
From: John Butcher [REDACTED]
Sent: 23 February 2021 23:05
To: Richard Burrett <richard.burrett@westsussex.gov.uk>
Subject: Planning Application Number WSCC/045/20

Re: Application Number WSCC/045/20, Proposal to Remove drilling fluids and carry out an extended well test at Lower Stumble Exploration Site, off London Road, Balcombe, Haywards Heath RH17 6JH.

Dear Councillor Burrett

“Tackling climate change is the one of the most urgent shared endeavours of our lifetimes, demanding bold action from every nation to prevent catastrophic global warming”- UK Business and Energy Secretary and COP26 President Alok Sharma, 4th December 2020.

Saying “no” and rejecting this planning application in the planning meeting on 2nd March 2021 is the type of bold action required.

There are so many strong reasons to reject this application WSCC/045/20 and so few tenuous ones in favour of it.

I am writing to highlight 3 major reasons to vote “no” and reject this application:

1. Misstated business rate benefits
2. Overstated local economy benefits
3. Failure to meet the triple balanced objective National Planning Policy

Framework 2019 on Sustainable Development (economic, social and environmental)

1. **Misstated business rate benefits:** In the application's Socio Economic Report the statement that "Potential local business rate investment of between region of £40,000 - £60,000 per annum" is a misleading benefit that should be ignored and removed from assessment criteria because, that £ value "is a potential based on an assumption the site moves from exploration to production" (source, Angus Energy written correspondence from Nick Mace to Chris Bartlett 14.12.20). While other normal business rates are paid during exploration, this elevated rate is based on a prediction from Angus in the region of £40,000 - £60,000 per annum conditional on the subsequent production application were to be approved. However, the production phase cost, risks, issues, process and benefits should be part of a subsequent and separate application and not part of this one.

2. **Overstated local economy benefits:** The vast majority of the £800,000 alleged local economic benefit would not benefit the local economy and is really likely to only be £80,000. Firstly, the majority of what is being purchased are physical goods that have raw materials and part sourced from outside the local area, likely outside the UK, such as the cabling from abroad. While the cost to Angus might be £800,000 on those items, c 80% would go straight out of the region as pass-through costs. High labour services is the exception, such as security personnel. Secondly, there is not a substantial enough supply market for all of these items locally. There are hotels, but not sufficient capacity and qualified capability in other key areas such as the consulting and security services. These two factors combined means there would only likely be around £80,000 for retained local profit benefit.

3. **Failure to meet the triple balanced objective National Planning Policy Framework 2019 on Sustainable Development (economic, social and environmental):** This application fails the triple objective test of the National Planning Policy Framework 2019 on Sustainable Development. That Framework sets out the Government's planning policies for England and is a material planning consideration in the determination of planning applications.

Sustainable Development Paragraph 7 states that "*the purpose of the planning system is to contribute to the achievement of sustainable development*", which requires three objectives to be met in Economic, Social and Environmental terms. "*Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives).*" Sustainable development should thus

not be undertaken in isolation, because they are interdependent and need to be pursued in mutually supportive ways to secure net gains across those three different objectives: Economic, Social and Environmental.

a. The economic benefits are vastly overstated in this application and could be achieved in other less environmentally and socially damaging ways.

b. The *social* objective "supporting strong, vibrant and healthy communities" is being shattered by this application because the community that was once so social and cohesive has been bitterly diverted, less healthy and weakened since this oil exploration restarted in 2012.

c. The *environmental* objective of "contributing to protecting and enhancing the natural, built and historic environment" is also undermined because it will further contribute to atmospheric pollution (particulate matter, noise and greenhouse gas emissions) that are issues locally and globally, hence not supported by this application.

There is also only a tiny volume expected (1599 barrel / day) that would make no significant impact on foreign oil import levels).

Therefore, there is no exceptional circumstance or strategic imperative to support this application,

Indeed, there is exceptional circumstance for refusing this application - our climate emergency, declared by our UK government in 2019.

Sincerely

Mr John Butcher

Balcombe Resident,
