

MINUTES of the meeting of the **PLANNING AND REGULATORY COMMITTEE** held at 10.30 am on 27 November 2020 at Remote.

These minutes are subject to confirmation by the Committee at its next meeting.

Members Present:

Mr Tim Hall (Chairman)
Mr Saj Hussain
Mrs Bernie Muir
Dr Andrew Povey
Mr Keith Taylor
Mrs Rose Thorn
Mr Stephen Cooksey
Mr Ernest Mallett MBE
Mrs Penny Rivers
Mr Tim Evans
Mrs Yvonna Lay (substitute)

Apologies:

Mrs Mary Angell

31/20 APOLOGIES FOR ABSENCE AND SUBSTITUTIONS [Item 1]

Apologies for absence were received from Mary Angell. Yvonna Lay substituted for Mary Angell.

32/20 MINUTES OF THE LAST MEETING [Item 2]

The Minutes were APPROVED as an accurate record of the previous meeting.

33/20 PETITIONS [Item 3]

There were none.

34/20 PUBLIC QUESTION TIME [Item 4]

There were none.

35/20 MEMBERS' QUESTION TIME [Item 5]

There were none.

36/20 DECLARATIONS OF INTERESTS [Item 6]

Andrew Povey declared a non-pecuniary interest as a trustee of the Surrey Hills Society.

37/20 MINERALS AND WASTE APPLICATION WA/2019/0796 - LOXLEY WELL SITE - LAND SOUTH OF DUNSFOLD ROAD AND EAST OF HIGH LOXLEY ROAD, DUNSFOLD, SURREY [Item 7]

Officers:

David Maxwell, Senior Planning Officer
 Caroline Smith, Interim Planning Group Manager
 Stephen Jenkins, Interim Planning Development Manager
 Andrew Stokes, Transport Development Planning
 Nancy El-Shatoury, Principal Lawyer
 Joss Butler, Committee Manager

The Principal Lawyer summarised the legal position in relation to this item. The speech presented to the Committee is attached to these minutes as Annex 1.

Speakers:

Sarah Goodwin made representations in objection to the application. The speech presented to the Committee is attached to these minutes as Annex 2.

Tom Gordon made representations in objection to the application. The speech presented to the Committee is attached to these minutes as Annex 3.

Ashley Herman made representations in objection to the application. The speech presented to the Committee is attached to these minutes as Annex 4.

Chris Britton made representations in objection to the application. The speech presented to the Committee is attached to these minutes as Annex 5.

John Gray made representations in objection to the application. The speech presented to the Committee is attached to these minutes as Annex 6.

Ashley Ward made representations in support of the application. The speech presented to the Committee is attached to these minutes as Annex 7.

The applicant's agent / applicant, Nigel Moore and Stephen Sanderson, spoke to the Committee in response to the public speakers' comments. The speech presented to the Committee is attached to these minutes as Annex 8.

The Local Member, Victoria Young, spoke for three minutes. The speech presented to the Committee is attached to these minutes as Annex 9.

Key points raised during the discussion:

1. David Maxwell, Senior Planning Officer, introduced the report and provided Members with a brief summary. A supplementary agenda was published on 26 November 2020 which included an update sheet for the item. Additional representations are attached to these minutes as Annexes 10, 11, 12, 13 and 14. Members noted that the proposal was for the construction, operation and decommissioning of a well site for the exploration and appraisal of hydrocarbon minerals from one exploratory borehole (Loxley-1) and one side - track borehole (Loxley -

1z) for a temporary period of three years involving the siting of plant and equipment, the construction of a new access track, a new highway junction with High Loxley Road, highway improvements at the junction of High Loxley Road and Dunsfold Road and the erection of a boundary fence and entrance gates with restoration to agriculture. Members noted that the County Highway Authority had raised no objections to the application subject to conditions. The full report and annexes are located from pages 3 of the meeting's agenda.

The Committee adjourned from 11:39am to 11:47am.

2. Members asked for clarification on the difference between 'grey hydrogen' and 'green hydrogen'. It was noted that 'green hydrogen' was from renewable energy and 'grey hydrogen' was from fossil fuels. It was however noted that there was no reference to hydrogen in the planning statement submitted by the applicant.
3. Members stated that, if found, they understood the benefits of hydrogen discovery to the nation however asked for guidance on how that should compare to the impact of the development on the local community. Officers stated that the impact had been assessed in depth in the officer report
4. Officers stated that it was important for Members to keep in mind that the National Planning Policy Framework (NPPF) stated that mineral extraction should be facilitated and that, when determining planning applications, great weight should be given to the benefits of mineral extraction, including to the economy. In response, a Member said that they would like clarification on exactly what benefit gas would bring to the nation in terms of volumes. Officers reminded Members that the purpose of the application was for exploration and appraisal and therefore they were unable to confirm details on volumes. Officers went on to remind Members that the application should be considered on its own merits as submitted rather than outside material.
5. The Committee highlighted that the applicant had made comments on the potential economic investment in the local area however Members were not clear on how the local community would get a monetary benefit. It was also noted that the report outlined that there was a condition proposed related to the development using local supplies which was not accepted. With regard to the first comment, officers stated that, due to the details of the application, it should be assumed that the development would have a benefit in Surrey. In regard to the proposed condition, officers stated that the applicant had previously issued a statement to address the concerns raised in the June 2020 Planning and Regulatory Committee. Eight new or amended conditions were suggested however officers recommended that the condition on local procurement and economic growth was not included due to guidance that conditions should be kept to a minimum and only imposed when necessary. Officers stated that the condition was not necessary to make the applicant acceptable. In response to the comment from officers regarding benefits to Surrey, a Member stated that it should not be assumed that jobs would be available to the local community and that the impact on the local economy should be seriously considered.

6. Members noted that the applicant had stated that they would ensure operations do not impact the Trew Fields Festival for 2021, 2022 or 2023. It had also been stated that the applicant would also communicate with local businesses and residents to ensure impacts were minimised or kept to an acceptable level.
7. A Member stated that existing local businesses were already impacted by the pandemic and felt that the operation would adversely impact them even further. It was also added that the public speakers in objection spoke very strongly against the application and that Members should give consideration to this.
8. A Member noted that the speaker who spoke 'for' the application stated that operations would not interfere with the wedding venue on weekends and would also not interfere with the Trew Fields Festival.
9. With regard to Government direction, a Members stated that the Government's ten-point plan for green industrial revolution did not refer to fossil fuels. Officers responded that it was a gradual transition from fossil fuel energy to renewable energy and that Government policy recognised that there was still a need for oil and gas.
10. A Member felt that much of the committee's discussion in objection to the application was not relevant to planning regulations.
11. A Member stated that it was clear climate change was happening and that it was important to consider the impacts on children.
12. A Member felt that residents' impression of an oil and gas site was worse than the reality and that there were examples in Surrey of what a properly managed extraction site looked like. Other Committee Members did not agree that it was fitting to compare the application to other sites due to its context and impact on the local community.
13. Members asked for clarification on the current situation following the council previously agreeing that an Area of Great Landscape Value (AGLV) designation would be treated the same as Area of Outstanding Natural Beauty (AONB) designation. Officers said that, in planning terms, planning decisions should be made in accordance with the development plan and other material considerations and that the weight attributed to other policy, compared to the development plan, was limited.
14. Officers stated that they felt the need for the application was justified.

