EIA for Multiple s73 Planning Applications

A recent EIA relating to the Wytch Farm, Wareham and Kimmeridge Oilfields in Dorset presented many challenges. Alison Carroll from Nicholas Pearson Associates reflects on some of those.

In 2011/12, Nicholas Pearson Associates coordinated the EIA for a proposal to extend the planning consents relating to the Wytch Farm, Wareham and Kimmeridge Oilfields.

At the outset, a few fundamental questions had to be answered.

1. What planning consents were required?

The planning history of the oilfields is extremely long and complex. The Kimmeridge Oilfield, for instance, was first discovered back in 1959. The Oilfields have been developed incrementally since then.

By 2011, when Perenco UK Ltd took over as operator of the oilfields, there were over fifty ‘live’ planning consents relating to the three oilfields. These covered a range of sites: a gathering station, access road, offices, sea water pumping station, causeway, twelve wellsites and numerous infield pipelines.

The majority of consents included a planning condition requiring restoration to be completed in 2016, although some ended in 2019 or 2020, and some were not time limited at all. In the end it was established that thirty nine planning applications would need to be submitted under section 37 of the Town and Country Planning Act 1990 (as amended). Thirty five planning applications would seek extensions to 2037, two to 2032 and two to 2027.

2. Was EIA required?

Yes! Whilst many of the individual planning applications could have been subject to screening and would not have exceeded any EIA thresholds, it was quite clear that collectively they sought to extend the operation of all three oilfields by over 20 years. The potential for this to give rise to significant environmental effects was clear, especially given that the oilfields are located within a very environmentally sensitive area. Collectively the sites fall either within or adjacent to an AONB, Heritage Coast, World Heritage Site and several Special Areas of Conservation, Special Protection Areas, Ramsar sites and Sites of Special Scientific Interest.

3. What would the scope of the EIA be?

It was clear that the scope of the EIA would necessarily be broad ranging, both geographically and in terms of topic areas. The EIA could not, however, just consider those elements that were subject to the thirty nine planning applications but had to consider the impacts of the whole development as extended. The EIA also included consideration of the Purbeck to Southampton Pipeline, which was not subject to consent from the Mineral Planning Authority and did not require a time extension.
The EIA also had to consider impacts against two different baselines:

- The conditions present in 2011 with all sites operating as they did at that time;
- The conditions that, based on available restoration proposals, could have prevailed in the future had the sites been restored in 2016. For ease, a 2016 end-point was adopted for all sites.

It soon became clear that if only the existing baseline was used then the impacts of retaining the sites would be negligible. All of the sites were already in place and operating. There were no plans to physically extend the sites or do anything radically different within them – in the future it was largely going to be ‘business as usual’. Assessing against the existing baseline would miss the fact that the proposals delayed restoration to heathland, woodland or agriculture and maintained hydrocarbon extraction and processing over the extended period.

Establishing the 2011 baseline was the easy bit. The real challenge was to work out what might have happened post-2016 if the oilfield consents were not extended.

4. How would the ES be structured?

ESs are often criticised for their length and unwieldy nature, but how could a concise ES be written to cover all of the sites, access roads and pipelines and meet the requirements of 39 separate planning applications? The honest answer is that it couldn’t be that concise! I do, however, think the ES was structured as logically as it could have been. One overarching volume was produced which provided an overview of all of the impacts cumulatively across the development. Seventeen additional volumes of varying length then acted as ‘mini-ESs’ for each location individually.

It has to be said that this has been my most challenging ES to coordinate to date and an experience that I have learned a great deal from. Some of the lessons learned from the process will be subject to a future article.

This article was written as a contribution to the EIA Quality Mark’s commitment to improving EIA practice. Alison Carroll is an Associate Environmental Planner at Nicholas Pearson Associates, a Full Member of IEMA, Chartered Environmentalist and Registered EIA Practitioner. The input of the client and all of the consultants who contributed to the ES is acknowledged, including Savills who are also Quality Mark registrants.