

Comment for planning application WSCC/045/20

Application number	WSCC/045/20
Name	Charles Metcalfe
Address	OLD INN HOUSE, LONDON ROAD, LONDON ROAD, HAYWARDS HEATH, RH17 6JQ
Type of Comment	Objection
Comments	<p>The only significant change to the 2020 application from the 2019 one has been the shortening of the timescale for the flow-testing, from up to three years to times variously estimated in the application as 12 months to 30 months. The procedures remain the same, with attendant risks to the water environment (not addressed by the 2020 AE application after the questions raised by a survey by a respected hydrologist in 2019) and air quality. The change to the economic situation has been an ever-increasing move from fossil fuels towards renewable energy, in line with the UK's declared adherence to the Paris Agreement of 2016. This is in line with the UK Government's commitment to a carbon-free economy by 2050. Renewable energy now accounts for 28% of generated energy, up from 18% in 2014. So, although oil remains part of the UK's fuel mix, it is an ever diminishing one. In addition, the recession caused by COVID has lessened the demand for energy. This has had the side-effect of lowering the price of oil. A barrel of Brent Crude oil currently trades for around \$42, down from \$60 in January. AE have suggested in their application (Planning Statement 1.6.2) that Lower Stumble 'has been associated with the exploration for and appraisal of hydrocarbons for over thirty years'. Unfortunately, they had already contradicted this in the preceding paragraph (1.6.1), where they said, quite correctly, 'In 1987, planning permission was granted for the retention of the borehole site for forestry storage in connection to wider activities on the Balcombe Estate. The site continued to be used as forestry storage for the Balcombe Estate up until July 2013.' Hardly 'exploration and assessment of hydrocarbons for over 30 years'. The reason for this reversion from oil exploration to forest storage? Conoco, the previous prospector, had decided they would never make money from the oil at Lower Stumble. Current circumstances suggest this is still the case. UK Oil & Gas, operator of nearby oil-well at Horse Hill (just into Surrey, but with the same underlying geological formations as Lower Stumble), has recently reported that the amount of oil has already declined 25% from its peak in April 2020. Production only started in March 2020. So this speedy decline in production in Horse Hill (nicknamed 'The Gatwick Gusher' by optimistic investors) does not suggest AE will have better luck at Lower Stumble. This is probably the reason for the fall in AE's share price, from a high of over 30p per share, to less than 1p. Returning to the recommendation by WSCC planners to refuse the 2019 AE application, there is even less reason to believe that there is any special need for the AE 2020 Lower Stumble application to be granted. The situation regarding the site's position in an Area of Outstanding Natural Beauty has not changed. 'The proposed development would represent major development in the High Weald Area of Outstanding Natural Beauty, for which there are no exceptional circumstances, and which is not in the public interest.' Following on from this, 'There are alternative sources of hydrocarbon supply, both indigenous and imported, to meet the national need, there would be minimal benefit to the local economy from the development, and there is scope for meeting the need in some other way, outside of nationally designated landscapes.' There remain risks to water quality, of air pollution, of increased HGV traffic (passing 3 metres from Balcombe primary school), to wildlife and the environment. This application brings no benefit to the local community and makes a negligible contribution to the national economy. There is no reason it should be allowed in an Area of Outstanding Natural Beauty. Please refuse the application.</p>
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Attachments	