The Committee adjourned between 12:41pm to 12:50pm

15. Officers summarised the details of the application and stated that it was not reasonable to suggest that a business would fail due to the application. The impact on the business should be considered but should be weighed against the details of the application. Some Members of the Committee did not agree with the officer's statement.
16. Officers highlighted that the applicant conducted a site search of 23 sites and the Dunsfold site was considered to have the least impact on the environment and local community
17. Members stated that it would have been favourable to have pictures of the screening around the site in the winter rather than during the month of May. Officers confirmed that the applicant had dealt with this by superimposing pictures of the wellsite to better understand how it would look during the wintertime.

18. A Member highlighted that the policy MC14 said that there should be no significant adverse impact arising from the development and they did not feel that was the case. It was also stated that there should have been a proper assessment of the impact on the local businesses.
19. With regard to highways, Members were concerned that Dunsfold Road was not suitable for HGVs. There was also concern that additional HGV use would cause cyclists and pedestrians to be more at risk. Members further stated that additional traffic would also impact the future Dunsfold Park Garden Village development. Officers confirmed that the road was only partially unsuitable for HGVs and that the relevant section, between the A281 and High Loxley Road, was suitable. It was further confirmed that there would be a maximum of 20 HGV movements per day which made the risk of additional traffic accidents low.
20. In response to Members' concerns related to whether traffic lights or banksman would be used on the local road, Officers explained that that there was a desire to minimise the use of traffic signals due to their impact on traffic. Members noted that details of the use of banksman and traffic lights and further traffic related details would be made available within the Construction Management Plan (CMP). It was further noted that there was a requirement within the CMP condition that consultation with the local events business should be undertaken to understand their traffic flow needs. Officers also stated that the advisory signage present was to discourage the through routing of HGVs.

The Committee adjourned between 13:17pm to 13:47pm

21. A Member of the Committee highlighted that the application was for exploration and therefore any discussion related to potential discoveries was irrelevant. It was also stated that mineral extraction would be necessary as the nation converts to greener energy. In regard to the impact on Dunsfold Park Garden Village, the Member explained that it was usual practice to mine tunnels under housing and that it should not affect housing prices. Furthermore, the Member stated that it was not a requirement for the applicant to consider the impact on other businesses. Concerns were also raised that the Committee's discussion related to the highways impact of the application and the lack of proper planning arguments.
22. The Committee asked whether there were any examples of UKOG not complying with transport management plans for other sites within Surrey. Officers stated that they were not aware details of breaches however Members should note that the application should be considered on its own merits.
23. Members noted that late written representation outlined concerns regarding the impact on the Dunsfold Park Garden Village. Officers stated that details were outlined within the update sheet which was published on 26 November 2020.
24. Cllr Penny Rivers moved a motion for refusal due to the significant adverse impact which arose from the development. It was stated that the proposal was in conflict of planning policies MC1, MC14 and MC15. The motion was seconded by Dr Andrew Povey.

25. Officers highlighted that the development was for a temporary period of three years for exploration and appraisal and would involve a drilling rig that would be present for a limited period. Members noted details of other similar developments in Surrey which did not have adverse impacts on the environment or local businesses. It was further confirmed that there were no regulatory or technical objections to the current application.
26. Cllr Andrew Povey spoke as seconder to the motion and stated that he endorsed Cllr Penny River's reasons and raised concerns related to the impact on local businesses, highways and impacts on the landscape.

The Committee adjourned between 14:27 and 14:57

27. The Chairman provided Members with a summary of the debate.
28. The Principal Lawyer reminded Members that, although the cost consequences of a decision were not a material planning consideration, Members should bear in mind the importance of having proper planning reasons that would stand up to scrutiny supported by robust evidence.
29. The Chairman asked Members to vote on the following reasons for refusal which were agreed by Cllr Penny Rivers and Cllr Andrew Povey:

Reason 1: It has not been demonstrated that the highway network is of an appropriate standard for use by the traffic generated by the development, or that the traffic generated by the development would not have a significant adverse impact on highway safety contrary to Surrey Minerals Plan Core Strategy 2011 Policy MC15.

Reason 2: It has not been demonstrated that the applicant has provided information sufficient for the mineral planning authority to be satisfied that there would be no significant adverse impact on the appearance, quality and character of the landscape and any features that contribute towards its distinctiveness, including its designation as an Area of Great Landscape Value, contrary to Surrey Minerals Plan Core Strategy 2011 Policy MC14(iii).

30. Six Members voted for the motion and five Members voted against. There were no abstentions. Therefore, the motion for refusal was carried.

Actions / further information to be provided:

None.

Resolved:

That the Committee REFUSE application WA/2019/0796 due to the following reasons:

Reason 1: It has not been demonstrated that the highway network is of an appropriate standard for use by the traffic generated by the

development, or that the traffic generated by the development would not have a significant adverse impact on highway safety contrary to Surrey Minerals Plan Core Strategy 2011 Policy MC15.

Reason 2: It has not been demonstrated that the applicant has provided information sufficient for the mineral planning authority to be satisfied that there would be no significant adverse impact on the appearance, quality and character of the landscape and any features that contribute towards its distinctiveness, including its designation as an Area of Great Landscape Value, contrary to Surrey Minerals Plan Core Strategy 2011 Policy MC14(iii).

38/20 SURREY COUNTY COUNCIL'S LOCAL LIST: REQUEST FORMAL ADOPTION OF LOCAL LIST FOR THE VALIDATION OF COUNTY DEVELOPMENT AND COUNTY MATTERS PLANNING APPLICATIONS [Item 8]

Officers:

Jessica Darvill, Planning Officer
 Stephen Jenkins, Planning Development Manager
 Caroline Smith, Planning Group Manager
 Joss Butler, Committee Manager

Speakers:

None.

Key points raised during the discussion:

1. The Planning Officer introduced the report and informed Members that the report was to advise Members of the responses in regard to the recent consultation on the proposed Local List for the Validation of Planning Applications received by Surrey County Council and the amendments that had been made as a result. Officers also requested that that the committee formally adopt the Local List allowing for periodic reviews of the Local List and officers to update technical notes following engagement with relevant consultees, when and if required.
2. Members asked for details on the consultation that was undertaken.
3. In regard to pages 248 and 249 of the agenda, a Member of the Committee said that impacts to landscape and the affect on local businesses should be taken into account when considering a planning application. Officers stated that the landscape assessment was outlined in guidance and policy and therefore the material would need to be amended to make changes within the validation checklist. Officers confirmed that the mineral plan would soon be reviewed and the Members comment would be taken into consideration.

Actions / further information to be provided:

None.

Resolved:

Members adopted the Local List of Validation of County development and County Matters Planning Applications.

39/20 DATE OF NEXT MEETING [Item 9]

Meeting closed at 3.23 pm

Chairman

My name is Nancy El-Shatoury. As Principal Planning Solicitor regularly advising members of this committee I have been asked to summarise the legal position in relation to the item before members

Counsel was instructed to advise following the planning committee meeting of 29 June 2020.

As members will recall this was the first remote P and R meeting

Members resolved to go against officer recommendation and refuse the Application by a majority of 6 votes to 5.

