

Objections needed: UKOG appeal against refusal of permission for their gas well in Dunsfold/Loxley

Dunsfold Planning Inquiry – **deadline for responses April 6th 2021**

UK Oil & Gas Plc (UKOG) is appealing against Surrey County Council's decision from November last year to refuse their application for the exploration and appraisal of fossil fuels at Loxley in Dunsfold.

The appeal is now open for representations to the Planning Inspectorate – even if you've already objected to the proposal.

Surrey County Council says it's forwarding all previous submissions but here's your chance to add further comment in direct response to UKOG's 'Statement of Case' <https://www.ukogplc.com/ul/Loxley%20appeal%20Site%20Statement%20of%20Case.pdf>.

You need to quote the appeal reference **APP/B3600/W/21/3268579** and send in your submission here <https://acp.planninginspectorate.gov.uk/>.

Please object even if you've objected before. Please stick to planning issues.

Below we suggest some issues you might want to raise, with reference to the relevant planning policies. Please use your own words and knowledge to make your points. Remember that this application is for exploration site for gas, so some of the arguments about the 'need' for oil that we've used in other cases don't apply here.

The planning application was turned down by Surrey Councillors on two main grounds: highways and landscape impacts. It helps to reinforce their concern about these issues.

1. Highways

The turning into and out of High Loxley Road immediately after a blind bend on Dunsfold Road is in a very dangerous location particularly for large and slow moving vehicles like tankers. The current proposals haven't been subject to a Road Safety Audit.

Relevant policies: The proposal would result in an adverse impact on highway safety in conflict with Policy MC15 Surrey Minerals Plan, Policy ST1 of the Waverley Local Plan 2018 and the NPPF 2019 Para 109.

2. Landscape

The site is on the edge of the Surrey Hills Area of Outstanding Natural Beauty and will be visible from Hascombe Hill. AONBs enjoy the highest state of landscape protection in law. It is also in an Area of Great Landscape Value (this does not have the same legal protection). You will have your own views about the impact a drill site has on the landscape even though UKOG says this is not significant.

Relevant policies: The proposal would result in intrusive structures within an area of Area of High Landscape Value and Sensitivity, in conflict with the Local Plan. Due to the nature of development proposed on a greenfield site, and the visual impact of the proposed development, the proposal would fail to enhance the landscape value or protect the intrinsic character and beauty of the Countryside. Furthermore, the proposal would lead to the erosion of the landscape character. It has not been demonstrated that the proposal would enhance the landscape character. The proposal would therefore be contrary to Policies SP2, RE1 and RE3 of the Waverley Local Plan 2018 and the NPPF 2019 Paras 170 and 180.

You can also make representations on other issues which UKOG has itself brought up under the following headings.

1. Air quality and air emissions/climate change

UKOG says: “*indigenous exploration represents the most efficient use of resources by virtue of proximity and the opportunity it affords UK regulators to control the exploration and extraction process in the best interests of climate change mitigation*”. **This statement is not as black and white as is made out.**

- New fossil fuel sites are not needed to meet the Government’s statutory carbon reduction targets and the aim of getting to Net Zero carbon by 2050. More detail here <http://www.wealdactiongroup.org.uk/climate-change/>
- Fossil fuels from long-standing offshore sources (some of which are also indigenous) can have a lower carbon footprint than new onshore exploration as they use pipelines, not ships. 44% of our gas comes from the North Sea and Irish Sea by pipeline and
- Gas use is set to fall dramatically with the phasing out of gas in new homes from 2025. The Committee on Climate Change’s 6th Carbon budget report shows demand falling by 75% by 2050 compared to today.
- UK regulation is far from perfect. <https://www.keithtaylormep.org.uk/publication/far-from-gold-standard>. People living near oil and gas sites around the country have reported failures in regulation, concerns about planning enforcement, pollution incidents that are not dealt with and major issues like earthquakes falling between the different regulators. Please give your own examples.
- UKOG says the proposal will contribute to energy security and that to “*do nothing*” is not an option: Hydrogen (which UKOG implies any gas it extracts may be used to make) will be a part of our energy future, but it needs to be made from renewable sources rather than fossil fuels to help us reach Net Zero rapidly. Investment should be in green hydrogen, rather than fossil hydrogen with carbon capture and storage in order to maximise emission reductions. Reducing demand and increasing the supply of renewables are the best ways of maintaining energy security. More detail: <http://www.wealdactiongroup.org.uk/mdocs-posts/hydrogen-and-the-net-zero-carbon-economy/>
- Today onshore production of gas accounts for just 0.4% of total UK production. Even if any gas found at Dunsfold proved commercially viable to extract its contribution would be negligible to maintaining energy security.

2. Planning (and earthquake risk)

The applicant hasn’t carried out any seismic appraisal of the area, which is good practice and the records show that other attempts to find minerals in the area have all failed or been non-commercial. As a result, the applicant has failed to demonstrate the need for the proposed exploration works.

Policies to cite: The planning balance assessment would not support the proposal as it would be in conflict with Policy MC12 Surrey Minerals Plan 2011.

3. Economy

Evidence UKOG provided showed that there would be a very low level of long term job creation and no direct contribution to the rural economy other than to the landowner leasing out the land. The proposal will however have a devastating impact on some neighbouring rural businesses (including a wedding venue) which depend on the special qualities of this

beautiful and tranquil rural area. We know from oil and gas sites around the Weald that job gains are always exaggerated at the application stage and the only economic benefit to the local area can be two security guards having a drink at the local pub.

Relevant policies: The proposed development will result in an unacceptable impact on the viability of local businesses, appropriate assessments have not been undertaken or suitable mitigation measures proposed. The proposal would result in an adverse impact on the local businesses and economy in conflict with MC14 of the Surrey Minerals Plan 2011, Policy EE2, CC1 and RE3 of the Waverley Local Plan 2018 and the NPPF 2019 Paras 83 and 84.

4. Ecology

The ecological information submitted with the application fails to provide a quantitative assessment and therefore does not address the requirement of the National Planning Policy Framework to provide a measurable net gain for biodiversity as a result of development.

Policies to cite: The proposal therefore fails to accord with Policy NE1 of Waverley Local Plan 2018 and the National Planning Policy Framework 2019 Paras 175 and 177 (*note – policy requirement is to enhance biodiversity*) I

5. Impacts on local traveller community

The proposals will encroach onto a nearby Gypsy and Travellers site where the residents are living in mobile homes and this activity has the potential to negatively affect the established living conditions of the site.

Policies to cite: The poor neighbour activity proposed would result in an adverse impact on Waverley Borough Councils traveller's accommodation strategy in conflict with Policy AHN4 of the Waverley Local Plan 2018

Technical issues relating to the operation of the site

Anyone with experience at Horse Hill, Broadford Bridge or PEDL 143 (which includes Leith Hill) before it was surrendered might have something to say about how UKOG operates at its sites. You might want to mention: lack of meaningful consultation with local residents; pollution incidents; insensitive and prominent fencing and barriers; breaches of highways conditions; draconian injunctions on peaceful protest which alienate local residents and the wider community; dragging out its presence at sites beyond the point where sites are demonstrated to be unviable thus blighting the local community with an ongoing threat of activity.

Thank you