Hampshire Minerals and Waste Plan – Partial Update
Response from the Weald Action Group

Thank you for the opportunity to respond to this draft plan. We are commenting on Policy 24: Oil and Gas Development and the associated information.

We welcome the consideration given to the Hampshire Council declaration of a climate emergency. However, we do feel that some statements within the plan are not always compatible with the emergency that we all are facing. We recognize that the requirements of climate change mitigation and minerals production often conflict with each other and can be difficult to reconcile. However, this plan commits the Hampshire County Council (HCC) to approving planning applications for years to come. Any new oil and gas developments during the lifetime of the Minerals Plan are likely to be still in operation by 2050, our target year for net Zero. We are already experiencing more extreme weather conditions, with both social and economic consequences, and these are predicted to increase. Our young people are increasing suffering mental health issues because of climate anxiety[1]. This plan has to take proper account of future extremes, and the social and financial consequences that we all face.

Paragraph 6.112

This states that "there is a continuing need for these minerals in the foreseeable future……(but) the use of these is likely to change". It is true we will be using **some** oil and gas by the Net Zero target year of 2050. However, our consumption needs to reduce speedily and significantly. We are legally required to reduce our emissions by 68%[2] (in comparison to 1990 levels) by 2030. **This is in less than six years!** The paragraph implies that we need to keep producing yet ever more oil and gas. However, our climate targets and the recommendations of agencies like the Committee on Climate Change (CCC) and the International Energy Agency[3] (IEA) are that we should not be drilling for new sources of oil and gas at all. Fatih Birol, one of the world's foremost energy economists and Executive director of the International Energy Agency, said in 2021: "If governments are serious about the climate crisis, there can be no new investments in oil, gas and coal from now – from this year". Instead, we should be working to rapidly reduce demand and increase our capacity for renewable energy.

For this reason, we would welcome a commitment to refuse any applications for new drilling within the county. The remainder of the plan should then concentrate on issues such as gas storage.

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[1] https://mentalhealth-uk.org/blog/what-is-climate-anxiety-and-what-can-we-do-about-it/
[2] https://www.theccc.org.uk/uk-action-on-climate-change/progress-snapshot/
[3] https://www.theguardian.com/environment/2021/may/18/no-new-investment-in-fossil-fuels-demands-top-energy-economist

We realise that this authority is unlikely to make such a radical, if necessary, commitment. However, we would at least like to see this policy showing an honest acknowledgement that demand for oil and gas is due to **reduce** in the coming years.

Paragraph 6.114
We consider this paragraph misleading. It acknowledges that onshore oil and gas is a relatively small proportion of UK production but claims "it makes an important contribution to supply". In 2023, a year when onshore production was higher than previous years, onshore oil amounted to just under 2% of UK oil and just under 1.2% of gas production[4]. Over three quarters of on-shore oil production came from one site, Wytch Farm in Dorset. Hampshire sites contribute relatively small amounts. For instance, the oil produced at Humbly Grove, only amounts to 0.013% of UK production. It is likely that any new production sites would produce similar small amounts. 0.013% is a contribution to national supply, but is hardly an important one. (The story for gas production is similar, with one site, Saltfleetby in Lincolnshire, producing nearly 80% of onshore gas.) The 2020 Energy White Paper[5] reflects this in that it barely mentions onshore gas and oil, other than to comment that the "vast majority of UK gas and oil is from off-shore production sites.

This paragraph also claims that "it has the added advantage of proximity to demand and markets". **This is untrue**. Oil produced in Hampshire is stored and then much of it is exported from Hamble "by ship, every ten days"[6]. The UK imports and exports both oil and gas[7]. (Although the gas we export is largely imported LNG that has undergone regasification and is then sent by pipeline to the European continent) The best one can claim is that any locally produced oil will join our stock of crude oil, **some** of which will be refined in the UK and **some** of those refined products will be used in the UK, but others will be exported. Some of the crude oil stocks will also be exported.