Many individual complaints were received subsequently alleging procedural irregularities that the complainants asserted invalidated the result

The applicant's lawyers wrote to the effect that the committee resolution was unlawful and that it should be referred back to Committee for redetermination. The applicant was considering its options which included:

A judicial review of the decision

An appeal against refusal on the basis that the decision was unlawful and not based on any objective analysis

Formal complaints regarding conduct of Committee and conduct of certain individual members

Counsel met officers and was asked to view the recording of the meeting, to consider if there were any such irregularities and if so what should be done to rectify them

While noting the reluctance of the courts to scrutinise planning committee meeting deliberations in a forensic manner, the understandable difficulties of holding the first remote planning committee in the County, and technical glitches – Counsel was concerned that certain members voted who may not have been present throughout the consideration of the item in breach of the County's code of Best Practice in Planning Procedures, and as required by the 2020 Regulations governing remote committees, because it appeared at times that they could not hear and be heard. Those votes clearly made a difference to the outcome given the close vote.

Counsel concluded therefore that there was a significant likelihood that a Court would on these issues alone declare the resolution as invalid and unlawful. However she also highlighted other matters that might also be of concern to a court i.e that a local member is limited to speaking for 3 minutes and cannot subsequently participate in the committee, that parts of the debate may have been missed by Members, some Members appeared to have other members of the household with them and communicating with them, appearing on screen raising the perception of unfairness, and the use of the "chat" log potentially allowing private chat between participants.

As no decision notice had been issued Counsel confirmed that the resolution had no effect. She furthermore stressed that a local authority may have a duty to reconsider

its decision if flaws in decision making are brought to its attention before a decision notice is issued.

Counsel advised that a local authority may therefore revoke a resolution to grant or refuse and may then redetermine an application before issuing its decision

On any redetermination, Counsel stressed that members of the public and the applicant should be able to make or remake their statements orally and there should be full provision for debate by members.

Technical problems should be resolved so that everyone could hear and be heard throughout, no others should be present with councillors(although if there is a need for assistance for example because of disability this should be raised with the Chair in advance), and the chat function should be used appropriately.

This should ensure that any remote access to the meeting is conducted in a fully fair manner.

The County's Director of Legal Services and Monitoring Officer advised on the strength of Counsel's advice that the application should be determined afresh by the Planning and Regulatory Committee.

Given that it is likely that the many of the same Members will be voting today as voted previously, the issue of Predetermination needs to be touched upon given the expectation that the application will be considered afresh entirely fairly.

I would like therefore to remind members of some points in relation to predetermination as well as lobbying

As part of the legal training Members received before sitting on this committee, they have all had training in bias, predisposition and predetermination

As a condition of sitting on this Committee, Members signed up to Surrey's Code of Best Practice in Planning Procedures which makes clear that they should keep an open mind when considering applications in accordance with relevant planning considerations. Members have their own copy of the Code.

Whatever their views, councillors will approach their decision-making with an open mind in the sense that they must have regard to all material considerations and be prepared to change their views if persuaded by the evidence before them, representations and debate.

Members who previously have done something that might directly or indirectly indicate what view they took, would or might take in relation to a matter and the matter was relevant to the decision, but who came to the Committee prepared to hear all relevant considerations will not be perceived to have a closed mind when voting on the application. It is important that the minds of members be open to any new argument at all times up to the moment of decision

Turning now to lobbying, where Members are encouraged to vote in a particular way by objectors or supporters the Members' Code of Conduct stresses the need to be

impartial and be seen to be impartial when carrying out public duties. Members understand that they must not favour any person, company, group or locality.

Finally we are reminded by our Code of Best Practice that when members are minded to go against officer recommendation “ the Chair must summarise or cause to be summarised the salient points of the debate and ensure the text of the proposition is clearly understood before putting the matter to the vote”. The Chair will therefore summarise before the vote should such a situation arise.

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I have lived in Dunsfold for 27 years – it's an unspoilt village just 1.5 kms from the proposed drill site; situated in the Surrey Hills Area of Great Landscape Value, bordering the AONB; under the Waverley Local Plan Policy RE 3 this area has the same principles for protection until its incorporation into the AONB is reviewed.

From the Officers report we know representations sent by objectors are over 80% of the total. But in my view, the revised Report fails to give due consideration to issues raised, which demonstrate the significant adverse impact on our environment and amenities WITHOUT A BALANCE OF positive benefits.

Surrey CC's Climate Emergency Strategy includes some objectives for our futures-

1 Residents live in clean, safe and green communities

Dunsfold and surrounds are just that, BUT this will change if an industrialised drill site is permitted.

2 Journeys across the county are easier, predictable and safer.

If consent is given, large tankers will be turning into a narrow rural lane on a dangerous blind corner, already infamous locally for frequent accidents – a cause for serious concern.

3 Businesses in Surrey thrive.

UKOG makes some exaggerated and inflated claims in this application about its local and national importance. But the IMMEDIATE adverse impact will be at demonstrable cost to three existing local businesses adjacent to the site; these are *real* costs, with a *real* risk of being jeopardised by the development.

An additional issue is the impact on Dunsfold Park Garden Village - a core pillar of Waverley's housing strategy.

The viability of the whole Village project will be literally undermined by the reality of a lateral shaft drilled underneath it.

Any negative impact on housing delivery here will send shock waves throughout this part of Surrey, particularly areas outside the green belt.

The applicant suggests we'll see benefits to the local economy, but it's unlikely during 3 years exploratory drilling; there's no guarantee of future production therefore no guarantee of benefits.

The Government has publicised its Green Revolution - onshore drilling and fossil fuels do NOT feature in their new measures. Surrey Minerals Plan has not changed since 2011 and is now due for review.

UKOG has failed to offer a convincing explanation for how the Loxley scheme would benefit the climate crisis; hydrogen is a buzz word but conversion of any gas found there would only produce GREY hydrogen, not clean *green* hydrogen.

What we do in Surrey, in the U.K, impacts across the globe. And vice versa.

Climate change does not recognise borders.

To conclude. Such a speculative and potentially damaging drilling operation is neither justifiable, nor in line with planning policy, nor appropriate in 2020.

So please vote to refuse this application.

THANK YOU

High Loxley Road is a long meandering private lane, edged with hedgerows, fields and wild flowers.

It provides the tranquil approach that leads to High Billingham Farm... the home, where my family and I have invested our time, energy and savings in developing a **very** special wedding venue business which has gained a unique and outstanding reputation.

Our wonderful approach and idyllic location, with far reaching views towards Hascombe Hill in the AONB, are **key features** that set us apart from many others... They create the very first impression of our venue.

There is no doubt that considerably widening High Loxley Road... enough to accommodate two passing HGVs... the replacement of hedgerows with over 50 metres of security fencing and gates, traffic controls, signage and artificial lighting, **will** completely destroy the rural character and appearance of our approach from clients that come to view during the week when weddings are not taking place but the proposed site will be fully operational.

It may only be 338 metres from my home, but the site itself will be less than **100 metres** from our boundary sitting directly between us and our views towards the AONB which form the backdrop for many of our outdoor wedding ceremonies.

The noise, light and odour will be relentless - This speculative exploration site cannot be compared with producing sites such as Storrington or Albury which have been established for over 30 years, are half the size, completely shielded by woodland on all sides and without houses or businesses in close proximity which could be negatively affected by the development.

The 37 metre high oil rig, will be in direct line of sight **and** earshot of our home and wedding venue, our rural setting will be ruined, having an **immediate** and **devastating** impact on our business... our reputation... and our livelihood.

