

Sussex Wildlife Trust

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Response sent via email, no hard copy will follow.

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11/07/2013

Dear Mr Wick

EA/EPR/AB3307XD/A001

Permit application from Cuadrilla Limited at their Lower Stumble Hydrocarbon Exploration Site

The following comments are made on behalf of the Sussex Wildlife Trust in response to the above application for an environmental permit. They are based on information associated with the proposal and our own knowledge of the ecology of the area. We have not undertaken a site visit.

1) Do you have any comments on Cuadrilla Balcombe Limited proposals to prevent or minimise emissions (including noise and odour) from the activity?

In the submitted Environmental Risk Assessment, Cuadrilla suggests that the trees surrounding the drill site will be used as a buffer to reduce some of the risks associated with the drilling activity. As much of the area surrounding the site is ancient woodland, we are not confident that due consideration has been given to the potential impact of drilling activities on the wildlife and ecology found within this buffer area.

2) Do you have comments on Cuadrilla Balcombe Limited proposals to demonstrate that the activity will not cause harm to the environment?

The Sussex Wildlife Trust would like to draw the Environment Agency's attention to the ecological survey submitted with the associated planning application in 2010. The survey for this report was undertaken in July 2009 and we have been unable to establish whether more recent survey work of the area has been undertaken.

We would like to stress that this decision should be based on up to date sound ecological data. We are concerned that the ecological information provided with this application is too limited to allow an informed decision on the ecological impact of this proposal to be made.

In particular we have concerns that the following activities may impact on the biodiversity of the area, including the surrounding ancient woodland.

- Flaring of waste gas – noise, light and emissions.
- Transportation of liquids and waste materials.

Taking Care of Sussex

President: David Streeter MBE
Chairman: Chris Warne
Chief Executive: Tony Whitbread

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3) Do you have any comments on Cuadrilla Balcombe Limited proposals to demonstrate that the activity will not cause harm to human health?

No comments.

4) Do you have any comments about any local factors, e.g. local sensitive environmental features, that Cuadrilla Balcombe Limited have not considered in the permit application, which you believe we should take into account?

We have concerns about the impact of the proposed activities on two local sensitive environmental features in particular; ancient woodland and the seasonal stream that runs to the south east of the access road.

Ancient woodland – Ancient Woodland is an irreplaceable resource of great importance for its wildlife, its history and the contribution it makes to our diverse landscapes. Public bodies have a vital role in ensuring its conservation. Due to the rich nature of this habitat we suggest that due consideration is given to the potential impacts from emissions and other activities associated with this proposal. Without up to date ecological information, we question whether the potential impacts of this proposal on species that could be present in the ancient woodland e.g. bats and lichen can be robustly assess.

Seasonal Stream – The Sussex Wildlife Trust notes that the Environmental Risk Assessment does not acknowledge the risk of contamination to the stream adjacent to the access track, associated with the transportation of waste materials and liquids. Given the streams connectivity to the River Ouse catchment we feel this should be addressed.

5) Do you have any comments on Cuadrilla Balcombe Limited proposals about the necessary measures that will be taken to prevent accidents and limit their consequences?

We would highlight that references to biodiversity in the mitigation comments are limited. We would like to see more regard given to the potential impact on biodiversity from this proposal.

6) Please tell us of any other information that you believe we should take into account when reaching our decision.

The Sussex Wildlife Trust is keen to see the precautionary principle applied in this case and assurances that all decisions are based on up to date sound environmental evidence, including up to date ecological data.

We also take this opportunity to remind you of your duties as a public body under section 40 of the NERC Act 2006

‘Every public body, must , in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity’

Yours sincerely

Janyis Watson
Head of Conservation