

Development Management
North Lincolnshire Council
Church Square House
30-40 High Street
Scunthorpe
North Lincolnshire
DN15 6NL

24th February 2025

Dear Sir

REQUEST FOR A SECOND SCREENING OPINION - TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (ENGLAND) REGULATIONS 2017

PROPOSED NEW WELLS AND 600M UNDERGROUND GAS PIPELINE AT THE WRESSLE WELLSITE, LODGE FARM, APPLEBY, NORTH LINCOLNSHIRE (APPLICATION REFERENCE PA/2024/275)

I am writing to make a formal request in accordance with Regulation 6 (10) of the Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017 as amended ('the EIA Regulations') for a second screening opinion to determine whether the above proposal constitutes development that will require Environmental Impact Assessment (EIA).

This Screening Request includes relevant information listed under Regulation 6 (2) of the EIA Regulations (and contained in the online Planning Practice Guidance (PPG), as updated May 2020) to allow North Lincolnshire Council (NLC) to form its opinion.

The request is accompanied by the following plans and drawings which identify the Site and its local context:

- ZG-ER-W1-W2-PA-01 (Location Plan - Site of Application);
- ZG-ER-W1-W2-PA-02 (Location Plan);
- ZG-ER-W1-W2-PA-07 (Indicative Site Layout Plan – Drilling Phase); and
- ZG-ER-W1-W2-PA-19 (Indicative Gas Pipeline Route Plan).

Background

On 17th May 2023, Egdon Resources U.K. Limited ('Egdon') sought a screening opinion from NLC for the proposed development described above, together with an alternative underground gas pipeline from the wellsite to British Steel's Scunthorpe plant six km to the west of the Wressle wellsite.

NLC issued its screening opinion on 19th July 2023, stating that the proposed development would not have significant effects on the environment and that it was not EIA development. The screening opinion considered the impacts on climate in the following terms:

“The proposed production operations will result in the extraction of additional hydrocarbons from the site. How the production of hydrocarbons relates to Government obligations in respect of climate change and carbon budgets is a matter for future national policy. When assessing the likely environmental impact of the proposed development in respect of climate change, this assessment must be limited to a consideration of the emissions during construction, operation and decommissioning, together with any cumulative impacts.”

Egdon submitted a planning application on 29th February 2024 for the proposed development described above. The application was validated by NLC on 26th March (ref PA/2024/275). Planning permission was granted by NLC on 13th September 2024.

The decision was successfully challenged in the High Court by Sandie Stratford following the decision of the Supreme Court in R (Finch on behalf of the Weald Action Group) v Surrey County Council [2024] UKSC 20 (“Finch”). As a result, the planning permission, granted by NLC on 13th September 2024, was quashed by Mrs Justice Lang on 8th November 2024. The Order states at paragraphs 6 and 7:

“Whilst in Finch, the project was unarguably required to undertake an EIA given its scale and exceedance of the threshold in Schedule 1 of the EIA Regulations, the decision has clear parallels to the circumstances of this application in that extraction of hydrocarbons is proposed but the decision-maker did not consider the scale of any indirect effects arising from the combustion emissions.

“the Decision was taken [by NLC] without due consideration of the potential for likely significant effects arising from the combustion of the extracted hydrocarbons and the Council was arguably required to reconsider if the proposed development was an EIA development.”

This new screening request is accompanied by the following reports, prepared by Sustain:able, a specialist consultancy, following the High Court Order on 8th November 2024. A summary of their findings are included in this request.

- Scope 3, Category 11 Emissions Assessment
- Scope 1, 2 and 3 Emissions Forecast for Wressle Field Development

The main purpose of this letter is to provide sufficient information for NLC as the Mineral Planning Authority (MPA), to reconsider its judgement about the likelihood of the project giving rise to significant environmental effects, having regard to the Indicative Screening Thresholds referenced in the EIA Planning Practice Guidance and the estimated emissions likely to be produced as a result of the proposed development.

Egdon considers that the Proposed Development **does not** constitute EIA development for the reasons outlined within this letter.

Referencing

For referencing purposes, the following definitions have been adopted and are utilised from this point onwards:

- **the Proposed Development** – the proposal being put forward by Egdon as described below:
“Extension of existing Wressle wellsite to construct three well cellars; drill two additional lateral underground boreholes to appraise and develop the hydrocarbon resources from the Penistone Flags and Ashover Grit reservoirs; upgrade existing production facilities to include additional fluid storage tanks, separator system, surface pump and associated bunds; install gas processing equipment, construct a 600m underground gas pipeline and flow gas to the existing National Grid pipeline; long term production of oil and gas.”
- **the Site** – the area within the red line boundary of drawing ref. 'ZG-ER-W1-W2-PA-01 (Location Plan), calculated to be 3.9ha;
- **the wellsite** – comprises the current wellsite plus the proposed wellsite extension area, where the operational activity takes place within the red line boundary; and
- **the Site access track** – the existing private access road to the Site, off the B1208.