Our venue attracts couples from all over the country and we are licensed to hold up to 50 events a year with up to **8000** visiting guests from all over the world and I would estimate that we could conservatively generate in the region of £3.5m - £4m a year for the many businesses and suppliers that all help to support our events the vast majority of which are based in Surrey:

Caterers, local food producers, serving staff (typically about 20 per event), florists, stylists, dressmakers, marquee companies, musicians, event planners, technicians, celebrants, photographers, hotels, BnBs, drinks suppliers including our neighbour at The Crafty Brewing Company, mobile bars, pubs, taxis and not least of all the local parish churches where ceremonies often take place bringing them essential income and outreach.

This is a business that we intend to grow and venues as unique as ours are very few and far between, and so the revenue that our business attracts to this part of Surrey will simply vanish.

Permitting this application will not only severely impact **our** business, but **many, many** others locally.

I would therefore urge you to **please** consider this when making your decision, and **refuse** this **speculative** application, because the adverse impacts clearly outweigh any possible benefit.

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ASHLEY HERMAN SUBMISSION TO SCC

18 months ago, Brian Alexander, UKOG's PR Executive, told me that they chose this site because it is "in the middle of nowhere."

It isn't. It lies within the heart of a community. Three farms, two Gypsy, Roma, and Traveller settlements, comprising 85 homes and whose voices have long been ignored in this matter.

360 of us living within 500 metres of the site.

My home, Thatched House Farm, is only 230 metres away.

Like High Billingham, we have established Farm Diversification projects.

In addition to keeping livestock, we established the Trew Fields Cancer Awareness Festival, which attracts 1000 people annually, and is attended by health professionals, NHS Practitioners, Cancer sufferers, and their families. Hundreds more come to our follow-up events and retreats throughout the year

Its campsite is just 100 metres from UKOG's proposed oil and gas well.

Our brewery, The Crafty Brewing Co. makes award winning beers, supplying local pubs, restaurants, Surrey Search and Rescue supporters, military regiments, and on-line customers.

We employ 12 full time and 42 part-time people. All local.

Trew Fields introduces £177,000 to the local economy. The brewery has sales approaching £1m.

We have diversified, creating employment, whilst retaining agricultural and artisan usage and are in compliance with Saved Policy R D 8, which states that "*Farm Diversification must not have an adverse effect on the character and amenity of the area*"

COVID may have damaged us but hydrocarbon drilling, in the field next to us, would be the final straw.

Trew Fields will become untenable and Crafty's Summer evening events will become less attractive.

And who can say with any certainty that the fresh-water borehole that we need to drill, our wells and ponds will not be at risk from contamination?

That we won't be subjected to noise and odour from the hydrocarbon well site?

The NPPF requires the weighing of "National economic benefit" against "local harm".

And, even if need **had** been demonstrated, the Surrey Minerals Plan, (MC 14), advises that

“if there are significant adverse impacts of mineral development on communities and the environment, permission should be refused”.

The Officers may recommend consent, but you have the right to differ. And, fear of an appeal is not a valid reason not to do so.

The NPPF and Minerals Plan frameworks, both provide valid, legal reasons for refusal and I would ask you to engage these

Consent to this Hydrocarbon well site and Tom's and my rural businesses, with a combined contribution of £4.5m to the local economy each year, will be crippled.

As a local resident living 900m east of the site, I wish to represent the huge number of local people directly threatened by the oil well's impact whose voices continue to be 'airbrushed out' both in scale and significance; Ashley referred to the community with Protected Characteristics whose most recent petition represented 140 residents, including children, against this application. They have at no point been directly consulted by the County Council. In total some 400 people live within 500m of the site, to which will soon be added thousands more at Dunsfold Garden Village. They will all be blighted by noise and pollution above ground and the well directly beneath them. Alfold, Cranleigh and neighbouring parishes, totalling over 15,000 people, and Waverley Borough Council have all strongly objected - the opposition to this is deafening, yet the Officers Report dismisses all concerns of harm, preferring to trust the word of the applicant. Today, Councillors, you can change that! Your decision is on a matter of *balance*. Take traffic safety and sustainability; any layman visiting High Loxley Lane can picture the risks of HGVs (including abnormal loads) attempting to use this narrow lane. Yet the response by Officers has been dismissive. Over several months despite being given factual evidence exposing flaws in the applicant's plans for accessibility, and questioning the use of banksmen to control HGVs at the 4-arm blind junction at Pratts Corner, the Council still has not updated its 2018 Road Safety Audit. The blind bends on the B2130 will force HGVs into the path of oncoming traffic, but Officers say these bends 'can be safely negotiated'. They contend it's acceptable to put off traffic matters until later. Facts show this to be a false and unsound premise. This is not the first time the Council has been misled by UKOG. A Traffic Management Plan approved by SCC in October for the Horse Hill drill site, was flouted just days later when an Abnormal Load vehicle was photographed overriding verges, and grounding on a busy road without any traffic management - evidence you have seen yourselves. Your Policy MC15 requires you, members, to satisfy yourselves that the highway network is of an 'appropriate standard for use by the traffic generated by the development' and if deficient that you have 'proposals for suitable improvement', yet you have seen no firm proposals to mitigate these very real risks. Using 'banksmen' is completely different to previous proposals and should have been subject to a full Road Safety Audit and draft section 278. But for five months since first being mentioned, the Council has preferred taking the word of the applicant to undertaking proper due diligence. Members, you cannot take this gamble. You should refuse this application on the grounds of both Policy MC12 and MC15 because '*vehicular activity and vehicle routeing*' have *not* been properly addressed and there *will* be significant adverse impacts on 'highway safety, residential amenity, the environment and the effective operation of the highway network'. Today you can choose to preserve our rural community, or to permit a speculative and harmful venture, with no demonstrable benefit.

Thank You.

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The application site, on the edge of the Surrey Hills AONB, is not strategic, offers very speculative volumes and will not balance the harm caused by these wells.

The site is not well located, no new data has been generated to justify the volume claims made by UKOG as against the knowledge gained from the Godley bridge and Alfold wells and the rebuttal evidence made by Dr Seaborne on 4th August and 27th October.

Dr Seaborne (a retired Oil & Gas professional) challenged the validity of the volumes and the way that UKOG, referred selectively, and used as evidence, an independent study by consultants Xodus. ,,,,,,,,,,,,,,,RNS is Regulatory News Service

.....Dr Seaborne wroteThe content of the UKOG Release is in stark contrast to Xodus 2018 Competent Persons Statement (Publicly available) which unequivocally stated that the mapping is not in accord with observed facts and that available data are insufficient to allow a recoverable reserve estimate to be made.

....Dr Seaborne went on to sayIn September 2020 we are told by UKOG that this has changed and we are looking at the second largest onshore UK gas accumulation. This assertion lacks supporting evidence in the form of public access to the Xodus report referred to.

UKOG plan to produce hydrogen – that is grey hydrogen – as distinct from Green. In Hydrogen from natural gas, the Carbon element has to be removed and stored and is more suitable for offshore rather than onshore well

UKOG claim the investment of £6m over the three-year period, will benefit the community, which in the absence of evidence, I contend will be mostly spent with specialised contractors outside Surrey. As against the impact on the two local businesses whose loss will impact for many years and conservatively will be 2-3 times the UKOG investment. Both local businesses have figures available to support this statement, however the officer has not included an impact assessment in his report.

UKOG application is already showing up on local searches – I had one in April for my Dunsfold purchase.

