



The Rt Hon Angela Rayner MP
Secretary of State for Housing, Communities and Local Government
Ministry of Housing, Communities and Local Government
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CC The Rt Hon Ed Miliband, Secretary of State for Energy Security and Net Zero
CC The Rt Hon Steve Reed, Secretary of State for Environment, Food and Rural Affairs

Our Ref: CC01025

22 July 2025

Re: Finch vs Surrey County Council and the Horse Hill Oil Field

Dear Angela Rayner,

I am writing to seek clarification on the UK Government's position and intended response following the recent Supreme Court ruling in *R (Finch) v Surrey County Council*, a judgment with far-reaching implications for the planning system, environmental governance, and the UK's climate commitments.

As you will be aware, the Court ruled that downstream greenhouse gas emissions must be included as part of the Environmental Impact Assessment (EIA) process. This ruling not only sets an important legal precedent but also raises urgent questions about how environmental impacts are assessed and how nationally and locally determined planning decisions align with our legally binding carbon budgets and Net Zero Strategy.

In light of this ruling, I would be grateful for your responses to the following key questions:

- How does the Government plan to address fossil fuel developments that have already received planning permission without fully considering downstream emissions?
- What resources, training, or technical support will the Government provide to help Local Planning Authorities (LPAs) implement the expanded EIA obligations effectively and consistently?
- Are there plans to develop a centralised approach or toolkit for calculating and evaluating downstream emissions?
- Will the Government mandate disclosure of downstream emissions data for fossil fuel developments that have already received planning permission?

Concerns Regarding the Horse Hill Oil Field and Restoration Obligations

Constituents have raised concerns about the financial viability of United Kingdom Oil & Gas (UKOG), the operator of the Horse Hill Oil Field, and the risk that restoration obligations may not be met if the operator faces financial difficulties.

There have been recent cases where restoration deadlines for onshore sites have been missed, and enforcement action by local authorities has been slow or subject to negotiation – an outcome I fear for the Horse Hill Oil Field. As such, I would be grateful if you would consider the following actions:

- Amending legislation to allow for the retention of restoration liability by past onshore licensees, as is the case offshore, to prevent the public from bearing the cost should current operators default.
- Strengthen restoration bonds or financial guarantees for onshore sites, ensuring that sufficient funds are always available for full site restoration, regardless of the operator's financial status.
- Ensure that local authorities have the necessary resources and legal backing to enforce restoration and aftercare requirements promptly and effectively, particularly when operators default or cease trading.

Given the government's recent decision to cease the issuing of new onshore oil and gas licences, attention must now turn to ensuring that existing sites are properly decommissioned and restored. Stronger enforcement mechanisms and legislative reform are essential to avoiding long-term environmental harm and financial liabilities falling to local taxpayers.

I would be grateful for your views on these matters and clarity on what specific steps the Government intends to take in response to the Finch ruling and the ongoing risks at onshore extraction sites such as Horse Hill.

Yours sincerely,



Chris Coghlan
Liberal Democrat MP for Dorking & Horley