The Site and Surrounding Area

Egdon currently operates the Wressle-1 wellsite which is located within PEDL182 in North Lincolnshire. The Wressle oilfield was brought onstream on schedule in January 2021 under natural flow, and oil is currently produced by means of a surface “jet lift” pump system.

The Site occupies an area of 1.85 hectares (ha) and includes the existing wellsite with an associated access track and a small extension for the installation of additional security facilities. The wellsite includes earth bunds and is enclosed by a security fence.

The Wressle-1 wellsite is located within the administrative boundaries of North Lincolnshire Council and Broughton Town Council, whilst the access track lies within the parish of Appleby. The Site is located approximately 1.6 km to the northwest of the village of Wressle and 6 km east of the town of Scunthorpe.

The wellsite is located within an arable field to the east of Lodge Farm. It lies outside any defined settlement boundary and is located within the open countryside. The settlement pattern is dispersed and sparse with very few properties in the vicinity of the Site. Access to the Site is via an access farm track from the B1208.

The Site forms part of a wider landscape generally characterised as open countryside consisting of medium-sized fields enclosed by a network of drains, clipped hawthorn hedgerows and trees. Blocks of woodland areas are located to the west, north and east

of the Site, including the Rowland Plantation present to the west and north. The Site access track runs adjacent to the buildings of Lodge Farm.

Planning History

In January 2020, Egdon obtained planning permission on appeal, for the retention of Wressle-1 wellsite and access track for the production of hydrocarbons. This followed a refusal for planning permission by NLC in November 2018. Pre-commencement conditions, as per the Appeal Decision notice ref. APP/Y2003/W/19/3221694 were discharged by October 2020 prior to development taking place at the Site.

In May 2023, Egdon sought a screening opinion from NLC for the Proposed Development described above, together with an underground gas pipeline from the wellsite to British Steel’s Scunthorpe plant six km to the west.

NLC issued its screening opinion on 19th July 2023, stating that the proposed development would not have significant effects on the environment and that it was not EIA development.

Egdon subsequently submitted a planning application on 29th February 2024 for the Proposed Development. The application was validated by NLC on 26th March (ref PA/2024/275). Planning permission was granted by NLC on 13th September 2024.

The decision was successfully challenged in the High Court by Sandie Stratford following the decision of the Supreme Court in R (Finch on behalf of the Weald Action Group) v Surrey County Council [2024] UKSC 20 (“Finch”). As a result, the planning permission, granted by NLC on 13th September 2024, was quashed by Mrs Justice Lang on 8th November 2024.

NLC is now required to redetermine the planning application (ref/2024/275).

The relevant planning history relating to the Site is summarised in Table 4-1, below.

Table 4-1 Wressle 1 Wellsite Planning History Summary

Application Number	Description	Date of Decision
MIN/2013/0281	Planning permission for the construction of a temporary wellsite for drilling of an exploratory borehole with associated structures and works.	18 th June 2013 Granted.
PA/2016/808	Planning permission to install four groundwater monitoring boreholes at the existing Wressle 1 well site	11 th January 2017
MIN/2016/810	Planning permission for the retention of the existing 'Wressle -1 Well' wellsite and access road for long term production of hydrocarbons	11 th January 2017 Refused.
PA/2017/696	Planning permission for the retention of the existing 'Wressle-1 Well' well site and access road for long-term production of hydrocarbons (resubmission of MIN/2016/810).	3 rd March 2017 Refused.
PA/2017/268	Application for variation of condition 24 of MIN/2013/0281 to allow the retention of the well site for a further twelve months.	3 rd July 2017 Refused.
APP/Y2003/W/17/3173530	Appeal against refusal of planning permission for the retention of the existing 'Wressle-1' wellsite and access road for the long-term production of hydrocarbons (MIN/2016/0810)	4 th January 2018 Dismissed.

MIN/2016/81	Planning permission for the retention of the existing 'Wressle-1 Well' wellsite and access road for long term production on hydrocarbons.	4 th January 2018 Refused.
APP/Y2003/W/17/3180606	Appeal against the refusal of planning permission for the retention of the existing 'Wressle-1' wellsite and access road for the long-term production of hydrocarbons (PA/2017/696).	4 th January 2018 Dismissed.
APP/Y2003/W/17/3182879	Appeal against the variation of Condition 24 of planning permission ref: MIN/2013/0281 (PA/2017/268).	4 th January 2018 Allowed.
PA/SCR/2018/7	EIA screening opinion relating to the retention of the well-site at Lodge Farm, Wressle.	31 st May 2018 EIA Not Required.
PA/2018/794	Planning permission for the variation of condition 11 on appeal number APP/Y2003/W/17/3182879, decision date 4 January 2018.	6 th August 2018 Refused.
APP/Y2003/W/18/3212137	Appeal against the refusal of planning permission for the variation of condition 11 (PA/2018/794).	24 th January 2019 Allowed.
PA/2018/1316	Planning permission for the retention of Wressle-1 wellsite and access track for the production of hydrocarbons, together with an extension of the site by 0.12 ha for the installation of additional security facilities; site reconfiguration to facilitate the installation of a new impermeable membrane, French drain and surface water interceptor; construction of a new bund, tanker loader plinth and internal roadway system; installation of up to two additional groundwater monitoring boreholes and deepening of three existing groundwater monitoring boreholes; well operation; installation of production facilities and equipment; instillation of gas engine and electrical grid connection; oil and gas production for a temporary period of 15 years; and restoration to arable land.	29 th November 2018 Refused.
APP/Y2003/W/19/3221694	Appeal against the refusal of planning permission PA/2018/1316.	17 th January 2020 Allowed.
PA/2020/1410	Hazardous Substances Consent for the storage of crude oil	20 th May 2021 Allowed.
PA/SCR/2023/4	EIA Screening Request	19 th July 2023 Not EIA

