**Presentation to public meeting held at Pulborough 30 April 2017:**

**Kimmeridge Oil & Gas Limited (KOGL) - environmental permit consultation:**

**Broadford Bridge 1, Wood Barn Farm, Adversane Lane, Broadford Bridge Billinghurst, RH14 9ED.**

1. I am here to speak for the Sussex Branch of the Campaign for the Protection of Rural England (CPRE).

2 The Broadford Bridge site is located in countryside, hence our interest in and concerns about KOGL’s application to the Environment Agency, re their Environmental Permit.

2.1 We examined the documents presented by KOGL in support of their application; concluded that we should object and have therefore asked the Environment Agency to refuse the application.

**3. Why should the application be refused?**

**4. The impact that KOGL’s operation could or would have on the environment is a most crucial issue.**

4.1 We would therefore expect to see in KOGL’s application bundle an “Environmental Statement” in which potential harmful impacts are identified and appraised in the detail, and presented to the Environment Agency for them to consider.

4.2 Unfortunately, whilst KOGL’s ‘Site Condition Report’ refers to an ‘Environmental Statement’, KOGL’s application bundle does not include an Environmental Statement.

**5 According to KOGL’s ‘Site Condition Report, quote: “there are no statutory designated habitat sites within the Environmental Permit Application Boundary or its immediate vicinity”**

5.1 Notwithstanding this advice, the drill pad does lie in close proximity to designated ‘Ancient and Semi-Natural Woodland’ (Prince’s Wood and Gatewick Copse).

5.2 The impact that KOGL’s intended operation, including flaring of gas, noise emissions and lighting could or would have on this woodland, and protected species, including bats and birds, either residing in the wood or visiting, has to be an important consideration for the Environment Agency in the deciding of this application.

5.3 Potential impacts need therefore to be assessed and reported, to enable them to be considered by the Environment Agency’s decision takers.

**6. KOGL’s ‘Site Condition Report’ also advises that, “there are no protected sites within 10km” of their drill pad at Broadford Bridge.**

6.1 Presumably, protected sites here means Sites of Special Scientific Interest (SSSI) and sites with higher designation, in which case KOGL is mistaken, because there are at least 6 SSSI within 10km of the drill pad.

6.2 This is a most unfortunate omission.

**7. Unfortunate, too, is the apparent omission of an appraisal of whether compounds released by the flaring could or would impact on people, flora and fauna.**

**8. Also lacking is a map showing the prevailing downwind plume/hazard footprint of the compounds released by the flaring.**

**9. CPRE Sussex considers that a fundamental environmental starting point should be that no toxic substances, for which the effects are not known and/or cannot be completely controlled or wholly neutralised or removed after use, should be introduced into the environment, or inserted into the ground.**

9.1 We are therefore very concerned that as is shown by the Safety Data Sheets provided by the applicant the ECOTOXICITY effects of some of the chemical products that would be used and stored on the site are unknown and/or there is no information available for their persistence and degradability.

9.2. Without full information about all of the chemicals that would be used at the site, including their effects and interactions, their use should not be permitted.

**10. Regarding hydrological and geological aspects of the application, we sought and obtained advice from a qualified hydrologist and geologist. He is a member of CPRE and is a former Environment Agency employee**

10.1 His advice on hydrology and geology are included in our written submission to the Environment Agency.

10.2 We have nothing to add to David Smyth’s presentation on these matters to this meeting.

**11. To conclude**: We consider that the Environmental Permit application to should be refused – and that usage of the site for exploratory drilling should be the subject of a new application, requiring a public consultation, through West Sussex County Council.

Roger Smith

Dr R F Smith

Trustee CPRE Sussex

Chair CPRE Sussex’s Protect Sussex Group