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Sent: 28 August 2020 15:55
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Subject: SCC REF 2019/0072 AND WBC REF WA/2019/0796

SCC REF 2019/0072 AND WBC REF WA/2019/0796

I OBJECT to this application

Having viewed the decision made online by councillors on 29th June to refuse this application and learnt that the decision is now to be rerun, I am lodging a further objection. This objection includes observations on the way the planning process has been conducted by Surrey County Council so far.

IN SUMMARY

There appears to be a strong presumption in favour of this Applicant. Tenuous scientific assertions (regarding the basis for exploration, and its operations being 'net zero' compliant) made by the Applicant have been readily accepted as Gospel truth. Conversely, anyone objecting to the project has had a mountain to climb in terms of demonstrating harm. Please see my specific observations in support of this statement, below.

UKOG's finances are unstable and it appears to be operating a scheme of continually launching new exploration sites, with little hopes of success, to generate investment from small and unwitting investors, thereby funding its CEO's lavish lifestyle. It is unlikely to have the funds to restore the site.

A public body, representing public interests, has a duty to scrutinise these proposed activities carefully before giving licence to further deplete our environment and deface our countryside with no good reason.

SPECIFIC OBSERVATIONS ON THE MEETING OF 29TH JUNE

1) Many assertions made by and for the Applicant went unchallenged despite no evidence to support them, or even evidence to the contrary. Here are some examples:

a) The 'remoteness' of the site (Nigel Moore, UKOG) - in fact 370 people live within 450m, most of them in the Gypsy Roma Traveller community and apparently invisible in this process

b) That a temporary exploratory well site would fulfil the UK's PPE needs imminently (Matt Cartwright, UKOG) – not a serious suggestion

c) That UKOG's drilling operations are 'net zero compliant' (Steven Sanderson, UKOG) – I have seen no evidence of this

d) That the proposed exploratory site would be quantifiably commercially viable (Steven Sanderson, UKOG) – a claim not supported by available data on exploration in the area nor by other local sites which are sub-commercial

e) The assertion that by giving permission for exploration in one location, SCC could not refuse permission in another location (Cr Ernest Mallett) was unchallenged - if this were true, then holding a planning meeting would be a redundant exercise

2) Fear of appeal appeared to be directing the decision – this is not a planning issue

“The council will be slaughtered on appeal” (Cr Mallett). This opinion was echoed, in less crude terms, by the SCC’s officers attending the meeting. It hung over the meeting as a kind of threat.

3) Anxiety to bury serious traffic concerns and make haste to approval seemed inappropriate

I have seen the documents obtained through FOI which demonstrate that traffic management has been a serious issue, even during the pre-application phase of this application. Traffic issues have remained a contentious matter, indeed papers were still being issued to Councillors as late as 9.15 am on the morning of the meeting of 29th June. It is of significant concern therefore that Caroline Smith’s comment: “Surely the best time to look at the detail is at the time of implementation of planning permission?” failed to reflect that Traffic Management remained an outstanding issue.

4) Ambiguity about the meaning of planning advice was consistently used in favour of the Applicant rather than local interests

When directly asked to confirm it by Cr Muir, Planning Officer Maxwell acknowledged that local economic impact was ‘material’ in this situation. Elsewhere in the proceedings this fact was buried – or even refuted – by the SCC planning and legal team. Later statements by Nancy El-Shatouri appeared to deny that local economic impact was material in the decision at all.

5) There was little scrutiny of the need for the application to have ‘quantifiable benefits’ (SMP 2011 MC15)

A higher standard of evidence was always required from local objectors than from the Applicant. Local objectors were able to quantify the harm to local businesses and economy.

The Applicant’s expressions about future profit could, in the circumstances, only be a ‘wish list’.

GENERAL POINTS ABOUT THE CONDUCT OF THIS APPLICATION

Prior to the 29th June meeting, a clear impression of bias towards the Applicant had already been created by SCC’s decision to use drone footage created by the Applicant (in lieu of a site visit by councillors) - to influence traffic considerations, and rejection of footage from an independent consultant commissioned by the objectors.

Despite the systemic bias shown in favour of the Applicant, and strong pressures at the meeting to decide in favour of the application (‘slaughtered on appeal’ etc)) the councillors came to what I (and over 700 other objectors) believe to be the right decision on 29th June.

There seemed to be a general unpreparedness by SCC officials for the fact that councillors might exercise their discretion and refuse the application. The indignant claims that have followed that there was no basis for the refusal are contradicted in the recently published minutes of the meeting of the 29th June which record that the reason for the refusal was that It has not yet been demonstrated that there is a need for the development nor that the adverse impacts in respect of highways, noise, lighting and air quality will not be significant contrary to policies MC12, MC14 and MC15 of the Surrey Minerals Plan 2011.

The fact that the democratic decision of 29th June has been challenged and forced to be rerun, further adds to the impression that SCC is being bullied by UKOG shareholders to bolster the interests of a failing private company at the expense of local democracy and Surrey’s own environmental commitments.

Yours faithfully
Mela Davidson

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