The application site overlooks – the Dunsfold garden village - of 1,800 houses (2,600 in plan), around 4,000 new residents. The success of this site is critical to the Waverley Local Plan and the need to show a five-year housing supply. Any impact to the building out of this

site will impact on the whole of Waverley and the success of the garden village with its many green credentials.

This application if approved will damage the local businesses, expose local residents to the impact from 24 hour operation of the well, will impose an industrial structure at the edge of the AONB and risk the success of the development at Dunsfold Park.

Any planning application is a balance and I urge you to see that the benefits of this speculative drilling do not outweigh the harm at a local nor national level and reject this application as you did on 29th June.

ASHLEY WARD PRESENTATION

Thank-you Mr Chairman and Members of the Planning Committee.

I am Ashley Ward, my family owns Farmers Direct Ltd and we farm at High Loxley along with other land in and around Dunsfold. Also, I own the land at the proposed well site.

We farm a lot of livestock and produce high quality beef and lambs which sell to a wide range of customers throughout the UK.

We are committed to Higher Tier stewardship with Natural England, enhancing the soil and biodiversity. I have Environmental Qualifications and 4 generations of my family have farmed here for over 100 years.

I consider we are a cornerstone of the rural economy.

Farming is challenged by Brexit and cheap food from anywhere in the world. It is also at the front edge of carbon management as we move forward to a low carbon future. Initiatives here on our farm, including the planting and management of miles of hedges and new trees are already helping to store carbon. Furthermore, our methods to increasing soil organic matter can directly equate to carbon sequestration into the soil.

UK Farming is acting on climate change and delivering our food security

UK Oil and Gas companies, embracing a hydrogen future and carbon capture storage will also be part of the solution in winning against climate change. We should be encouraging UKOG for their role in energy security and addressing a transition to a low carbon future alongside British farmers.

The roads to High Loxley are perfectly suitable for HGV's. I know this because the animals that go in and out of my farm do so on HGVs. The largest of which are as big as any vehicle legally permitted on our roads. Large HGVs come and go to my farm easily, without adverse effects on free flow or safety.

Our roads are suitable and it would be un-reasonable to claim otherwise.

This site is not going to destroy local businesses as some claim. I have worked with UKOG for over 3 years and they have been very good neighbours. They are supporting my business and our environment, this at the forefront of their agreement with me and this proposal. No other diversification on my land has the potential to bring so much investment and expenditure into the area.

Furthermore, just south of here is Pulborough Rugby club, the beautiful club house hosts hundreds of events and it's a great place to have a beer. Interestingly, about 100m from the club house is Storrington oil and gas well site. It's been there for about 30 years, pretty well un-noticed.

So, I say to my neighbours and other businesses, I'm pretty clear that UKOG do not pose the threats that you claim.

UKOG's application has complied with every aspect of planning and regulation. This proposal is a credit to their management and their professional team. SCC's own team of professionals recommend approval with good reason.

Chairman and members this application should be approved and I encourage you to approve it... here today
Thank you.

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NIGEL MOORE PRESENTATION

Good morning Mr Chair and Members of the Planning Committee - My name is Nigel Moore, I'm a Chartered Town Planner and part of the Loxley Design Team.

As you will know, in June, you were minded to refuse Loxley for 5 reasons.

The Applicant accepts without reservation the concerns expressed and I will now present the measures designed to remedy the situation and establish Loxley as a development worthy of your support.

Firstly, Members were not convinced of the need for gas exploration.

In response, there are two key pieces of information to consider:

- Firstly, historic exploration at Godley Bridge and Alfold in the 1980's confirmed the presence of gas.

It was not feasible to continue exploration at that time

but efficient drilling techniques make it viable today;

and secondly.

- The geology is the same as that at Horse Hill, a known discovery which is now being readied for production in the coming year to coincide with our economic recovery from Covid-19.

Having studied this evidence in detail the Applicant confirms that Loxley is a known reserve of domestic gas; but add to this evidence the following considerations;

- Exploration can't be footloose; similar to all other mineral development it must follow the resource;
- Exploration is a serious business; the planned expenditure is £6m and the search for gas is a matter of national importance - our national energy policy says it's "*critical*" (a word rarely used in policy documents) that we have access to domestic supplies ... because...

Gas is a key commodity for our manufacturing base and it heats our homes, hospitals and schools.

In short, we need gas now to keep the lights on but we'll also need it in the future given that the Committee on Climate Change predicts we'll still consume 70% of the gas we do today in the year 2050 when our Greenhouse Gas emissions will be Net-Zero.

The UK is currently a net importer of gas and if we do nothing, by 2050, we'd be dependent on the goodwill of other countries for 86% of our supply. This level of exposure would be unsustainable in planning terms and an unacceptable risk to our national security. Put simply, any interruption in supply would have a significant and adverse impact upon our national economy and social well-being.

Domestic gas is therefore the insurance policy we need to protect ourselves against any external threat to turn the taps off or spike the prices - but this historic economic concern has now been joined by a more pressing environmental concern - because the Liquefied Natural Gas we import from the United States, Russia and the Gulf has a greenhouse gas content 4 times higher than UK gas.

In summary; continued import dependency makes no sense... but it's worse than that

because it will actually harm our economy and our environment. Contrast this with an alternative future where sites like Loxley restore our gas sovereignty, secure our supplies and clean our supply chains.

Accordingly, Loxley is precisely the kind of site that should be explored given that gas is critical to our current and future prosperity.

Secondly, Members expressed Highway concerns

Planning conditions now dictate that:

- all HGV's will enter and exit the site from the east and avoid the rural road network to the west;
- they will be digitally tracked to ensure they stick to the route; and
- verges will be protected; junctions will be improved and wheels washed.

At the last Committee **Mr Gordon** spoke of the need for clear access to High Loxley Road on a Friday in connection with events at High Billingham Farm. In response, there will be no HGV movements from Friday-noon onwards leaving the long weekend free for Mr Gordon's activities.

Mr Herman has confirmed that the Trew Fields Cancer Festival will be held from the 2nd to the 4th of July in 2021. In response, the Applicant will cease operations during this time and commit to do the same in years 2 and 3.

Signage is in place to deter HGV's from using Marwick Lane as a rat-run but this is not meant to restrict HGV movements elsewhere. 934 HGV's use Dunsfold Road on weekly basis – so an additional 10 HGV's per day would not be material.

Speeding cars are the reason why **Chevrons** have been installed on bends.

There have been no accidents involving HGV's because Dunsfold Road is sufficiently wide to accommodate these vehicles.

Members expressed concerns for Noise and Air Emissions

Both have been the subject of independent assessment with which the Council's Environmental Health Officer agrees and the Environment Agency have already issued a Permit confirming that the environmental protection measures are acceptable.

Last but not least... in response to Members concern for the Rural Economy;

- the planned expenditure at Loxley is £6M and there are few other land-uses that result in this amount of inward investment into the rural economy;
- the environmental capital of the area will be enhanced with new trees, hedgerow and habitats; and
- local firms will be used where possible to ensure the maximum amount of spending is retained within the local economy.

In summary;

Conditions are in place to ensure the site operates as predicted but the Applicant is willing to accept further conditions if Members consider it necessary.

Members can be confident that this suite of conditions will work because of the well of trust built up at Horse Hill - a similar exploration site - operational since 2014 but with no breach of planning conditions.

Loxley would be sympathetically managed with the same spirit of goodwill and therefore there is no reason to doubt the same harmonious outcome – an outcome that all parties want.

