

# Comment for planning application WSCC/046/23

Application number

Name

Address

Type of Comment

Comments

Planning Policy Guidance  
National Planning Policy Framework (NPPF) which is the 'rulebook' for planning authorities when considering applications, Paragraph 217 (e) indicates that "restoration and aftercare" is required "at the earliest opportunity".  
'Achieving Sustainable Development' is the thread running throughout the NPPF and requires 'Social', 'Economic' and 'Environmental' considerations to be taken into account. Any hydrocarbon development at Broadford Bridge is NOT sustainable.

Earthquakes  
The Weald is heavily faulted and there are faults directly under the drill site. David Smythe discusses this at length in his Earthquake Report - Page 15.  
Prof Styles of Keele University advises that any unconventional drilling (fracking or acid stimulation) should only take place with a minimum of 850m from any faulted area.  
Research from Dr Robert Westaway (Senior Research Fellow in earthquake seismology) and other geologists have concluded that the Newdigate swarm of earthquakes were caused by UKOG drilling at Horse Hill due to the faults that exist around the Weald. At the time of the enquiry, Oil & Gas Authority (now North Sea Transition Authority) and British Geological Survey said the earthquakes were not caused by UKOG as they claimed they were not on site at the time. This was proved as a lie due to drone evidence and had to admit it later.

Climate change  
Predictions on the adverse effects of global warming are increasingly mounting, and any impact on climate change is a legitimate reason for local government authorities to refuse these types of applications. It is important to act responsibly now and stop hydrocarbon extraction and any impact from methane emissions in Sussex.

WSCC has issued their strategy on climate change, with commitments to net zero by 2030. How will they achieve this with further extensions to oil and gas sites just to see if they can drill for more hydrocarbons within 2 years?  
[https://www.westsussex.gov.uk/media/17325/climate\\_change\\_strategy\\_2020-2030.pdf](https://www.westsussex.gov.uk/media/17325/climate_change_strategy_2020-2030.pdf)

Local Area  
Potential contamination of water by acid and other chemicals used particularly in light of the well failure referred to in Jan 2024 newsletter.  
Adversane Lane has gained from the drill being removed and the lack of HGV traffic. That should continue as they suffered from increased noise, light and disruption from the site and HGVs, as well as the wear and tear on the roads. The original estimate of 22% increase in HGV traffic was found from the survey to be 68% as the heavy traffic was not using the Advisory Lorry Network route.

WSCC Planning Committee  
The planning committee needs reminding that the last time UKOG applied for an extension to retain their site at Broadford Bridge, some members of the council's planning committee questioned the need.

Speaking in 2018, Cllr Janet Duncton said if the company came back for a further extension, the committee would be "quite tough". In 2020 Cllr Simon Oakley asked how much weight should be given in the decision to the energy strategy and UKOG's reliance on data analysis at other sites. "My patience is wearing thin with this".

Geothermal  
UKOG's spurious plans to use the site for geothermal energy exploration has no relevance to this licence. Any plans for an additional borehole would require a separate planning application not an addition to the current one.  
It is also not clear if their 'plans' for converting the Broadford Bridge site to Geothermal Energy production involves the existing well on site.

Casing failure  
There are long term problems associated with using abandoned oil wells for geothermal energy.

Location Restricted  
The largest single disadvantage of geothermal energy is that it is location specific. Geothermal plants

need to be built in places where the energy is accessible, which means that some areas are not able to exploit this resource.

#### Environmental Side Effects

Although geothermal energy does not typically release greenhouse gases, there are many of these gases stored under the Earth's surface which are released into the atmosphere during digging. While these gases are also released into the atmosphere naturally, the rate increases near geothermal plants.

#### Earthquakes

Geothermal energy also runs the risk of triggering earthquakes, and The Weald is heavily faulted. This is due to alterations in the Earth's structure as a result of digging. This problem is more prevalent with enhanced geothermal power plants, which force water into the Earth's crust to open up fissures to greater exploitation of the resource.

#### High Costs

Geothermal energy is an expensive resource to tap into, with price tags ranging from around \$2-\$7 million for a plant with a 1 megawatt capacity. However, where the upfront costs are high, the outlay can be recouped as part of a long-term investment.

Corrosion of the casings during the life of the well renders the casing very fragile and unlikely to cope with the high temperatures associated with geothermal energy causing damage in the multimillion-dollar range.

#### Possible Environmental Pollution

Heating and cooling an old casing would develop compression and tensile stresses resulting in fractures and leaks which could result in environmental pollution

It would be necessary to provide new deep casings grouted into the impervious rock extending deeply into the old oil well to re-establish well integrity making any proposal less viable. Broadford Bridge wells failed!

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Attachments