This is important. Misleading statements about the importance of new onshore oil and gas, can lull councillors, who need to decide on planning approvals, into thinking that a new oil and gas development in the county is somehow a more sustainable alternative. It is not. Hampshire oil is as likely to be burned in China as it is in Hampshire.

Paragraph 6.117
We would like to see some clarification on this paragraph. It acknowledges that fossil fuels contribute to climate change, but this is simply a statement and does not address reducing or mitigating this harm, as is required in Policy 2. The statement "It is expected that these potential downstream impacts of the development are fully assessed, either separately or as part of an environmental assessment" is misleading. Downstream impacts include activities

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[4] https://drillordrop.com/2023/09/04/uk-onshore-oil-and-gas-production-in-charts-june-2023/#more-100832

[5] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945899/201216_BEIS_EWP_Command_Paper_Accessible.pdf

[6] http://www.solentforum.org/solent/our_economy_and_industries/petrochemical_industry/

[7] https://www.ons.gov.uk/economy/nationalaccounts/balanceofpayments/articles/trendsinukimportsandexportsoffuels/2022-06-29

such as refining and marketing crude oil products. These take place in refineries that received their planning permissions years ago. Are there provisions for these refineries to undergo new and regular assessment? If not, then this paragraph is misleading and should be removed. It amounts to empty words and greenwash.

The majority of the emissions from fossil fuel arise further downstream from the burning of oil and gas. The emissions arising from these can be calculated, but as these are sold in the global market any possible mitigation measures will be beyond the remit of any such assessment by the planning authority.

Paragraph 6.120

This paragraph considers the impacts of the various stages of oil and gas exploration and production.

We note that some stages are considered temporary, but we know that periods as long as 25 years have been considered temporary in planning decisions. Broadford Bridge, a site in West Sussex, had planning permission in 2013, and has had a well site since 2014, with the actual drilling starting in 2017. Although no oil has been produced at this site the permission has been extended four times and the oil company is now applying for a fifth extension; that is ten years so far. Consequently, we view the use of the terms “brief” and “temporary” with some caution.

This paragraph also acknowledges that drilling will have adverse visual impacts as well as noise and light disturbance. It is very worrying that the impact on roads and on archaeological sites are specifically mentioned, but not the impacts on people and wildlife. We consider that a full Environmental Impact Assessment (EIA) should be an essential component of any such planning application, and should be specifically listed as a requirement alongside the more general “full appraisal programme”.

Paragraph 6.121

This paragraph considers the infrastructure required for oil and gas production, including gas flaring. Both oil and gas produce waste gas, mostly methane. This is either vented directly into the air, or it is burned in a flare. Methane is a particularly potent greenhouse gas that has 80 times the warming potential of carbon dioxide over a twenty-year period. We would like a provision within the plan that bans venting. We would also like a provision for companies to use this waste gas rather than flare (ie. waste) this gas. We note that off-shore oil and gas is legally committed to Zero Routine Flaring by 2030.

Oil and gas production sites also release methane in effusive emissions. This is where the gas escapes at various stages of production. This can be kept to a minimum by good monitoring and maintenance practices. We would like to see a commitment to these within this Minerals Plan. We would want regular monthly monitoring and a commitment to deal with any sources of effusive emissions within a matter of weeks. This would be in keeping with Policy 2: Climate Change-Mitigation and adaptation.