In conclusion;

- UK gas is the cleanest gas & the cheapest gas - it makes no sense to keep shipping it in from afar
- If approved, Loxley would progress in full compliance with your Minerals Plan but it has the potential to do so much more
- because no longer must we choose between protecting the economy or protecting the environment - we can do both - Loxley would allow us to keep the lights on and cut our emissions without impoverishment or any loss of personal freedoms – in short, we can have our cake and eat it.

Thank you for listening.

Good morning Mr Chair, Members, Ladies and Gentlemen. My name is Stephen Sanderson and I'm the CEO of UK Oil & Gas, a Surrey company employing mostly local people, including myself, with the sole purpose of providing energy for Britain.

Firstly, be assured that like our activities at Horse Hill, Loxley gas appraisal would progress responsibly and in full compliance with your Minerals Plan and other regulators.

Before I start given some of the objections can I just clarify that this is a natural gas project.

Those of you who've seen Horse Hill and other similar sites will know that they are visually unobtrusive, have low lifetime traffic flows and are generally well below most residents' radar. Loxley also has a full Environment Agency permit which should provide comfort that the local environment will remain unharmed by this development, your Officers concur with this.

So, ladies and gentlemen, given our climate emergency, why do we need Loxley or any natural gas development? In a nutshell, because new technologies make natural gas a key part of the UK net-zero solution.

Natural gas has a critical future use as a feedstock to manufacture low-carbon hydrogen, which can be used to generate electricity to prevent power outages when wind turbines stand still, or the sun goes down on solar farms.

Low-Carbon hydrogen forms a key part of government energy strategy, as demonstrated by last week's ten point 'Green Industrial Revolution' plan, the Chancellor's National Infrastructure Statement on Wednesday, and last November's Written Ministerial Statement from the SoS for Business, Energy and Industrial Strategy. All establish the importance of natural gas as a hydrogen feedstock. I quote the SoS:

"The Committee on Climate Change predict that we will still consume almost 70% of the gas we consume today in 2050 under our net zero target as significant reductions across building, industry and power are offset by demand for gas to produce hydrogen. It is, therefore, critical that the UK continues to have good access to natural gas from both domestic and international markets."

As well as a feedstock for hydrogen manufacture, natural gas also provides a key source of available affordable energy to bridge the transitional-gap before low-carbon technologies are in place.

Domestic gas is also markedly better for Net Zero than imports, as Liquefied Natural Gas and long-distance pipeline imports have 4-5 times the greenhouse gas footprint. Imports also make no direct contribution to the economy via jobs or taxes and do not have the same security of supply.

By providing fuel for hydrogen manufacture, domestic gas fields such as Loxley, can, therefore, not only help meet Net Zero but as part of the 'Green Industrial Revolution' can help offset the £270 billion cost of the up to 86% import dependency to 2050, and help repay the £394 billion of Covid debt.

Therefore, there is a demonstrable need for domestic gas from Loxley.

As the second largest gas accumulation drilled and tested in the UK onshore, Loxley's potential peak gas supply would have an energy equivalent to power around 200,000 homes per year and provide up to £30 million/year in gas sales to hydrogen manufacture and carbon capture plants, all of which are likely to be situated in key industrial hubs, well outside of the Loxley rural area. Loxley could thus be a materially significant future contributor to the local and Surrey-wide revenue base and economy.

It should be no surprise that this proposal in this locality attracts objection, however, as pointed out by Ashley Ward, a 4th generation local farmer:

“No other diversification on my land has the potential to bring so much investment and expenditure into the area.”

Consequently, with your help, the area’s rural economy can be allowed to adapt and change to meet current needs and future challenges, rather than be simply preserved in aspic like a museum piece.

Loxley’s potential role in the low-carbon hydrogen future should therefore be considered in your decision. I also kindly remind you that National Planning Policy requires you as decision makers to give “*great weight*” to the benefits of such developments in recognition of the critical role gas plays in the nation’s current and future life. I reiterate that Loxley’s local economic contribution is potentially materially significant.

Your Officers’ thorough and balanced report also finds that the many further concessions and mitigations we’ve offered strengthens the case for your approval and that, by virtue of sensitive site selection and considerate site design, the environmental effects of Loxley are insignificant, temporary and reversible. In contrast Loxley’s local economic contribution is potentially materially significant.

In reaching a decision I therefore hope that any personal opinions and perceptions do not trump the professional judgement and conclusions of your highways and planning Officers.

Finally, please be as courageous as you are honest in your decision-making, please support Loxley to help secure gas for tomorrow’s hydrogen, help us contribute to net-zero so Loxley can become an integral part of the “build-back-better” future we and our children so desperately need.

Thank you.

You have already heard from 5 local residents. As the member for Waverley Eastern Villages, I wish to voice my concerns on behalf of all the other local residents including those soon to move into the Dunsfold Park garden village. Indeed, if this application is approved, the projected deliverability of the Dunsfold park garden Village, a development of up to 2600 homes, central to Waverley's Local Plan, is called into question.

I represent a rural division, where the value in people's lives is not measured in monetary terms, but in the beauty and tranquillity of the environment and the fresh air they breathe. While blessed with wonderful countryside, this area suffers from a lack of employment opportunities and many local businesses have been adversely affected by Covid 19. However, this is not some rural backwater, within it are strong communities which will be deeply affected by this development.

The impact on local residents is a key concern to me. I was surprised to discover prior to the June hearing that the adjacent gypsy and traveller community at Stovolds Hill and Lydia Park (about 340 people in total) had not been consulted; I am still more amazed to find out that 5 months on and they have still not been consulted. There is a farm, brewery and wedding and event venue very close to the site. The wedding venue alone, which relies on its unique location and uninterrupted views of the AONB generates at least £3.5m per year revenue for the wider local economy. The loss of this business will have a huge knock-on effect on the large number of small local businesses that service it. Furthermore there is a unique international cancer awareness festival which works to support the NHS, but will no longer be feasible in this part of the country if this development goes ahead. In summary, the effect on local residents and their businesses will be significant.

The site is adjacent to the Surrey Hills AONB, and whilst currently partly screened, much of this screening is from a wood due to be reduced under an approved forestry plan and an adjacent area of protected ancient woodland. There is an outstanding view from Hascombe Hill which will overlook the site. The site is in an AGLV location, which under Waverley Local Plan Policy RE3 is to be offered the same protection as that afforded to the AONB. The introduction of a highly visible industrial site would be severely detrimental to the landscape and enjoyment of the countryside.

The impact of large vehicles on rural roads cannot be underestimated. Councillors, what you are being asked to accept is a plan to allow access to the site by 50 ton articulated lorries swinging out into oncoming traffic coming round several blind corners on a notoriously fast B road. You are being asked to allow the applicant and officers to sort out the details of the traffic management after approval is granted. The sketchy outline involves temporary traffic lights at some times and a banksman with a sign at others. These arrangements have not been subject to a road safety audit and many highways professionals are unhappy with them, despite what is said by the highways officers.

In the end, councillors, your job is to weigh up the pros and cons of this application, but I put it to you that the known harm is greater than any benefit ever might be.

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From: [Eleanor Anstruther](#)
To: [MWCD Environment/ENV/SCC](#)
Subject: Fwd: Ashley Ward & Hascombe Estate - his letter to you of 14/9/2020 Ref: WA/2019/0796
Date: 24 November 2020 09:54:16

To whom it may concern,

Following on from the email thread below, I attach a copy of the letter I also sent to David Maxwell concerning the incorrect claims in the applicant's papers.

