

James Neave - Principal Planner
Planning Services - West Sussex County Council
Ground Floor Northleigh - County Hall
Chichester - West Sussex
PO19 1RH

Our Ref: ZG/UKOG/BB2023/S73/631

Date: 28th February 2024

Dear James,

APP REF: WSCC/046/23
LOCATION: WOOD BARN FARM, ADVERSANE LANE, BROADFORD BRIDGE, BILLINGSHURST, WEST SUSSEX
PROPOSAL: THE SITING AND DEVELOPMENT OF A TEMPORARY BOREHOLE, WELL SITE COMPOUND AND ACCESS ROAD INCLUDING ALL ANCILLARY INFRASTRUCTURE AND EQUIPMENT (VARIATION OF CONDITION 1 OF PLANNING PERMISSION WSCC/002/22 EXTENDING THE PERMISSION BY 24 MONTHS TO ENABLE THE COMPLETION OF PHASE 4 SITE RETENTION AND RESTORATION)

Further to your e-mail 26th February 2024, please see below the Applicant's response to the issues raised.

1: UPDATED SURFACE WATER DRAINAGE

My letter 13th February 2024 confirmed the Applicant's willingness to agree to a monitoring condition and your e-mail provided indicative wording. The Applicant acknowledges the planning justification you rely on and accepts water management is a material matter for the County Planning Authority.

2: RATIONALE FOR A '2-YEAR' EXTENSION PERIOD

Your e-mail states it would be useful to understand how the Applicant has determined a '2-year' period (rather than a shorter/longer period) would be sufficient to allow the further appraisal of other sites and an indication of how or if this matches with the likely programme of works at those sites.

In response, the Planning Statement establishes the future use of Broadford Bridge will be determined by data from either the new Loxley (Exploration & Appraisal) Well Site or the existing Horse Hill (Production) Well Site:

- **Loxley:** anything less than 18-months (78 weeks) for data retrieval is technically unrealistic. Pre-construction conditions are yet to be discharged (having been delayed by a legal challenge which has since been quashed¹) and the 14-week period of well site construction has yet to commence. Once done, an 18-week drilling programme would pave the way for 26 weeks of well testing. This would deliver data for review during a final period of interpretation.

Of the 78 weeks available, 58 weeks are spoken for (construction works, drilling and well testing) which leaves a contingency of 20 weeks for the front-end discharge of conditions and a back-end period of date review and interpretation. This assumes all of the above stages run back-to-back and there are no unexpected interruptions which is unfortunately not the case with deep drilling. Accordingly, the 20 weeks also includes some buffer time to allow for bad weather, supply constraints &/or the vagaries of sub-surface investigation.

- **Horse Hill:** as above, anything less than 18-months (78 weeks) is unrealistic. The Supreme Court has yet to issue its ruling on the challenge against Surrey County Council's decision to authorise production. Should the challenge be quashed, the Applicant's intent is to acquire 3D seismic data over the field, process and interpret this data and then drill a new well.

¹ Court of Appeal ruling dated 9th January 2024 sent to you 11th January 2024.

In addition to the above:

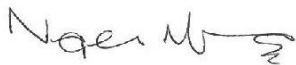
- if the data indicates the prospect of recovery at Broadford Bridge, a fresh planning application would need to be submitted to authorise further appraisal works and time would need to be allowed for this to happen; alternatively;
- if the data indicates no further prospect of recovery at Broadford Bridge, the Site would enter Phase 4.a) Restoration, and time would need to be allowed for these works to complete.

Bringing the above together, it is prudent to allow a minimum period of 24 months for data recovery from either Loxley or Horse Hill.

The Applicant is conscious of WSCC Policy M24.a) and NPPG para 217.e) which call for restoration at the '*earliest opportunity*'. In compliance with this policy, the Applicant has always sought a 2-year minimum period based on the above timeline but it has been events beyond the Applicant's control that have prevented the '*opportunity*' from being taken.

Should you require any additional information please do not hesitate to contact me.

Yours sincerely,



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Planning Project Manager