology assessment and the lighting technical note indicate that the proposed nighttime lighting will only be operational during drilling work and will be temporary and over a short period of time, it is

concluded that there will be no adverse impact on rare bats. Therefore, the SoS considers that with the lighting strategy in place, potential impacts on bat communities are unlikely to be significant.

Overall, with the implementation of the CEMP, LEMP and lighting strategy, and the appropriate use of planning conditions, the SoS considers that effects on flora or fauna within the site and its surroundings are unlikely to be significant, except for lichen communities within Oakers Wood SSSI. Taking into account the technical assessments, views from NE and LPA, operational activities of the proposed development and the site's sensitive ecological setting, the SoS considers it is not possible to conclude at this stage that significant effect on ecological sites are not likely and further assessment is required.

### **Climate and transboundary impacts**

The proposed development involves extraction of crude oil and combustion. Its operational activities will produce direct and indirect greenhouse gas ("GHG") emissions, contributing to climate change.

The submitted information includes a Scope 3 GHG emissions assessment, which estimates the 'well-to-tank' emissions (from production, processing and transport); emissions from oil and gas combustion; and emissions from all HGV traffic movements. The assessment concludes that estimated GHG emissions would account for less than 0.03% of each relevant UK Carbon Budget. The LPA therefore considers the minimal portion towards the national Carbon Budget would not result in a potentially significant impact upon climate change.

In accordance with the 'Institute of Environmental Management Assessment ("IEMA") Guide: Assessing Greenhouse Gas Emissions and Evaluating their Significance, 2nd edition, 2022', projects with a 'business-as-usual' approach to emissions will result in a significant adverse effect on the achievement of emissions targets.

Based on the available information, the extraction of crude oil and combustion will result in a net increase of GHG emissions and no mitigations on reducing GHG emissions that are consistent with the net zero trajectory are proposed. Based on the IEMA guidance, it is not possible to conclude that there will be no likely significant transboundary effects on climate change.

### **Other matters**

#### Noise and vibration

Potential noise and vibration impact is likely to arise from vehicular movements, use of machinery and construction tools, and drilling operation (e.g. rig mobilisation). The applicant states that drilling operations will take place over a relatively short time period during its operation. A noise assessment was submitted for the approved planning application in 2013, but no updated information has been provided since then.

Given the sparsely populated site surroundings with the nearest residential receptor located 230m away from the site, the LPA considers the use of planning conditions such as limiting operational hours and applying noise limits would reduce nuisance.

The SoS considers that the background noise environment and the operational scope of the proposed development have not been changed significantly since the noise assessment was submitted, and with the relevant planning conditions in place, noise impact during construction and operation phases is unlikely to be significant. The SoS also considers the vibration impact will be of short term duration and can be managed through planning conditions. Overall significant vibration impact is unlikely.

#### Water contamination

The River Frome SSSI is located approximately 535m to the southwest. There is a potential risk of any water contamination due to discharges to groundwater from the wellsite affecting the SSSI designation, in addition to the Poole Harbour SPA, Ramsar and SSSI given that the River Frome discharges into

Poole Harbour. The site does not fall into any drinking water safeguard zones/ protected areas nor any source protection zones.

The applicant states that there are mitigation measures on site to reduce risk of water contamination. There is a tertiary containment system comprising an installed impermeable membrane system underneath the existing wellsite to filter surface water before discharging to the adjacent agricultural surface drains. The applicant also confirms that the same system will be installed underneath the extension area. In addition, three groundwater monitoring boreholes will be installed to monitor groundwater quality before, during and after drilling operations, and throughout the operation phase.

The LPA considers potential contamination risk on SSSI is unlikely to be significant with the controls placed through the Environmental Permitting regime; and the existing wellsite includes a containment system for spillages to reduce contamination risk. With the implementation of on-site surface water management system and monitoring, the SoS considers the risk of water contamination is unlikely to be significant.

### **Overall conclusions**

The Secretary of State has had regard to the characteristics of the development, the location of the development and the types and characteristics of potential impacts as set out above. Based on the available information and implications of the proposal, the Secretary of State considers there is likelihood of significant effects primarily in relation to the use of natural resources, air emissions, ecology and biodiversity and transboundary greenhouse gas emissions. EIA is therefore required.

In reaching this view the Secretary of State has carefully considered the information put forward by the applicant, the views of the LPA, representations from third parties, and all consultation responses.

This direction does not affect any duties of the requestor under other legislation, including The Conservation of Habitats and Species Regulations 2017.

Is an Environmental Statement required?	Yes
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