

Comment for planning application WSCC/046/23

Application number	WSCC/046/23
Name	Paul Steedman on behalf of
Address	CPRE Sussex, Sussex's countryside charity Brownings Farm Blackboys East Sussex TN22 5HG
Type of Comment	Objection
Comments	<p>Thank you for the opportunity to comment on this application. CPRE Sussex, the countryside charity for Sussex, objects to the application and asks that you refuse permission.</p> <p>The applicant has had a succession of applications to extend the period within which they have to discharge the original condition requiring site restoration by:</p> <ul style="list-style-type: none">- 12 months in 2017 (WSCC/052/12/WC)- a further 18 months in 2018 (WSCC/032/18/WC)- a further 24 months in 2019 (WSCC/079/19)- a further 24 months in 2022 (WSCC/002/22) <p>They are now asking for a further 24 months.</p> <p>While we would accept that sometimes delays happen, it seems extraordinary to us that the applicant has dragged its feet for so long on restoring the site and complying with the conditions of the original consent. If this application is granted, the applicant will not have to restore the site until 2025 when the original consent required completion within 3 years (i.e. by 2016).</p> <p>This is surely well beyond the reasonable intention of the relevant policies or the original consent; applicants cannot surely not be permitted a never-ending succession of delays to the discharge of original conditions, or it makes a mockery of the existence of the conditions in the first place. Granting this application would bring into question the credibility of planning conditions on a much wider scale.</p> <p>The applicant is clear that the onsite testing and appraisal itself has actually finished, but they claim they need more time to analyse data from two other sites in Surrey before they can make a decision about what to do with this site. That may be the case in terms of the applicant's commercial considerations, but it is surely unreasonable to expect this to weigh heavily in the planning balance when it comes to the restoration of this site.</p> <p>The WS Joint Minerals Local Plan says "As oil and gas development typically takes place over three stages (exploration, appraisal, and production), it is possible to require restoration to be undertaken at the end of each stage. This is important as it may be decided to abandon the well following the exploration and appraisal stage, as well as after production has finished."</p> <p>Policy M7a (Hydrocarbon development not involving hydraulic fracturing - Exploration and Appraisal) says that: "Proposals for exploration and appraisal for oil and gas, not involving hydraulic fracturing, including extensions to existing sites will be permitted provided that: ...restoration and aftercare of the site to a high-quality standard would take place in accordance with Policy M24 whether or not oil or gas is found"</p> <p>Policy M24 requires that plans "ensure that land is restored *at the earliest opportunity* including, where appropriate, by phased, or progressive restoration".</p> <p>After multiple time extensions, generously granted, the 'earliest possible opportunity' has surely now passed.</p> <p>This application must be refused, and the conditions relating to site restoration must be discharged. If this requires enforcement action, then this should be pursued.</p> <p>If, following their appraisal of the data from their other locations, they wish to pursue a different or further use of the Broadford Bridge site, then they can bring forward an application for that purpose. In the meantime they should meet their existing obligations.</p> <p>Thank you for considering our perspective. Yours sincerely Paul Steedman, Director, CPRE Sussex</p>
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