PA/2024/275 an extension of the existing wellsite to construct three well cellars, drill two additional lateral underground boreholes to appraise and develop the hydrocarbon resources from the Penistone flags and Ashover grit reservoirs, upgrade existing production facilities to include additional fluid storage tanks, separator system, surface pump and associated bunds, install gas processing equipment, construct a 600m underground gas pipeline and flow gas to the existing national grid pipeline and the long term production of oil and gas
To be determined

Environmental Considerations

Ecology

There are no Special Protection Areas (SPAs), Special Areas of Conservation (SACs), National Nature Reserves (NNRs) or Local Nature Reserves (LNRs) within 2 km of the Site.

There are two Sites of Special Scientific Interest (SSSIs) within 2 km of the Proposed Development, including:

- Broughton Far Wood, 600m west of the wellsite; and

- Broughton Alder Wood, approximately 660 m to the southwest of the wellsite.

There are two Ancient Woodland sites located within 2 km of the Site:

- Far Wood (part Ancient Replanted Woodland and part Ancient & Semi-Natural Woodland), located 200m west of the Site access track and 850m west of the wellsite;
- Spring Wood Ancient Replanted Woodland, 620m west of the Site access track and 1.2km west of the wellsite.

There are six non-statutory designated sites within 1 km of the Site:

- Clapgate Pit Lincolnshire Wildlife Trust Reserve, 650m west of the wellsite;
- Rowlands Plantations Local Wildlife Site (LWS), a local woodland site, located 280m north of the wellsite;
- Broughton Far Wood and Heron Wood LWS, located 300m west of the Site and 900m west of the wellsite;
- Broughton East Wood LWS, a local woodland site, located 400m southwest of the Site and 720m southwest of the wellsite;
- Far Wood Farm Meadow LWS, 640m southwest of the Site; and
- Heron Wood LWS, 680m west of the Site.

Cultural Heritage

There is one Scheduled Monument located within 2 km of the Proposed Development. Thornholme Augustinian Priory is located 1.5 km to the north of the Site.

There are 10 listed buildings within 2km of the site, the closest Grade II listed buildings being:

- ‘Broughton Grange Farmhouse’ and “Broughton Coach house/stables” approximately 550m south of the proposed pipeline and 730m south of the wellsite
- “Springwood Cottage” and “Stables” approximately 1.3km northwest of the proposed pipeline and 1.6km west of the wellsite
- ‘Broughton Bridge’, Grade II listed, 1.7km southeast of the wellsite.

There are no World Heritage Sites located within 5 km of the Site, nor are there any conservation areas or non-statutory designated heritage assets (i.e. registered battlefields or registered parks and gardens) within 2 km of the Site.

Hydrology and Hydrogeology

According to the Environment Agency (EA) online flood map for planning¹, the Site lies within Flood Zone 1, being land at very low risk of flooding from fluvial sources (land having a less than 1 in 1,000 annual probability of flooding from rivers or the sea).

The nearest watercourse is Ella Beck which borders the wellsite and Site access track. This watercourse would be crossed by the proposed pipeline. There are a series of small agricultural drains, dykes and ponds located within 1 km of the Site.

The Site is not located within a Source Protection Zone (SPZ), Drinking Water Safeguard Zone (Surface Water) or Drinking Water Safeguard Zone (Groundwater). The Site is located within a Drinking Water Protected Area (Surface Water) and a Nitrate Vulnerable Zone (NVZ).

According to the British Geological Survey (BGS), the superficial drift underlying the Site is classed as Secondary A aquifer, as shown on the Aquifer Designation Map (Superficial Drift) (England). Due to the varied bedrock underlying the Proposed Development, there are areas classed as Principal Aquifer, Secondary A, Secondary B and Secondary (undifferentiated) aquifer, as shown on the Aquifer Designation Map (Bedrock) (England). The wellsite is underlain by Secondary B aquifer.

Air Quality

The Site does not fall within an Air Quality Management Area (AQMA). It is located within a rural setting, which infers that the Site is not located in an area where pollutant concentrations are considered to be at risk of exceeding the national air quality strategy objectives.

Landscape and Visual

The Site does not fall within an area designated either nationally or locally for its landscape value.