I also strongly object to this planning application in this physical and factual content.

Email sent to David Maxwell 11.11.20:

Dear David,

Further to my brother's email to you below, I stand by his experience of working with Ashley Ward by echoing the like of my own. Ashley's farming practice during his tenancy of my land left the pasture so depleted that I have had to set it aside to recover; soil, wildlife, grass and flower species, all suffered at his hands. On top of this, his roughshod approach to the community here in the park, meant I was regularly having to deal with neighbours upset by his lack of respect for their needs to be communicated with clearly, and a spike in bills due to our shared access roads being continually damaged. The end of his tenancy was also marred in bad feeling, things not cleared up and attempts by him to charge me for things he hadn't done.

As a result of this and his wider treatment of the community he is no longer welcome on my land, and neither do I trust him enough to work with him on anything again. Likewise as my brother states, I would strongly advise the Council against trusting any commitments Ashley makes in relation to Planning or other matters at High Loxley.

*At your disposal should you wish to discuss this further,
 Best wishes
 Eleanor*

Eleanor Anstruther
 Lodge Farm
 Park Hatch Estate

Begin forwarded message:

From: Toby Anstruther <[to \[REDACTED\]@m](#)>
Subject: Fwd: Ashley Ward & Hascombe Estate - his letter to you of 14/9/2020 Ref: WA/2019/0796
Date: 23 November 2020 at 15:38:08 GMT
To: "mwcd@surreycc.gov.uk" <mwcd@surreycc.gov.uk>

To whom it may concern.

I understand that the email below (originally sent 11/11/2020) is not yet shown as a registered objection to the above planning application.

The email was intended to set out to correct an incorrect claim in the applicant's papers.

As a matter of fact I also wish to object to this planning application as being inappropriate in this physical and factual context.

Thank you

Toby

Toby Anstruther
Hascombe Estate

Begin forwarded message:

From: Toby Anstruther
[REDACTED] m>
Subject: Re: Ashley Ward &
Hascombe Estate - his letter to
you of 14/9/2020
Date: 8 November 2020 at
14:58:00 GMT
To:
david.maxwell@surreycc.gov.uk
Cc: Andrew Kinnear
<[REDACTED]>,
Eleanor Anstruther
<[REDACTED]>

Dear David,

I have been forwarded a copy of Ashley Ward's (Farmers Direct) letter to you of 14th September, 2020. In it he speaks up the quality of his work when farming on the Hascombe Estate. I strongly disagree with this record of his farming on the Hascombe Estate.

I am the owner of the Hascombe Estate - and I copy my sister, Eleanor Anstruther, who lives at Lodge Farm and owns the land of what was the Park Hatch estate, opposite the proposed Loxley Well site.

Ashley was a farming tenant of mine on the Hascombe Estate for many years - he suggests 14 years and this is probably correct; I don't have the exact date of the start of his tenancies. Over that time his style of farming has been extremely commercial and extractive; he has extracted the maximum from the soil and left it in poor heart. My last correspondence with him concerned the need for him to clear up the considerable quantity of big-bale-silage wrapping plastic from the estate. He declined to do this or to pay for the cost of the clear-up. Since then he has fenced over a right-of-access which I have over his land at High Loxley.

In my own experience of doing business with Ashley Ward he has little or no concern for anything which is not of benefit to him and I do not trust him enough to work with him again on anything.

I would strongly advice the Council against trusting any commitments Ashley makes in relation to Planning or other

matters on his land at High Loxley.

I regret that I feel I should spell this this out so clearly; but I object strongly to his suggestion that his own record on the Hascombe Estate is a good one; it is not.

Please don't hesitate to contact me should you wish to discuss anything in this email. Please let me know if I need to copy this email to anyone else to get it on the record in relation to the oil well (or other) pending planning applications on High Loxley.

Yours, with kind regards

Toby

Toby Anstruther
Hascombe Estate

HAMBLEDON PARISH COUNCIL

Chairman: Councillor John Anderson

2 Farm Cottages, Combe Court Farm, Prestwick Lane, Chiddingfold, GU8 4XW

Tel: [REDACTED]

Email: clerkofhpc@hambledonparishcouncil.gov.uk

24th June 2020

David Maxwell
Planning Development Team
Surrey County Council
County Hall
Kingston-Upon-Thames
KT1 2DN

Dear Mr. Maxwell,

WA/2019/0796 - Construction, Operation and Decommissioning of well site for the exploration and appraisal of hydrocarbon minerals at High Loxley, Dunsfold, Surrey County Council reference; 2019/0072.

I am writing with regards to the above application; a copy of this letter has been sent to both Surrey County Council as the application is being determined by the County Council's Planning and Regulatory Committee, and Waverley Borough Council as our Local Planning Authority. Please consider this letter in addition to our letter dated 20th September 2019.

Hambledon Parish Council note that the site of the proposed drilling is located 3.4km from the Parish of Hambledon. Consequently, with the proximity of the proposed development, the impact of such a site would impede on residents within the Parish. Concerns raised include, but are not limited to:

- Air pollution caused by both the oil extraction and the supporting vehicles required to access the site and transport the product. This is further multiplied by the required felling of nearby woodland.
- Impact of light pollution in an area of 'Dark Sky', as recognised by the CPRE. The plans confirm that oil flares would be necessary.
- Insufficient detail to explain what the 'exploratory' nature of the drilling could result in, with the potential to expand the exploratory phase in to fracking; leading to well-documented seismic activity within a 30 mile radius of the site.

The site is situated within the Green Belt and AONB. By allowing development of such a site that carries large environmental and ecological impacts as well as unmitigable risks, it sets a dangerous precedence for the rural English countryside. Justification for the need to meet demand for oil falls short during unprecedented times low oil demand and collapsing future forecasts.

Government policy is contrary to such development to meet 2050 net zero carbon emission targets. Surrey County Council has declared a Climate Emergency since the application was submitted, and residents have overwhelmingly objected to the development.

Hambledon Parish Council is also continuing to object to the application on traffic grounds; we are concerned that there will be associated traffic using narrow and unsuitable lanes local to Hambledon, in particular Marwick and Salt Lanes, unless the proposed Traffic Management arrangements detailed in the Planning Transport Statement Loxley App8 are properly monitored and strictly enforced. Presently, we do not have confidence that the proposed Traffic Management arrangements are suitable for the site and surrounding villages.

There is still no statement in the above document to say how these arrangements will be properly monitored by UKOG. Hambledon Parish Council therefore requests that our concern is suitably addressed prior to granting any approval and that suitable amendments are incorporated within the documentation.

Based on the above points, Hambledon Parish Council **objects** to the application.

Yours sincerely,

Julie Flenley

Clerk to Hambledon Parish Council

CC. Waverley Borough Council

From: Mela Davidson [REDACTED] >
Sent: 28 August 2020 15:55
To: MWCD Environment/ENV/SCC <mwcd@surreycc.gov.uk>
Cc: consultation.planning@waverley.gov.uk; Victoria Young <victoria.young@surreycc.gov.uk>;
steve.williams@waverley.gov.uk
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

Sent from Yahoo Mail. [Get the app](#)

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From: Patrick Arthurs [REDACTED]
Sent: 25 November 2020 13:02
To: David Maxwell <david.maxwell@surreycc.gov.uk>
Subject: Loxley Oil Well - UKOG Application WA 2019/0796

David,

Ahead of the Committee meeting on Friday the local residents are concerned that the applicant has sought to justify the drilling operation as a farm diversification activity that would be supported by Policy RD8. As you will see from the policy RD8 below the diversification intended by the policy is other types of farming activity and no adverse affects would arise from the activity including highways safety and access considerations. The mining operation will be commercial in nature and it will have an adverse impact on the environment, landscape, highways and local businesses as set out in previous correspondence. As a result the proposed development will be contrary to the policy and is not supported by it.

