

KEEP Kirdford and Wisborough 'Green'

UKOG applications for Broadford Bridge drilling site

WSCC/001/22

Wood Barn Farm, Adversane Lane, Broadford Bridge,
Billingshurst, West Sussex, RH14 9ED

Amendment of condition no. 1 of planning permission
WSCC/078/19/WC to enable the retention of security fencing,
gates and cabins for a further 24 months

WSCC/002/22

Wood Barn Farm, Adversane Lane, Broadford Bridge,
Billingshurst, West Sussex, RH14 9ED

Amendment of condition no. 1 of planning permission
WSCC/079/19/WC extending the permission by 24 months to
enable the completion of phase 4 site retention and restoration

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This is an application originally made in 2016 with the intention of finishing in 2019.....As you will see from the statements made to the WSCC Planning Committee this drilling well never worked, quite possibly spilled its contents and chemicals used into the surrounding heavily faulted area and was shut down and taken away in March 2019 so why is UKOG seeking to retain an unworkable site? They have had enough time in which to assess the operation of this failed well; and should pack up and restore the site.

We OBJECT to these applications

Many things have changed since this application was first made. This is now the age of the Climate Emergency (as declared by the UK government) and of the Biodiversity Emergency (declared by IPBES, May 2019); the latest UN report pointed to Climate breakdown accelerating rapidly, many of the impacts will be more severe than predicted and there is only a narrow chance left of avoiding its worst ravages.

Even at current levels, human actions in heating the climate are causing dangerous and widespread disruption, threatening devastation to swathes of the natural world and rendering many areas unliveable, according to the landmark report published on Monday February 28th, 2022.

Our objection takes account of

- Incompatibility with the Government's Environment POLICY 25 Year Environment Plan, 'A Green Future: Our 25 Year Plan to Improve the Environment', sets out what the government will do to improve the environment, within a generation.
This application does not conform with this policy.
- WSCC Minerals Plan's strategic objectives. KKWG has nothing to add to what we have said in our earlier and detailed representations. We stand by those submissions
- Relevant environmental regulatory requirements and technical standards.
- Policy adopted since 2016 including the National Planning Policy Framework, July 2021

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- While UKOG states that they have no intention of drilling, on 12th February 2022 Government Minister Zak Goldsmith said

“To replace half the gas we import, we’d likely need around 6,000 new wells, with all the associated industrial equipment & endless movements of trucks ferrying toxic chemicals and wastewater to and from sites. It’s hard to imagine communities across the UK being ok with that. It’s hard to overstate just how unpopular fracking is with the British public. The last BEIS attitude tracker showed only 18% support (76% supported onshore wind). People do not want large-scale industrialisation of the British countryside. And given the gas would be produced by private firms and sold at the highest price (internationally), there would likely be no measurable impact on UK gas prices anyway”.