The Site falls within National Character Area (NCA): 45 Northern Lincolnshire Edge with Coversands, which exhibits an open arable landscape and a sparse settlement pattern due to the prominent limestone scarp slope of Lincoln 'Cliff'.

In terms of local landscape character, the land within a 6km radius from the wellsite falls within three Landscape Character Areas (LCA)²:

- Lincolnshire Edge
- Vale of Ancholme and

¹ Environment Agency (2025). *Flood Map for Planning*. Available at: [EA Flood Map](#)

² North Lincolnshire Council (2021). *North Lincolnshire Landscape Character Assessment*. Available at: [Landscape Character Assessment](#)

- Lincolnshire Wolds

Land use surrounding the Site is agricultural in nature; the character of the area is open countryside with field boundaries marked by ditches, trees, and hedgerows.

Land Quality

The Natural England Regional Agricultural Land Classification (ALC) map for the Yorkshire and The Humber (ALC003)³ shows that the wellsite is located within an area of ALC Grade 3 'good to moderate' land. The ALC and Soil Resource Survey submitted with the planning application ref PA/2024/0275) confirmed that the ALC of the site is Grade 3b.

Residential Receptors

There are a number of residential properties in the vicinity of the Proposed Development:

- North Cottage, located 500 m west of the wellsite;
- Broughton Cottages, located approximately 290 m south of the proposed pipeline and 620 m southwest of the wellsite;
- Broughton Grange, located approximately 540 m south of the proposed pipeline and 730 m south of the wellsite;
- Jerry Green Dog Rescue, located approximately 700 m southwest of the wellsite and immediately adjacent to the pipeline connection point

The nearest settlements in the vicinity of the Proposed Development include:

- the village of Wressle, located approximately 1.4 km south of the wellsite;
- the market town of Broughton, located approximately 1.5 km south west of the wellsite;
- the village of Appleby, located approximately 3.8 km northeast of the wellsite; and
- the town of Scunthorpe, located approximately 6 km west of the wellsite.

Public Rights of Way

According to Rowmaps⁴, the closest Public Right of Way (PRoW) is a public footpath ref BROU15, located 180 m west of the proposed pipeline and 670m to the west of the wellsite. in the vicinity of the Proposed Development.

Outline of the Proposal

Egdon has submitted an application for an extension of the existing wellsite for the development of two new wells (Wressle-2 and Wressle-3) to target the Ashover Grit and

³ Natural England (2018). *Agricultural Land Classification Yorkshire and The Humber (ALC003)*. Available at: [ALC 003](#)

⁴ Rowmaps (2022). *Rowmaps*. Available at: [Rowmaps](#)

Penistone Flags reservoirs. Egdon also intends to lay one underground gas pipeline to connect to the gas network.

The Proposed Development can be summarised into the following 5 phases:

Phase 1: Site Construction of extension with associated works:

- a 0.67 ha extension to the current site on its south-east border;
- Site clearance and drainage civil works to enable construction of the extension and install well cellars

Phase 2: Drilling of Wressle-2 and Wressle-3:

- consecutive drilling of wells in a single operation;
 - Wressle-2 is to be drilled in a southerly direction, Wressle-3 is to be drilled in a south-westerly direction;
- a workover rig may be used to install well completion equipment;

Phase 3: Production testing:

- Initial production testing;
- Proppant squeeze;
- Follow up production testing into the existing facilities

Phase 4: Production:

- Site Civils Works
- Installation of Enhanced Production Facilities
- Production
- Gas to Grid - installing process equipment onsite to enable export of gas via an underground gas pipeline to the local gas transmission network located 600 m to the south west of the Site.

Phase 5: Well decommissioning and Site restoration:

- restoration to agricultural use or approved new use appropriate to the area; and
- wells abandoned using agreed programme or method, approved by the Health & Safety Executive, the EA and the NSTA.

Each development phase is described in more detail in the Planning Statement that accompanies the planning application.

EIA Screening

With regard to considering the requirement for Environmental Impact Assessment (EIA) in relation to the Proposed Development, it is noted that the Proposed Development may fall within Schedule 2:

Category 2 (d) extractive industry - deep drillings – where the applicable threshold and criteria in column 2 is “in relation to any type of drilling, the area of the works exceeds 1 hectare...”

Category 2 (e) extractive industry - surface industrial installations for the extraction of coal, petroleum, natural gas and ores, as well as bituminous shale – where the applicable threshold and criteria in column 2 is “the area of the development exceeds 0.5 hectares”

Category 10 (k) infrastructure projects – oil and gas pipeline installations and pipelines for the transport of carbon dioxide streams for the purposes of geological storage – where the applicable threshold and criteria in column 2 is “(i) the area of the works exceeds 1 hectare; or (ii) in the case of a gas pipeline, the installation has a design operating pressure exceeding 7 bar gauge.”

The Proposed Development meets the applicable threshold and criteria in Column 2 and therefore must be screened against the selection criteria in Schedule 3.

The selection criteria for screening Schedule 2 development (contained within Schedule 3) is applied in the case of the Proposed Development. When determining whether the Proposed Development is likely to result in any significant environmental effects, Schedule 3 states that consideration should be given to the following:

- characteristics of the development;
- location of the development; and
- types and characteristics of the potential impact.