This is a link to a film of emissions at one of the Horndean sites.
https://www.youtube.com/watch?v=V2CUGDIJFIs&list=PLKH65C8nX1i9h0kDoOKLNvjtu278jUzfo&index=8
In this link you can see extensive venting of methane at Larkwhistle.

https://www.youtube.com/watch?v=FAYFfXP6-lo&list=PLKH65C8nX1i9h0kDoOKLNvjtu278jUzfo&index=10

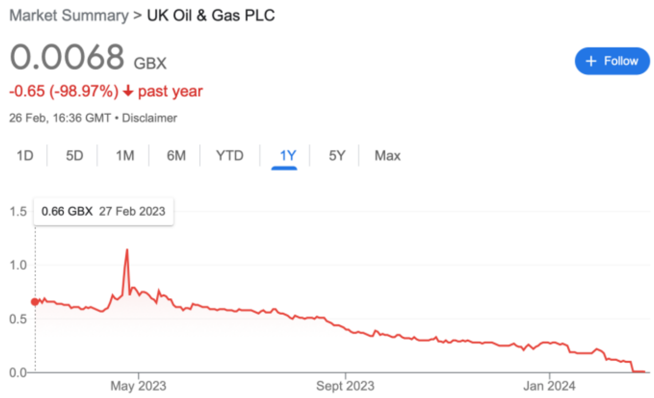
Paragraph 6.122
We find it very worrying that this proposed plan still would allow proposals to drill in the National Parks to be considered. As stated previously, we would rather that no new drilling be permitted, but in the light of both the climate and ecological emergencies, the predicted reduction in the use of fossil fuels and the relatively small contribution that onshore production makes to national supply, we consider that drilling in our most precious landscapes should not be permitted in any circumstances.

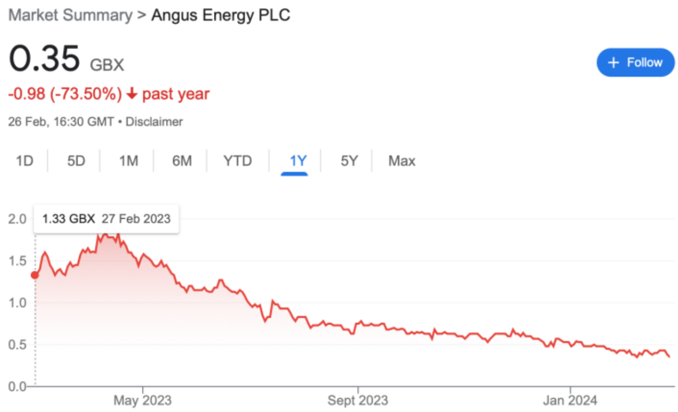
Paragraph 6.123
This paragraph should make it clear that unconventional oil and gas activity, ie fracking, is not permitted in the UK at present, because it is associated with earthquake activity. Fracking is also a process that can have especially harmful effects on the health of nearby communities and the local environment. It is energy-intensive, and as it creates particularly high climate changing emissions so is also incompatible with Hampshire's climate emergency declaration and Policy 2. We consider this Mineral Plan should commit to never allowing fracking in Hampshire.

Paragraph 6.124
We welcome the fact that the plan includes an option to require site restoration at the end of each stage. As stated in Paragraph 6.120, our experience is that oil companies will delay restoration when they can. Broadford Bridge, as stated earlier, is an example of this. Another is Markwells Wood in West Sussex where the South Downs National Park Authority had to issue two Breach of Condition notices[8] before the company finally restored the site. Site restoration is very expensive and we are concerned that on-shore companies can be financially stretched. If companies don't have the funds to restore a site, the cost will fall to the landowner, and failing that, to the local authority. This is a realistic concern. Two of the companies with sites in the south of England are UK Oil and Gas (UKOG) and Angus Energy. Their falling share prices over the last year are an indication of their financial instability.

UKOG	share price 0.0068 pence	-98.97% fall
Angus Energy	share price 0.35 pence	-73.50% fall.

[8] https://drillordrop.com/2018/03/16/oil-company-ordered-to-restore-south-downs-drilling-site/





We consider this Minerals Plan should include a requirement to assess the financial stability of a company and where there are concerns about this HCC should have an option to require a bond to cover the cost of restoration.

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This Weald Action Group is an umbrella group for local groups campaigning against all forms of extreme extraction of oil and gas across the Weald and Isle of Wight in the South East of England.

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