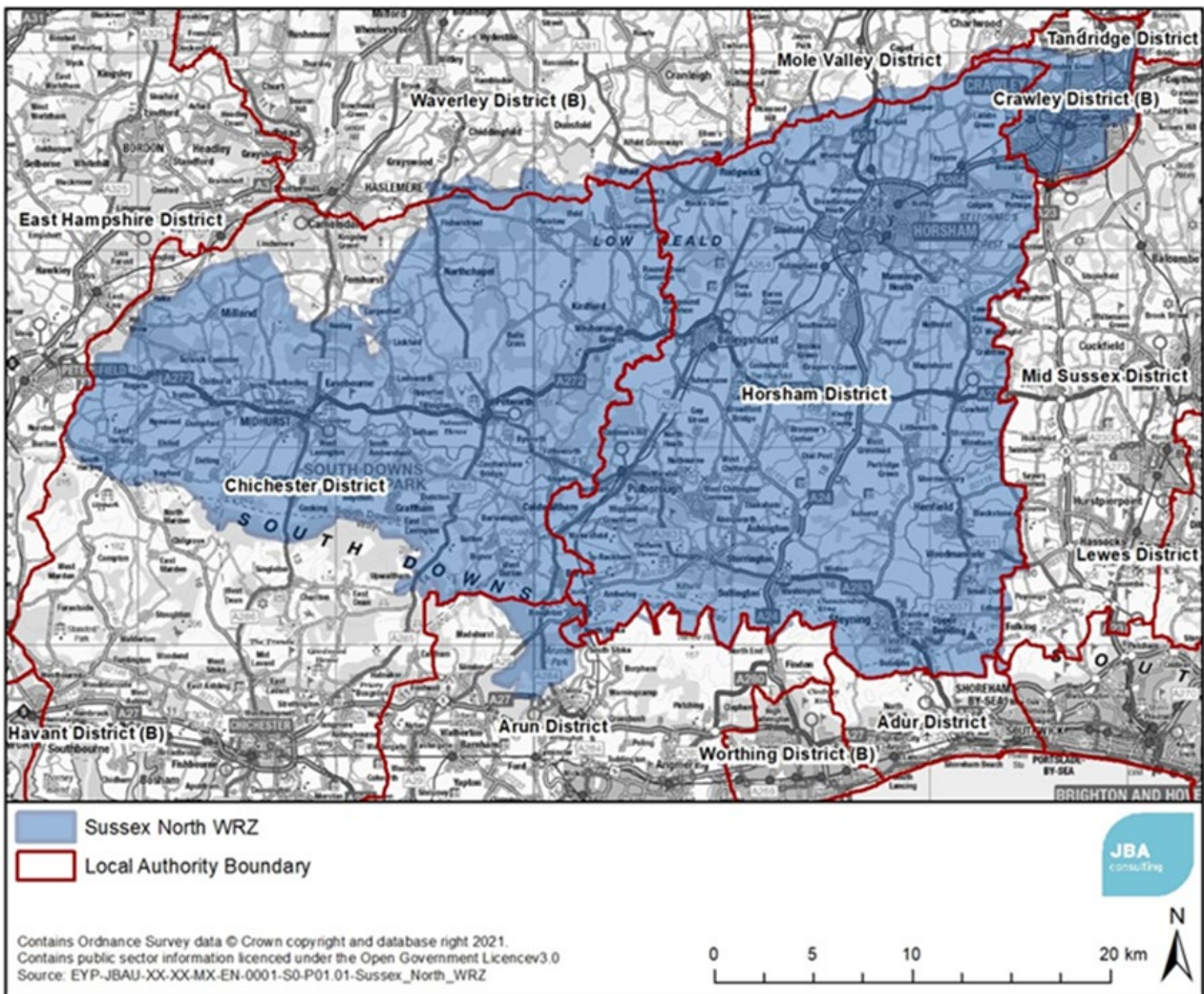
- No **Biodiversity Net Gain** has been suggested and that becomes a legal requirement in September 2023 and the issues raised: - See Article: zu Ermgassen, S.O.E., Marsh, S., Ryland, K., Church, E., Marsh, R., Bull, J. W. (2021). Exploring the ecological outcomes of mandatory biodiversity net gain using evidence from early-adopter jurisdictions in England. *Conservation Letters*. 14:e12820. <https://doi.org/10.1111/conl.12820>

- The shape and use of the land around the site in terms of its potential impact, whether that impact is acceptable and what pollution control or abatement may be required.

- This current application should have provided a detailed analysis of the impacts that the operation has had to date.

And a new consideration is that of water which is now restricted in the area

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- Infrastructure** – The application has not addressed a significant infrastructure issue which is that of a lack of a suitable sustainable supply of water in this area and an additional potential threat to the Upper Arun Special Protection Area which has been highlighted by Natural England, NE.
 - Southern Water announced that in the Sussex North Water Supply Zone they might not be able to supply water to the 4 Parish Councils in the North of Chichester District and in Horsham DC. This has led to a current halt to planning proposals and to the suspension of the Loxwood NP. See map below.
 - Omissions:** the carbon footprint of the development has not been assessed and there is now a UK commitment to Net Zero.
- This operation has run out of time and the applications should be **REFUSED**.