The EIA PPG states (inter alia):

“When screening Schedule 2 projects, the local planning authority must take account of the selection criteria in Schedule 3 of the 2017 Regulations. Not all of the criteria will be relevant in every case. Each case should be considered on its own merits in a balanced way.

Only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment.

To aid local planning authorities to determine whether a project is likely to have significant environmental effects, a set of indicative thresholds and criteria have been produced.

However, it should not be presumed that developments above the indicative thresholds should always be subject to assessment or those falling below these thresholds could never give rise to significant effects, especially where the development is in an environmentally sensitive location.

Each development will need to be considered on its merits.”

Potential for Significant Environmental Effects

Scale of the Development

With regard to the scale of the Proposed Development, the following points are considered relevant:

- the Site comprises approximately 1.85 ha with an access road, which has been in place since 2013 without giving rise to any known significant environmental effects. The Proposed Development includes an extension to the wellsite of 0.67 ha as well as the laying of a 600m underground gas pipeline;
- the Proposed Development is to be undertaken at an existing wellsite and will therefore not be out of context in relation to the scale of the development;
- the tallest structure on Site will be the drilling rig (38m in height). Drilling is expected to last 21 weeks with the two new wells drilled back-to-back. The landscape and visual assessment that accompanied the planning application has assessed the height to be 43m as a worst-case scenario;
- If gas volumes produced are sufficient, it is planned to utilise this for export to the local gas network. Any residual gas will be utilised to generate electricity for Site use using a gas engine;
- drilling operations will take place over a relatively short time period, whereas hydrocarbon production will take place over a longer, but temporary period of 15 years. Thereafter, the wellbores and Site will be restored in accordance with industry best practice and the requirements of the MPA.

Considering the above it is concluded that the Proposed Development is not likely to have significant environmental effects by virtue of its scale.

Nature of the Development (including Greenhouse Gas Emissions)

With regards to the nature of the Proposed Development:

- the Proposed Development will retain the existing Site for a longer period of time, which already benefits from a temporary planning permission of 15 years; the current planning permission for production, granted on appeal in January 2020, was deemed by NLC not to require an EIA;
- the new proposed wells will be of a similar nature to the drilling operation undertaken for the Wressle-1 well in 2021. This will allow Egdon to assess the production potential of the Ashover Grit and Penistone Flags reservoirs;
- following an internal assessment which revealed potentially commercial hydrocarbon resources, a planning application which also includes for long term production at the Site is considered a natural progression of the operations that have historically been undertaken. The Minerals PPG acknowledges that a planning application can cover more than one phase of hydrocarbon extraction (Paragraph: 094 Reference ID: 27-094-20140306);

- the development is not expected to use significant amounts of natural resources, such as land, soil, water, nor is it expected to produce significant amounts of waste, pollution, or nuisances; and
- it is not expected that the Proposed Development will result in a significant risk of major accidents and/or disasters, or to human health.

Greenhouse Gas Emissions

Scope 3 Category 11 emissions (downstream emissions associated with combustion of hydrocarbons)

Egdon has commissioned *Sustain:able*, a UK-based consultancy specialising in providing advice about emissions to companies in the energy sectors, to prepare two reports to support the current planning application. These reports are included with this Screening Opinion Request.

The first report assesses the Scope 3 Category 11 (the use of sold product) emissions in relation to produced hydrocarbons from the Wressle wellsite. The assessment includes future emissions from the existing Wressle 1 well, and the proposed Site extension that will enable the drilling and production of hydrocarbons from two new wells, Wressle 2 & 3, and the construction and commissioning of a new gas export pipeline.

Two scenarios were evaluated using the 3P⁵ production forecast to represent a 'reasonable worst case':

- A. Emissions from specific refinery products derived from the sale of oil produced from Wressle, and combustion of all sold gas.
- B. Resulting emissions assuming all sold oil and gas is combusted.

Wressle-1

Total sold oil from Wressle 1, (based on the 3P Production Forecast) from 1st January 2025 through to the end of 2034 (when the current planning permission ends) is forecast to be 311,580 barrels, or 41,233 tonnes of oil. Total forecast Category 11 emissions from the existing Wressle-1 well are estimated to be 121,216 tonnes of carbon dioxide (tCO₂e) (Scenario A) and 129,885 tCO₂e (Scenario B).

Wressle 2 & 3

The proposed development, which includes the drilling of the Wressle 2 & 3 wells, is assumed to commence in 2026. Total sold oil, (based on the 3P Production forecast) is calculated as 1,039,733 barrels, or 137,594 tonnes across the lifespan of the development (2025-2039). Commissioning of the gas export pipeline as part of the field extension will enable produced gas to be sold, which is forecast to be 5.264 BCF or 122,221 tonnes gas. Total forecast Category 11 emissions from the proposed extension are estimated to be 759,187 tCO₂e (Scenario A) and 788,115 tCO₂e (Scenario B).

