

From: Ian Gray EI

Sent: 18 January 2017 15:42

To: [REDACTED]

Cc: Alan Stones EI <alan.stones@surreycc.gov.uk>; Samantha Murphy EI <samantha.murphy@surreycc.gov.uk>

Subject: Brockham Well Site, Surrey

Dear Mr Tidswell,

1/. I write further to communication with Samantha Murphy regarding concerns expressed about the movement of HGVs within the site and night time operations, with the resulting noise and light emission.

Following the information that you provided in December 2016 for Officers to consider in relation to the workover rig, maintenance works and data logging, it was confirmed by the County Planning Authority (CPA), that the works could take place as maintenance and would fall under Planning permission MO06/1294 dated May 2007. This planning permission was subject to conditions which provided control over the development.

Condition 5 states:

No operations or activities authorised or required by the permission shall be carried out, and no light except intermittent security or safety lighting within the site shall be illuminated, except between 0730 and 1800 hours Mondays to Fridays, and 0800 to 1300 hours Saturdays, and there shall be no working on Sundays or National or Bank Holidays.

As such, we would not have expected or accepted night time working, unless an emergency arose or health & safety event required attention. No mention of anticipation of night time work was made by you at Monday's site meeting to Alan Stones, Samantha Murphy or James Nolan. On Tuesday 17th January 2017 we received several communications from protestors, site neighbours and County and Local councillors about the night time work, with regard to noise and light and its impact upon them. As a result Samantha Murphy contacted you and your response explained the reasons for the works.

Since Condition 5 does not allow night time working, and your December 2016 submission to the CPA had made no reference to night time working, such works are deemed unacceptable. However, in order that we acted reasonably and expediently when considering enforcement action, we sought the views of the Health & Safety Executive (HSE) before further consideration of taking enforcement action.

The HSE have advised that whilst not an emergency situation, twenty-four hour operation would allow the well to be partially abandoned with a reduced risk of complications. Daylight hours only operations would require the well to be shut in during the night, which would be a risk, albeit low and in that situation the well being open could expose the workforce to additional hazards. The HSE stated that the focus of the Health & Safety Executive in this case is the safety of the workforce and the completion of well operations in a safe and efficient manner. As such, it is their opinion that the well would be better served by continuous operations until the abandonment cement plug has been set and tested.

As such, the CPA will allow the 24-Hr works to continue for a further 6-days (*until 25th January 2017*), but will require daily email updates as to precisely what operations have been carried out in relation to the abandoning & sealing of the well; and the logging of data from the well and why for

those night time activities are necessary. If for any reason an extension of the 24-Hr working is required, then please advise us immediately.

We would also remind you of the need to ensure that *noise emissions should be kept within the noise limits and that the lighting should be the minimal required whilst not compromising safe working.*

2/. We have also had reports of out of hours activities and have seen footage of a security vehicle and HGV being moved from site, purportedly at 8.43pm on Friday 13th January 2017. This is publicly available to view on Facebook using the following link.

<https://www.facebook.com/BrockhamProtectionCamp/posts/367256140297622>

Both you and your security manager have confirmed that such a movement took place, but believe it acceptable as the HGV did not leave the site. I would bring to your attention the following condition.

Planning Permission - MO06/1294 dated May 2007:

Condition 7:

Except for the case of emergency, no commercial vehicles shall enter or leave the site except between the hours of 0700-0800, 0900-1530, or 1800-1900, on Monday to Friday, and 0800-1300 on Saturday.

Whilst we accept that the HGV was simply moved from the site compound to the farmers yard to enable ease of egress the following morning, and did not leave the site, we do consider the internal movement of HGVs and any other equipment within the site as an operation. Such movements should not therefore be taking place after 19.00 Monday to Friday. As such, please ensure that the condition is complied with in the future.

I would be grateful to receive your written confirmation that Condition 7 will be fully complied with, and if HGVs need to move in the way you did, please ensure that it is done by 19.00 hours.

3/. Please reiterate to all those working at the site, be they on the rig or as security, that they must use the prescribed access route as referred to in the following condition.

Condition 6:

All vehicles entering or leaving the site shall follow the route shown on drawing entitled 'Figure No. 1' approved under planning permission MO92/0969 and attached to the legal agreement dated 9 January 1995.

4/. It would be very helpful if Angus Energy would consider circulating a short update statement to the local community.

5/. I would be grateful to receive a copy of the remaining schedule of works required under the workover programme, including which operations will be taking place between 18.00 and 8.00am.

I look forward to receiving your earliest response and thank you for your assistance on this matter.

Regards, Ian
Ian Gray - Team Leader Planning Enforcement

Environment & Infrastructure
Surrey County Council

Contact details

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