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APPENDIX 1:

Broadford Bridge – statements made to WSCC Planning Committee by KKWG with respect to earlier applications for more time.

*Dedicated to the late Professor Stephen Hawking,
"We Are Close to Tipping Point Where Global Warming Becomes
irreversible"*

Introduction:

Good afternoon Cllrs. My name is JILL SUTCLIFFE, I live in WISBOROUGH GREEN, have served on the Parish Council and lived in West Sussex for 30 yrs.

I am an environmental scientist who worked for the Government advisory body, Natural England. What concerns me are the information gaps and I intend to focus on 3 issues:

- The company's plans
- Invisible harms, and
- Restoration plans

Sept 2018: Presentation to WSCC Planning Committee for 2nd UKOG application for Extension of time at Broadford Bridge:

Four years ago (July, 2014) I attended this meeting when you turned down the Celtique Energie (now re-named KOG and a UKOG subsidiary) application for an Exploratory drill on land to the south of Boxal Bridge and, I'd like to thank you for that decision. Having now seen what has happened at Broadford Bridge I am doubly glad and urge you to also turn down these applications which would amount to an almost 40 % increase ie from 49 to 67 months.

Kimmeridge Oil & Gas Ltd, KOG, plans:

1. **Three times we have been told that the site will be restored** - originally by the company : "The site is restored

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if no oil or gas is discovered, [and takes] 6 weeks," a point repeated by Stuart Catterall, then company Chief Operating Officer at the Planning decision meeting, "*If nothing was found the site would be remediated.*" And, in last year's Planning Officer's report: "If the tests show that there is not a viable hydrocarbon resource, the well would be 'abandoned' by plugging the borehole and the site restored."

2. The independent *Contrarian Investor* (Feb, 2018) commented "*Low reservoir productivity indicates zone likely not economically viable.*".....and "*Apparently BB-1-z was now not in the "sweet spot"!*"
3. UKOG reported in March "*Flow rates....are likely sub commercial*" leading to independent industry commentators stating that nothing had been found. So I suggest restoration should commence now on Sept 15th as per your Condition 1.

KOGL Planning Application:

4. The Planning Application for the proposed extension states that it is for the Exploratory phase, not the Appraisal phase and,
5. Continues: "*Testing phases of the work are now complete*"... "*testing completed March 2018,...*" it has become clear that the data required to complete the review process will not be available within the consented timeframe." So, the company has already assessed what they found by drilling... why then this application for more time?
6. Two issues: What data? Surely this is the Appraisal phase? And, the application refers to other sites in the Weald which are not within WSCC jurisdiction and thus cannot and should not be a consideration in the current application. See Planning Officer's report (top of p 98).

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7. At the Markwells Wood site, NW of Chichester in the South Downs National Park, UKOG (same company) has been served with a Breach of Condition notice after failing for 2 years to restore that site. Can we rely on their claims that they will restore the site at Broadford Bridge?

History:

