

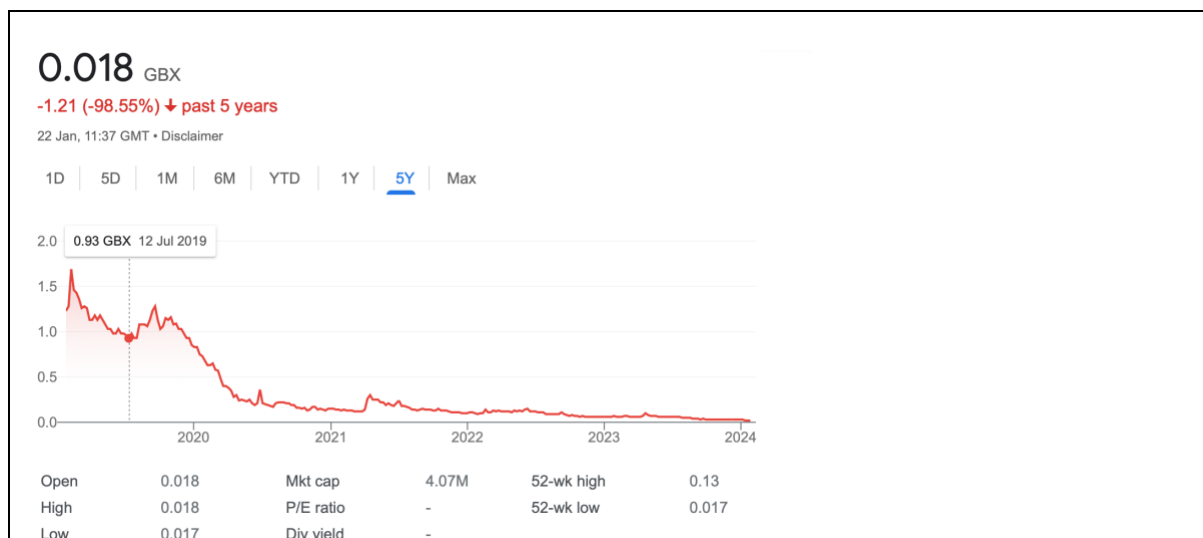
Comment for planning application WSCC/046/23

Application number	WSCC/046/23
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Type of Comment	Objection
Comments	Please see attached pdf document.
Received	24/01/2024 11:53:11
Attachments	The following files have been uploaded: Broadford Bridge 2024 objection.pdf

Planning application WSCC/046/23

I am writing to object to this application to extend planning permission at this site for a further 24 months. This is the fifth such application, even though the applicant stopped work at the site as long ago as 2017 because the site was found to be unproductive¹. It is my opinion that the applicant is repeatedly applying for extensions to avoid the expense of restoration. This makes a mockery of statements in the WSCC minerals plans that specifies restoration “at the earliest opportunity”.

I am also concerned that the applicant may soon not have the reserves to pay for the restoration required by the original planning permission and that, in time, the costs may have to be met by my local authority. This company has a history of financial losses, partly because their projects have failed to deliver on their exaggerated promises. My personal experience of this is Markwells Wood² where the company predicted a million barrels of recoverable oil, only to withdraw their application, probably because objections from both Portsmouth Water and the Environment Agency that disputed their assessment on the effects on the local aquifer. Original projections of billions of barrels of oil at Horse Hill in Surrey³ have been far from realized⁴ and further exploration work, for which permissions have already been granted, has now been farmed out to another company⁵. **I urge the planners to insist on restoration while the company is still in a position to pay the costs.** I enclose a screen shot of their share history over the last five years.



In support of their application for a time extension the applicant proposes future plans to use heat from the site for commercial fruit and vegetable production, and even tea

¹ https://drillordrop.com/2017/12/27/ukog-broadford-bridge-update-unproductive-section-plans-for-new-sites-extended-flow-test-consent-and-new-analysis/?utm_source=General+Mailout&utm_campaign=48138256fd-EMAIL_CAMPAIGN_2017_05_25_COPY_01&utm_medium=email&utm_term=0_6c071d9784-48138256fd-237378093

² <https://www.energyvoice.com/oilandgas/87579/uk-oil-gas-in-positive-estimate-of-markwells-oil-field-resources/>

⁴ <https://drillordrop.com/2023/10/03/uk-onshore-oil-and-gas-production-in-charts-july-2023/?fbclid=IwAR22HOleRslT6oR75yHU36ByyjGqh-0hDVQ8S18SYFItXcQphUIXnNFdmRI>

⁵ <https://drillordrop.com/2023/03/28/ukog-announces-farmout-for-horse-hill-oil-site/comment-page-1/>

production! The applicant provides no details for this proposal, and the extraordinary reference to tea production implies that this is not a serious suggestion and is probably just another attempt to justify delaying restoration of the site. However, it does imply that despite the applicant's argument that they need time to collect data from the Horse Hill and Dunsfold development, they accept that this site is unproductive ⁶ and so are simply presenting reasons to justify delaying restoration.

Heat from existing oil wells is in fact a desirable, low carbon source of energy but it is not yet a mature technology and there a number of uncertainties⁷. The amount of useful heat from depleted oil wells is highly dependant on the temperatures within the well and the flow rates ⁸. As heat increases with the depth of the well, about 30⁰C per Km, wells of about 2-3 km depth are considered to have the potential to produce a usable level of low-grade heat. Other essential conditions include the local geology, the eruptive capacity within the well and the integrity of the well itself. These are all conditions of which the applicant should already have a fair estimate and consequently should be able to state whether this proposal is a realistic one. **I urge the planning officer to question the applicant for details of this resource and ascertain how realistic this proposal is.**

Another essential requirement is that this low-grade heat can be used close the where it is produced. I am not aware of any nurseries close to the site that could use this heat, let alone any local tea plantations! The applicant admits that they need to identify a "heat off-taker", but the physical constraints mean that these would have to be close to the site, so this would need to be a new development which will need both time and its own planning consent. Consequently, this whole proposal is quite separate and not strictly relevant to this particular application and should not be considered as a reason for granting an extension.

The National Planning Policy Framework (NPPF) states that "Effective enforcement is important to maintain public confidence in the planning system." In my opinion these repeated extensions, and failure to comply with the original conditions of the planning permission do much to undermine confidence in the planning system.

This was particularly so in July 2020, the third application for a time extension when there were 412 objections and only 125 letters of support. At the time Cllr Brian Quin questioned why this was not taken into consideration and was told that , "We look at the substance of the objections and comment and not just the numbers". I subsequently read all the letters of support and found the great majority were clearly from shareholders living all over the country, many giving either no comment or simple one statement comments of support. Only one supportive comment included a full paragraph but even this did not provide any additional information of substance. Unsurprisingly this has left me with little faith in this planning authority. I hope that on this occasion the planning officers will show more respect

⁶ ibid

⁷ <https://www.sciencedirect.com/science/article/abs/pii/S0960148122007959>

⁸ <https://www.thinkgeoenergy.com/how-could-geothermal-energy-be-derived-from-oil-wells/>

to the opinions of West Sussex residents. As of the 24th January 2024 there are 57 objections of the planning portal and one letter of support.

Yours faithfully

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