Total future Category 11 emissions for the remaining field life (including the planned development) are estimated to be 880,402 tCO₂e (Scenario A) and 917,999 tCO₂e (Scenario B).

⁵ Proven, Probable and Possible production forecast volumes representing the highest estimate of reserves

Scope 1, 2 and 3 emissions (non-Category 11)

This second report assesses future Scope 1, 2 and 3 GHG emissions from both the existing Wressle 1 and proposed Wressle 2 & 3 wells. These are emissions which collectively, to varying degrees, are within the control of a company has over the emissions sources. Again, the 3P Production Forecast has been used to represent the “worst-case” in respect of associated emissions.

- Scope 1 emissions are direct emissions from owned or controlled sources, such as fuel combustion in on-site power and production facilities, gas flaring and venting.
- Scope 2 emissions are indirect emissions from purchased electricity, steam, or heat used in operations, such as power utilised from the national grid.
- Scope 3 emissions encompass indirect emissions from the value chain, including emissions from suppliers, transportation of crude oil, and, most significantly, the combustion of sold oil and gas products by end users.

The emissions arising from Scope 1, 2 and 3 activities were calculated to produce an overall absolute emissions estimate for the project throughout the expected 15-year field life.

The total ‘reasonable worst-case’ project emissions are estimated to be 89,732 tCO₂e. This has been split into Scope 1 (74,031 tCO₂e), Scope 2 (10,408 tCO₂e) and Scope 3, excluding Category 11 (5,293 tCO₂e), with Scope 1 emissions accounting for 83% of the total emissions.

The most significant sources of emissions are related to power generation, where the forecast use of diesel and gas engines on Site, and electricity purchased from the national grid accounts for 45% of emissions. Venting (30%), and flaring (19%) account for the majority of remaining emissions.

Development emissions; UK Carbon Budgets and North Lincolnshire Carbon Budget

The future Category 11 emissions from the Wressle development represent a minor fraction of the UK Carbon Budget, with the highest impact during the 5th Carbon Budget period (2028-2032), amounting to 0.0216% and 0.0224% of the budget for Scenario A and B, respectively.

When adding in Scope 1, 2 and 3 emissions to the Category 11 emission calculations, the period of highest total forecast emissions, falls within the 5th Carbon Budget period between 2028-2032. During this time, the total project emissions (including Category 11 emissions) will amount to approximately 0.0241% of the UK Carbon Budget.

It is relevant to compare Wressle Scope 1, 2 and 3 emissions against the Carbon Budget for North Lincolnshire rather than the UK as a whole, since it would be North Lincolnshire where the majority of these Wressle-related emissions will be generated. The Tyndall Centre for Climate Change Research at the University of Manchester has calculated carbon budgets for all local authority areas up to the year 2100 ([Tyndall Carbon Budget Reports](#)). The largest proportion of Wressle development Scope 1-2-3 emissions (excluding Category 11) is

expected to be during the North Lincolnshire 6th Carbon Budget (2033 – 2037) when 19,000 tonnes equivalent of CO₂ will be produced, equating to 0.55%

Location of the Development

With regard to the location of the development:

- the Proposed Development is located on a previously developed wellsite with temporary planning permission for an exploratory borehole and production for conventional hydrocarbons and is therefore considered appropriate for its location;
- the wellsite is bounded to the north and south by agricultural land, and to the east and west by woodland. It is not in a densely populated area, being generally remote and rural in nature with no residential properties within 400 m of the wellsite, with mature woodland in-between;
- there are three SSSIs within 2 km of the Proposed Development, with the Pipeline route running adjacent to Broughton Far Wood, it is considered unlikely that the Proposed Development will have any significant impacts on these receptors;
- there is one Scheduled Monument within 2 km of the Site, Thornholme Augustinian priory is located approximately 1.5 km north of the Site; it is considered unlikely that the proposal will have any significant impacts on this asset; and
- the Proposed Development would have a number of socio-economic benefits at both the national and local level through inputs into the local economy through job creation and retention, business rates, use of local suppliers and businesses.

For the majority of topics that would normally be considered for a development of this kind, it is unlikely that significant effects would occur as a consequence of the Proposed Development. It is assumed that dust, noise, impacts on ecology and the pollution on land or water could be avoided completely or reduced to non-significant levels through the implementation of standard mitigation and best practice measures. It is therefore concluded that the proposed development is unlikely to have significant environmental effects by virtue of its location. It is worth pointing out that the impacts of the development have, and will be, assessed through third-party studies, which support the above conclusions.

