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**Sent:** 25 February 2021 13:46

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**Subject:** Objection to planning application WSCC/045/20 in response to the Officer's Report

This objection to planning application WSCC/045/20 which is being considered at next Tuesday's planning meeting is being sent to all members of the Committee and substitutes and the Officers.

**The Weald Action Group does not agree with the OR that this development should be permitted. We specifically disagree with the report's findings that:**

1. there is a national need for the development; and
2. that the proposal meets the criteria set out in paragraph 172 of the [NPPE](#) for allowing a 'major development' within an AONB (specifically those criteria on national need, local

economy benefits, and meeting the need for the development in some other way).

As such it does not appear that there are exceptional circumstances or that this development is in the public interest. We submit that it should not be permitted.

The detailed objection is attached.

Thank you for considering it.

Best wishes

Ann Stewart, Emily Mott and Dr Jill Sutcliffe on behalf of the Weald Action Group

Ann Stewart: [REDACTED]

Emily Mott: [REDACTED]

Dr Jill Sutcliffe: [REDACTED]



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## Response from Weald Action Group to the Officers Report regarding application no. WSCC/045/20

**We do not agree with the OR that this development should be permitted. We specifically disagree with the report's findings that:**

1. there is a national need for the development; and
2. that the proposal meets the criteria set out in paragraph 172 of the [NPPF](#) for allowing a 'major development' within an AONB (specifically those criteria on national need, local economy benefits, and meeting the need for the development in some other way).

As such we do not consider that there are exceptional circumstances or that this development is in the public interest and as such it should not be permitted.

Our objections are elaborated on below.

### **Need for the development (paragraphs 9.2 to 9.11 of the OR)**

- There is no need for new onshore oil exploration to contribute to meeting national energy security and supply. The arguments are complex but the data and changing policy environment means that the Officer's conclusion that "*there is a need for the development to contribute to national energy security and supply*" is far too simplistic and wrong.
- The key points (which are further elaborated on [here](#)) are:
  - In terms of energy security, the UK compares well with OECD countries for self-sufficiency in oil and diversity and political stability of oil imports.
  - The UK has been a net importer of oil since 2006 and while the overall trend in domestic oil production is indeed downwards, in recent years production has actually increased.
  - In the UK the demand for oil has been falling for over 20 years and mitigating climate change means we must actively manage demand to stay within carbon budgets. Delivering on its climate change commitments will require the Government to put in place policies that speed up the reduction in demand, **such that by 2050 oil demand could have fallen to less than a sixth of its present level.**
  - Although domestic oil production is expected to fall over the next 30 years, given the falling demand for oil and the climate imperative for this to continue, net imports may also be put on a downward trajectory over this timeframe.
- National energy policy is also shifting.
  - The removal of paragraph 209(a) from the NPPF means that Mineral Planning Authorities no longer need to specifically recognise the benefits of onshore oil and gas developments for energy security or in supporting the transition to a low carbon economy.
  - The language contained within the [2020 Energy White Paper](#) (EWP) marks a significant shift from the last EWP published in 2007, putting efforts to fight climate change and a decisive shift away from fossil fuels at its core. This is not adequately recognised in the OR which narrowly quotes from the EWP's oil and gas chapter (paragraph 9.9 in the OR). This is misleading as the EWP largely focuses on the offshore oil and gas sector (and mentions the onshore sector only once). Indeed, it is the offshore oil and gas sector which is a significant contributor to the UK economy (with the onshore sector playing a very minor role).
  - The Government have also confirmed, in their new EWP, that they are reviewing their old Energy National Policy statements which are no longer a reflection of the world we live in today.

### **Major Development (paragraphs 9.12 to 9.30)**

- We agree with the OR that this proposal is ‘major development’ within an AONB. As stated in paragraph 172 of the NPPF it should be “*refused other than in exceptional circumstances, and where it can be demonstrated to be in the public interest*”.
- Paragraph 172 of the NPPF goes on to say: “*Consideration of such applications should include an assessment of: a) the **need for the development**, including in terms of any national considerations, and the impact of permitting it, or refusing it, **upon the local economy**; b) the cost of, and scope for, developing outside the designated area, or **meeting the need for it in some other way**; and c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*”
- The first section of this response lays out our arguments as to why we do not consider that the ‘need’ test has been met with regards to national considerations.
- **With regards to assessing need in terms of the impact the development may have on the local economy the [socio-economic report](#) submitted with the planning application is inadequate.** It predominantly focuses on establishing applicable national, regional and local policies. Only 3 pages of this 38-page report are dedicated to providing estimates of the potential economic impacts of the development on the local economy. The report estimates, in section 6.3, that “*the site will spend approximately £1,709,000 per annum on 3rd party goods and services sourced predominantly from other local businesses*”. However, the OR notes that “*Having queried this figure, it has now been refined down to £815,000 potentially locally sourced*” – a reduction of more than 50%. This raises significant questions as to the robustness of the assessment made. Indeed, no detail is given or methodology provided as to how economic impacts were estimated in the report.
- In addition, we do not consider £815,000 to be a substantial enough sum which would meet the exceptional circumstances needed for this development to meet approval criteria.
- **The OR does not fully assess whether the ‘need’ for oil can be met in some other way as prescribed in paragraph 172b of the NPPF.** If the ‘need’ can be met by existing supply (because the demand for oil is falling so there is no gap to fill), or by new supply elsewhere (e.g. the recently permitted site at Horse Hill in Surrey) or in another way (e.g. by renewable energy) then the development does not pass the test\*. This more holistic assessment is not made in the OR and, as the major development test bar is so high, it must be carried out in order to fulfil the requirements of the NPPF and to establish “exceptional circumstances” and “public interest”. This failure to assess properly the alternatives to this development are a clear reason for refusal.  
\* Indeed, even under its more limited assessment paragraph 9.27 of the OR states “*There are also alternative sources of indigenous and imported hydrocarbon supply that could meet the national need for hydrocarbons*”.
- The quest for alternatives should not be limited to a quest by the applicant for another site in the PEDL area. This is not the test in the NPPF or the West Sussex Minerals Plan.
- No evidence is given to support the claim made in paragraph 9.28 of the OR which states “*the potential to develop on-shore oil reserves has been seen increasingly important nationally in order to provide greater diversity and security of supply*”. Indeed, the Government’s 2020 [Energy White Paper](#) makes only one reference to onshore oil and gas within its 170 pages.