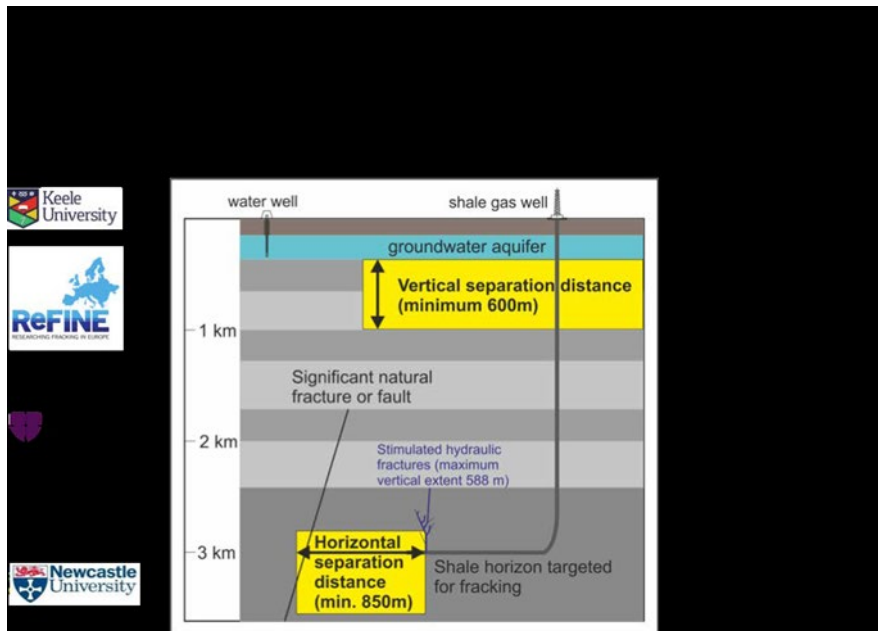
8. Well failed: The operation of the drilling well was flawed. The cement bonding failed, ie a failure of well integrity, and it is quite possible that the liquids including chemicals put down the well got out and are somewhere underground. It was reported (*RNS Number 6747N*, UKOG PLC, 10 August 2017) that the original well developed a washout zone, where drilling fluid was lost.

Additional information:

9. Horsham District Council stated "The District Council would have concerns with the longer term retention of this development as it would be detrimental to the landscape character of this countryside location." This does not appear to be recorded in the Planning Officer's report.
10. **Invisible harms: Air pollution, Water pollution and Geological** structure all present potential unseen harms. The latter plus site restoration are the responsibilities of the Mineral Planning Authority (NPPF, 2018). New research demonstrates that a minimum horizontal distance of 850ms needs to exist between a fault and any drill site. This is NOT the case at Broadford Bridge which was drilled through a fault line. Such faults can move at any time as shown by a nearby earthquake recorded in 2005 by the British Geological Survey. There is no technology available which can predict this.

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Fig 1: Horizontal buffer zone and vertical separation distance Prof Peter Styles , 2018



Summary:

1. Original permission stated the site must be restored if **no oil/gas found**
2. KOGL/UKOG have stated no oil/gas found
3. Permission was for Exploration stage only and the company stated that this ended March 2018.
4. UKOG is already under enforcement action for repeatedly failing to restore the Markwells Wood site.
5. Key facts missed from officer's report and thus committee not being presented with all relevant information.
6. Officer's report also contains data/references to sites outside of WS which are immaterial to this application.

REFERENCES:

1. Celtique Energy information display boards, Billingshurst Community Centre, June 22-23, 2012
2. Stuart Catterall, Chief Operating Officer at Celtique Energie, WSCC Minutes Planning committee meeting, 5/2/2013, Para 124
3. Planning Officer's report, 12/9/2017

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4. *UKOG Regulatory News Service, 29th March, 2018, Update Broadford Bridge; and, RNS No 3220J; End of year results, 2017, March 29th, 2018 Yr ended 31/12/2017, RNS-3788J*
5. *Site Restoration Plan 3261/BB/18 and WSCC Planning Committee meeting minutes, 15/9/2017*
6. *Contrarian Investor, UKOG update February 21st 2018 - More Broadford Bridge disappointment AIM oil and gas, UKOG, Weald Basin UK*
7. *KOGL Planning application via Planning Portal, 14/6/2018*
8. *WSCC Planning Officer's report, 2018 p98*
9. *SDNPA , South Downs Planning latest news, July 19th, 2018, UKOG Planning breach*

17 July 2018 Markwells Wood, Back Lane, Forestside, Rowlands Castle, PO9 6EB The following condition has not been complied with:

2. This permission shall be for a limited period only expiring on 31 September 2016 {sic}, by which date the operations hereby permitted shall have ceased, all buildings, plant and machinery, including foundations, hard standings shall have been removed from the site, and the site shall be restored in accordance with the approved restoration scheme.