Regards

Patrick

POLICY RD8 – Farm Diversification

.New uses on agricultural, forestry or horticultural holdings will be permitted where:-

- (a) agriculture, forestry or horticulture remains the principal or dominant use;
- (b) there is no conflict with the principal agricultural, forestry or horticultural use;
- (c) they are accompanied by supporting information e.g. a "Farm Plan";
- (d) the proposed development will not introduce an activity which will adversely affect the character or amenities of the area;
- (e) the proposed development will not be materially detrimental to the amenities or privacy of nearby properties;
- (f) existing farm buildings which are re-used meet the requirements of Policy RD7 above;
- (g) the amount of traffic likely to be generated would not prejudice highway safety or cause significant harm to the environmental character of country roads; and
- (h) satisfactory vehicular access can be achieved.

In the Green Belt, proposals which require new buildings will be considered in accordance with Policy C1.

In the Countryside beyond the Green Belt, new buildings will only be permitted where no suitable existing buildings are available and where the proposed buildings are small scale and unobtrusively located.

APD
Arthurs Planning and Development
Bines Farmhouse
Bines Road
Partridge Green
West Sussex RH13 8EQ

[REDACTED]
[REDACTED]

**WAVERLEY BOROUGH COUNCIL
CONSERVATIVE GROUP**

C/O The Council Offices
The Burys
Godalming
Surrey
GU7 1HR

Thursday 19th November 2020

Members of the Planning & Regulatory Committee
Surrey County Council

Dear Councillors

Letter of objection to UKOG application SCC Ref 2019/0072 and WA/2019/0976

On 15th June last the Waverley Conservative Group submitted a letter of objection to planning application WA/2019/0796 re a well for hydrocarbon minerals exploration near Dunsfold, which the Committee heard on 29th June 2020 and refused permission. Following SCC's decision to declare the results of that meeting to be void we write again, prior to the replacement hearing scheduled for 27th November 2020, to reiterate the objections raised in our original letter and to raise further concerns for the Committee to consider.

1. Purpose of the application

The weighting of strategic benefits in relation to national energy security from hydrocarbon production from this site would seem to be less than significant in comparison to the many disadvantages and harm.

2. The site location

The location is adjacent to the Surrey Hills AONB and whilst partly screened, this screening is from a wood due to be reduced under an approved forestry plan and an adjacent area of protected ancient woodland. There is an outstanding view from Hascombe hill which will overlook the site and well used footpaths down two sides of the proposed site. The introduction of a highly visible industrial site would be severely detrimental to the landscape and the enjoyment of the countryside.

3. Impact on Local residents

There are a number of properties near to the proposed site, including 7 grade II listed buildings and an important Gypsy and Travellers site of some 80 people at Lydia Park on Stovolds Hill. There is a farm, a brewery and a wedding and event site within a 500 m radius of the proposed site. There are two bridleways bordering the site, which are enjoyed by many local residents and visitors. The effect on these residents, and those expected to come to live in the new

garden village of Dunsfold Park, will be significant and it will also be detrimental to the local businesses.

4. Traffic and roads

The traffic impact, whilst low in numbers, will affect local traffic flow especially on the four way junction at Pratts Corner. Proposed 4/5 way traffic lights will have a significant disruption to traffic between Godalming and Dunsfold Park especially during the construction phase of Dunsfold Park. The road from Pratts corner to the A281 at the Nanhurst crossroads is narrow and has a number of blind bends and traffic will have to go over the centre line to navigate these blind bends. The Nanhurst junction will need to be changed to allow a 90deg turning of exceptional long vehicles by removing the centre island to allow vehicles to cross the carriageway on this busy road and junction. The rural local and unclassified roads leading to the proposed site are unsuitable for the size of vehicles needed to build and operate the proposed site.

5. Financial Impact

Concern is expressed over the applicant's lack of financial strength, particularly relating to the significant cost of any remedial work needed if the company should fail. No bond has been offered or called for by the planners leaving the County exposed to the costs of remedial work should UKOG fail financially.

In addition to our previous objections also we ask you to consider the following:

6. UKOG has repeatedly asserted the presence of large volumes of gas in the Portland reservoir, and the consequent capacity to supply energy to large numbers of homes. They also talk about converting gas to hydrogen. We are not aware of any material in the public domain to substantiate those claims, but we are aware that maps of the structure published on UKOG's website do not honour the available data and are thus unreliable and will lead to inflated gas volumes.
7. The Loxley well is planned to be deviated under the Dunsfold Aerodrome. This is the site the major Dunsfold Park garden village development, critical to Waverley's future housing supply. We are seriously concerned about the potential impact on the developers' ability to sell houses on the site if and when a natural gas development starts to show up on pre-purchase searches.

We would ask you to carefully consider the impact and risks of the application in this rural part of south east Surrey, including the impact and risk from the future stimulated and unconventional production of any hydrocarbons found on the current and planned residents, on the local economy and businesses, and on the protected AONB landscape.

We thank you for taking the time to read this letter and would very strongly urge that you refuse permission for this planning application for the reasons outlined above.

Yours sincerely,

All Members of the Waverley Borough Council Conservative Group :

CLlr Julia Potts	Leader Waverley Conservative Group	Frensham Dockenfield & Tilford
CLlr Brian Adams	Frensham Dockenfield & Tilford	
CLlr Carole Cockburn	Farnham Bourne	
CLlr Steve Cosser	Godalming Charterhouse	
CLlr Kevin Deanus	Alfold, Cranleigh Rural & Ellens Green	
CLlr Simon Dear	Haslemere East & Grayswood	
CLlr Patricia Ellis	Cranleigh West	
CLlr David Else	Elstead, Brook & Thursley	
CLlr Jenny Else	Elstead, Brook & Thursley	
CLlr Jan Floyd- Dounlass	Witley & Hambledon	
CLlr Mary Foryszewski	Cranleigh East	
CLlr Michael Goodridge MBE	Blackheath & Wonnesh	
CLlr John Gray	Chiddingfold& Dunsfold	
CLlr Val Henry	Ewhurst	
CLlr Chris Howard	Shamley Green & Cranleigh North	
CLlr Peter Isherwood	Hindhead	
CLlr Anna James	Chiddingfold& Dunsfold	
CLlr Robert Knowles	Haslemere East & Grayswood	
CLlr Peter Martin	Godalming Holloway	
CLlr Stephen Mulliner	Haslemere East & Grayswood	
CLlr Trevor Sadler	Witley & Hambledon	
CLlr Richard Seaborne	Bramley, Busbridge & Hascombe	

Leader of the Waverley Conservative Group, CLlr Julia Potts.

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Cc

David Maxwell, SCC Case Officer
 Councillor Victoria Young, Local Division Councillor
 Ross Pike, SCC Committee Manager
 Joss Butler, SCC Committee Manager

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