From:	Bob McCurry
To:	Jane Moseley
Cc:	Michael Elkington; Dominic Smith; "GeoffDavies@celtiqueenergie.com" (GeoffDavies@celtiqueenergie.com); Jenny Massingham; Gareth Wilson; Lucy Wood
Subject:	Proposed Temporary Well Site, Land south of Boxal Bridge, Wisborough Green (WSCC/083/13/KD)
Date:	18 July 2014 15:22:03
Attachments:	140718 WSCC Letter.pdf Appendix 1.pdf Appendix 2.zip Appendix 3.zip Appendix 4.pdf Appendix 5.pdf Appendix 6.pdf Appendix 7.pdf Appendix 8.pdf Appendix 9.zip Appendix 10.zip Wisborough Green Transport Objection Technical Response.pdf
Importance:	High

Dear Jane

Further to our recent correspondence regarding the above application, we write in response to the objection letter received from West Sussex County Council's Highways Department dated 2nd July 2014.

As stated in our letter dated 8th July 2014, Celtique is disappointed that, despite seeking to work positively with WSCC throughout the application process, Officers are recommending refusal on the basis of the Highway Officer's consultation response received on 2nd July 2014 (over 9 weeks after additional highway information was submitted for consideration on 25th April 2014 and only 5 working days before Officer's Committee Report was due to be completed on the 9th July 2014).

We understand from your emails of 7th July and 9th July 2014 that Officers were not prepared to meet with Celtique and their Highways consultant or defer the application so that Celtique may have a reasonable period of time to prepare and provide the additional highways information being requested.

In the meantime, the Council published its committee report on the 11th July 2014 recommending the application for refusal on the basis of the objections received by the Council's Highways Officer.

On the basis that, to date, Officers have declined to meet with Celtique and their Highways consultant or defer the application to allow additional work to be undertaken, Celtique have had no option but to instruct their Highways consultant (along with a second Highways consultant to assist) to work the overtime required in order to prepare the additional information and comprehensively respond to the Council's Highways comments dated 2nd July 2014 prior to the Council's committee meeting on the 22nd July 2014.

The additional information and response has been prepared by Celtique's Highways consultant, Mr John Russell, Regional Director at SCP Transportation Planning (who has over 20 years experience in the fields of traffic engineering and transport planning). Celtique have also sought to undertake an independent review of the work, which has been carried out by Mr David Bird, Founding Director of Vectos (who has over 30 years experience in this field).

Accordingly, please find attached the following:

- Covering letter dated 18th July 2014, prepared by Barton Willmore;
- Draft 'Transport Objection Technical Response' dated July 2014 (including Appendices 1 – 10), prepared by SCP (and independently reviewed by Vectos);

4 hard copies of this material and 1 CD have been sent to the Council by special delivery in today's post. We will also arrange for this information to be sent by file transfer.

On the basis of the additional highways information prepared by SCP and independently reviewed by Vectos, Celtique are respectfully requesting that the Council reconsiders its decisions not to defer the application from the 22nd July committee meeting. The response provided by SCP is in draft at this stage as we would wish to discuss the content and conclusions with Officers so that an agreed Report can be made available to Members to inform their consideration of the application.

We believe that deferring the application to the next Committee to be held on 2nd September 2014 is justified due to the following key reasons:

- Council Officers and Committee Members need sufficient time to consider all information available to them ahead of making a formal decision on the application;

- The Council's Highway objection was received late (2nd July 2014) in relation to the completion of Officer's committee report (by 9th July 2014) and did not provide a reasonable period of time for Celtique and its advisors to respond to the matters raised which included new matters, not previously discussed;

- Taking into account that Celtique agreed to extend the determination period when WSCC have asked (working pro-actively with the Council to resolve all outstanding issues);

- The fact that WSCC Highways Officer did not respond to SCP's telephone calls/ emails during June 2014 (ahead of receiving the objection letter);

- The fact that we are confident that the objections can be overcome locally;

- Bearing in mind paragraphs 186 and 187 of the NPPF which require local planning authorities to 'approach decision-taking in a positive way' (para 186), 'look for solutions rather than problems' and 'work proactively with applicants' (para 187);

- Any refusal could result in a re-submission or appeal which could be a further expense to taxpayers' money via the Planning Inspectorate and unnecessary cost to Celtique (who are merely seeking to undertake essential exploratory works within a licenced area granted by central government) and a further period of uncertainty for local people;

- The extension of time would only be for a short period of time (over the Summer) until 2nd September 2014.

On the basis that WSCC Highway's objection letter has been received so late in the process and we are confident that the points raised can be adequately addressed, as demonstrated in the additional information prepared by SCP and independently reviewed by Vectos, we would kindly request that the application is deferred from the July committee in order to allow a full consideration of this additional information.

Celtique Energie is extremely keen to work with the Council to overcome this matter and continue to work positively with the Council.

We look forward to hearing from you soon.

Regards

Bob McCurry
Director

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