Environmental Protection

With regard to environmental protection:

- the existing Site was built with high levels of environmental protection; a HDPE impermeable membrane was installed in accordance with an approved and verified Construction Quality Assurance Plan (CQA) and this tertiary containment system prevents any percolation of fluids down into soils or groundwater. This impermeable membrane would be installed in the proposed site extension and connected to the existing Site;
- if additional onsite storage tanks are required, these will be installed in a new concrete bund, the design and installation of which will be in accordance with a separate CQA plan;

- all operational phases will be implemented in accordance with the conditions and criteria as set out within the Environmental Permit, and the Environmental Management System designed to ensure compliance with the Permit;
- groundwater monitoring boreholes have been installed on the Site; monitoring of groundwater – and surface water from the nearest surface water course – was implemented before, during and after the drilling of the Wressle-1 well, and has continued to be applied to date. The results of the monitoring process continue to show that site activities have had no impact on groundwater quality;
- ground and surface water monitoring will continue in line with the requirements of the environmental permit to demonstrate that Site activities are having no impact on water quality; and
- noise monitoring would be undertaken during all phases; this was applied during the drilling of the Wressle-1 well and demonstrated that noise thresholds set out as Planning Conditions were not breached through past operations on Site.

Current Controls

In addition to the above, the extant planning permission for the Wressle-1 wellsite (ref. APP/Y2003/W/19/3221694) includes a number of conditions designed to control and mitigate impacts on the environment. It is expected that the same measures will apply and will be implemented as required under relevant conditions attached to any forthcoming grant of planning permission. With this, and through the implementation of standard mitigation and best practice measures, it is assumed that most environmental impacts could be completely avoided or reduced to nonsignificant levels.

A) Noise and Vibration

Conditions 4 - 12 of appeal permission ref. APP/Y2003/W/19/3221694 relate to noise. These conditions were put in place to protect the amenity of the surrounding area and nearby residential properties by imposing operational hours (including HGV movements and rig mobilisation and demobilisation), noise limits and a noise management plan. The noise management plan required by condition 4 (and as approved by NLC) was implemented during the drilling of the Wressle-1 well and noise thresholds of conditions 8-11 were not breached.

It is expected that any planning permission for this application would have the same conditions relating to noise. Due to these controlling conditions and the noise management plan currently in place, it is not expected that the Proposed Development will have any significant negative impact from noise beyond that which has already been deemed acceptable.

The current planning application is accompanied by a noise assessment which assesses the noise impact of the Proposed Development on nearby residential properties and identify appropriate mitigation if necessary. Noise monitoring will again be implemented during the operational phases.

The Council's Environmental Health officer⁶ considered that the mitigation, via the use of planning conditions, of the effects of the development with regard to the adverse effects of noise are appropriate and proportionate and will adequately protect the amenity of neighbouring residential properties.

Having due regard to the submission of expert consultants appointed in support of the application and the responses of the council's Environmental Health officer the planning officer considered that the mitigation, via the use of planning conditions, of the effects of the development with regard to the adverse effects of noise are appropriate and proportionate and will adequately protect the amenity of neighbouring residential properties.

B) Ecology

Condition 18 of permission ref. APP/Y2003/W/19/3221694 relates to biodiversity. This condition is in place to minimise the impact on biodiversity to ensure the works and biodiversity enhancements are carried out in accordance with previously submitted ecological appraisal.

The current planning application is accompanied by a Preliminary Ecological Appraisal (PEA) which includes consideration of the impact of the Proposed Development on ecological receptors, including designated ecological sites, habitats, protected species.

Having reviewed the submissions of the expert consultants appointed in support of the application and taking into account the consultation responses from Natural England and the council's own internal ecologist, the planning officer considered that the proposed development is unlikely to have any adverse impact on protected or notable species or habitats and that mitigation of the effects of the development with regard to the natural environment, including the proposed biodiversity enhancements, are both appropriate and proportionate.

C) Water

Condition 15 of permission ref. APP/Y2003/W/19/3221694 relates to the water environment. This condition was put in place for the protection of water quality through monitoring groundwater conditions through groundwater monitoring boreholes. This monitoring has shown no negative effect to groundwater from the Site.

The Site lies within Flood Zone 1, classified as an area with low risk of flooding. The existing Site has been built with the installation of a HDPE impermeable membrane that forms the tertiary containment system. As part of the planning application, it is proposed to install the same impermeable membrane within the Site extension that will connect to the membrane in the existing Site, and to reconfigure the containment system to extend across the entire working platform. This will mean that surface water will be managed onsite as it is at present where clean surface water is able to percolate down to this liner and then into the perimeter containment system, where it is

⁶ Delegated Officer's report 13 September 2024

discharged to the adjacent Ella Beck after filtration through the surface water interceptor. This provides mitigation against the risk of any polluting materials permeating into sub-surface soils or groundwater. Surface water monitoring will continue through the life of the Site in accordance with the conditions and parameters as set out within the Environmental Permit.

The current planning application is accompanied by a flood risk assessment (FRA) and surface water drainage assessment which considers the impact of the Proposed Development on the water environment.

Having reviewed the submissions of the expert consultants appointed in support of the application and taking into account the consultation responses from the Environment Agency and the council's own internal departments, the planning officer considered that the risks of an adverse impact upon groundwater is very low and that there would be appropriate measures in place to ensure the protection of ground and surface water and nearby watercourses. No significant impacts are anticipated in respect of flood risk or drainage.