10. *RNS No 6747N, 10/8/2017*
11. *Horsham DC, Planning Committee Agenda Item No. 4, 12 Sept, 2017 County Matter Mineral Application Amendment of condition no. 2 of planning permission WSCC/052/12/WC to allow for a further 12 months of continued operations to enable the completion of phase 3 testing and phase 4 restoration or retention*
12. *Peter Styles, Prof. Emeritus, Keele Univ, May 2018, Fracking and Historic Coal Mining: Their relationship and should they coincide? Report.*

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July 2020 Presentation to WSCC Planning Committee for 3rd UKOG application for Extension of time at Broadford Bridge:

This is the third time we meet concerning this temporary structure at the Broadford Bridge (oil) exploratory drilling site.

The drill was removed two years ago after the original well developed a washout zone where drilling fluid was lost . UKOG stated that the well produced little of "commercial value". So, no economic gain...and it didn't work so let's not retain it. And the company has repeatedly said that if they found nothing they would stop and restore the site. Their worst case scenario allocates 30 months for retention of which they've had 27 months so they should finish including that restoration of 6 weeks by October.

While the drill was working, harm was done. Above all, Adversane residents suffered from the enormous disruption Let's not burden Adversane again (PC Meeting July, 2019).

The company maintains that it "might" need to use the well to access/work with those at Horse Hill, Surrey....Too late, too late. Fossil Fuel companies need to stop and clear up the damage that has been created to the climate by their pollution and should pay according to the Polluter pays principle.

This time, Cllrs, the issue is PERSONAL – and by that I do not mean for you as people, I mean in your role of representing the residents of Sussex and extending to them a Duty of Care.

Climate change

- 1. IF the average increase in temperature exceeds 1.5°C - that could happen within the next 10 years - we**

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will start losing bits of the county to Sea Level Rise – Climping, West Wittering + Selsey on the Manhood Peninsula which form part of the “buffer zone” for Chichester . The independent Climate Change Committee reports indicate that the UK is not meeting its emissions targets. The UK Government Climate Emergency requires this county to support it to reach its targets and, there is a clear legal requirement, that local planning authorities (LPAs) must address climate change.

Financial failure

2. UKOG is in a precarious financial position – today the share price <1p. The county should consider establishing a bond. The NPPF, the rulebook for planning authorities, and ministerial written answers, make the MPA responsible for taking financial security for restoration "if they consider it necessary". You were advised last time that the MPA did not consider this to be necessary. Perhaps that view has changed?

Potential contamination

3. Given the well integrity failure, potential contamination could yet come to light. This is a real risk that the chemicals used in the drilling could have got into the environment, an issue flagged up by former EA staff member Graham Warren. The Weald is very faulted which could facilitate the movement of toxic liquids to places where they would not be wanted and, from which they could not then be removed (RNS ibid)

Sir James Bevan, CEO of the EA, 24 Oct, 2019 said:

"We need to mitigate the damage from climate change, by reducing or stopping the human activities which are causing it. We can do that..., by cutting our emissions of greenhouse gases."

[Climate scientists give society 10 years only in which to address this issue. The UK was a world leader with its

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Climate Change Act in 2008. We have failed to implement it and now we are lagging. We must do better.]

The applicant has stated repeatedly that if they found nothing they would stop and restore the site. They found nothing so they should go

Both the NPPF (Para 205e) and the Joint Minerals plan (of 2018) require restoration and aftercare "at the earliest opportunity".

Cllrs: There is no substitute for taking action. Refuse this unnecessary, untimely, application.

Thank you for your attention.