D) Lighting

Condition 13 of permission ref. APP/Y2003/W/19/3221694 relates to lighting. This condition was put in place to control the lighting of the Site in the interests of residents' amenity. The planning application will be accompanied by site plans for each phase; where site or operational lighting will be required, this will be indicated on the site plans. There will be the need for 24 hour manning onsite until production stabilises; after this point it is expected that the Site will be un-manned at nights, and as such lighting will not be required, save for operational needs. Well drilling is short term and will be a 24 hour operation; a light impact assessment will be undertaken to cover phases where lights are required, and this will accompany the Planning Application.

The planning application is accompanied by a lighting assessment. The council's Environmental Health officer has considered the assessment and agrees with its conclusions. A condition is recommended to secure the mitigation measures set out in the Lighting Assessment. This condition aligns with the lighting condition in force on the existing wellsite and has been discussed and agreed with the applicant. Having given due regard to the submission of the expert consultants appointed in support of the application and the response from the council's expert Environmental Health Officer, the planning officer considered that the risks of an adverse impact arising from the use of external/artificial lighting is very low and that these impacts are capable of being controlled by the suggested planning conditions.

E) Air Quality

Condition 14 of permission ref. APP/Y2003/W/19/3221694 relates to air quality.

This condition was put in place to ensure dust mitigation measures are adhered to and to ensure no waste is burnt onsite. The Proposed Development does not intend to change any of the dust mitigation measures which are currently in place and it is

therefore not anticipated that there would be any negative effect as a result of dust that has not already been deemed acceptable.

The planning application is accompanied by an air quality assessment.

The Council's Environmental Health officer has considered the submitted Air Quality Assessment and has confirmed agreement with the conclusions of the report. In particular, they agree that the air quality impacts associated with the construction phase can be adequately controlled via mitigation measures implemented through a Construction Environmental Management Plan (CEMP) and recommend a conditions to secure this mitigation. This condition has been discussed with and agreed by the applicant.

Having given due regard to the expert information submitted in support of the application and the consultation responses from experts within the Environment Agency and the council's Environmental Health department, the planning officer considered that the risks of an adverse impact upon air quality, either in respect of local residents or sensitive habitats, is very low and that there would be appropriate measures to ensure the protection of air quality. It should be noted that an update to the Air Quality Impact Assessment (AQIA) will be submitted with the Planning Application.

F) Traffic and Transport

Conditions 3 and 5 of planning permission ref. APP/Y2003/W/19/3221694 relate to traffic and transport.

These conditions were put in place in for highway safety reasons and to provide operational hours from HGV movements. No changes to the vehicular access to the Site from the access track from the B1208 will result from the Proposed Development. Estimated HGV vehicle movements for each phase have been outlined and no changes are requested to the current HGV delivery hours currently in place.

The planning application is accompanied by a Transport Statement which considers the impact of the Proposed Development on the local highway network. The council's Highways department has considered the submitted Transport Statement and agrees with its conclusions. The highways officer recommends conditions to protect highway safety and to secure the management of traffic in accordance with the details set out in the Construction Phase and Operational Phase Traffic Management Plan. These proposed conditions have been discussed and agreed with the applicant.

Having given due regard to the submission of the expert consultants appointed in support of the application, the representations received in opposition to the application and the response from the council's expert Highways officer, the planning officer considered that the impacts of the vehicle movements associated with the proposed development are limited and thereby, taking account of the proposed mitigation of those effects (e.g. timings of HGV movements etc.) to safeguard the amenity of local

residents, the proposals are considered acceptable insofar as their effects on traffic and highway safety.

G) Greenhouse Gas Emissions and Climate Change

The period of highest expected production and sales of oil and gas from the Wressle Field, and hence the period of highest total forecast emissions, falls within the 5th Carbon Budget period between 2028-2032. During this time, the total project emissions (including Category 11 emissions) will amount to approximately 0.0241% of the UK Carbon Budget. This is judged to be not significant and consequently, the proposed development is not EIA development.

The largest proportion of Scope 1-2-3 emissions is expected to be during the 6th Carbon Budget when 19,000 tonnes of CO₂ will be produced. Expressed as a percentage of the North Lincolnshire carbon budget of 3.4 million tonnes, it represents less than 0.6%. This, too, is judged to be not significant and consequently, the proposed development is not EIA development.

Conclusion

The Proposed Development does not constitute development which requires an EIA as it is unlikely that the Proposed Development will result in significant effects on the environment by virtue of its size, nature, or location.

If the Authority is minded to adopt a 'negative' Screening Opinion (i.e. that the proposal is not EIA development), it is proposed that the planning application will be supported by the following technical reports, which are in addition to those that have been already submitted:

- Scope 3, Category 11 Emissions Assessment
- Scope 1, 2 and 3 Emissions Forecast for Wressle Field Development
- Updated Air Quality Assessment
- An addendum to the Ecological Appraisal

In accordance with Regulation 6 (6) of the EIA Regulations we look forward to your response within 21 days of the date of receipt of this request. Should you require any further information or clarification to assist in the issuing of the Screening Opinion please do not hesitate to contact me using the details below.

Yours faithfully,


Paul Foster

