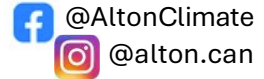




Alton Climate Action Network

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Response to the planning application: HCC/2024/0538

Regarding: Humbly Grove Oilfield, The Avenue, Lasham, Hampshire GU34 5SY

Applicant: Humbly Grove Energy Limited

Proposal: Variation of Conditions 1 (Exportation of oil by tanker) and 17 (Removal of plant, buildings, structures, hard standings and haul roads) of Planning Permission 17/01340/HCC

Introduction

Our main objection to this planning application is the time scale. The previous government was working towards becoming carbon neutral by 2050 and we now have a new government which has already set a new target of 78% reduction in emissions, compared to pre-industrial levels, by 2035 and will be introducing new policies to meet that objective.

Global warming is progressing more rapidly than has been planned for and current measures are not having sufficient impact. It is clear, with the announcement that 2024 was the hottest year on record, (with average global temperatures exceeding the 1.5 degrees limit set at the 2015 COP and some places experiencing temperature spikes above 2 degrees), that we need to take stronger actions to reduce emissions and increase carbon capture with tree planting and re-wilding schemes wherever practicable.

Against this backdrop we feel it is unwise for HCC to grant this application for the full 30 years requested as this will reduce the council's options and ability to respond flexibly to the fast-changing climate landscape.

Specific Points

Material consideration

Climate change is a 'material consideration' as defined in the planning procedures and is a significant reason to limit the duration of the Humbly Grove operation. See extracts below:

Section 3: Needs and Benefits

- '3.1.1 Applications for planning permission are required to be determined against the policies of the Development Plan unless material considerations indicate otherwise.'

We believe that climate change is a material consideration particularly as the planning application teaches us that:

- '4.2.10 The scope of what may constitute a material consideration is **very wide** and has come to be defined by case law. In general, the courts have taken the view that a material planning consideration is one that is relevant to making the planning decision in question, but that planning is concerned with land use in the public interest.'



We submit that agreeing this application for 30 years incurs a great risk of not using the land for the public interest and that policy changes in climate change might require significant changes and possibly the closure of the Humbly Grove operation. HCC needs to maintain flexibility in the future to respond to these changes. In practice a better use of the land, more in keeping with the public interest, might be to increase biodiversity on it or increase carbon capture by the planting of trees in the future, than to maintain oil and gas production. Furthermore, despite the comments to the contrary in the application it is not a foregone conclusion that natural gas and oil will be part of the net zero policies. We draw your attention to an article in the Financial Times January 21, 2024, that states:

‘.....gas network owners face uncertainty as ministers plan to ditch methane or natural gas for home heating as a key objective to reach net zero by 2050.’

We further note that the majority, if not all, the references cited in this section 3 and 4 predate the Financial Times article.

Below we cite the application again:

- 3.2.3 In order to deliver net zero the country needs to wean itself off fossil fuels as its primary source of power and heating. However, net zero does not mean that the UK will no longer burn fossil fuels, rather that any emissions generated will be offset by the capture, use and storage of carbon emissions so that they will not be released unabated into the atmosphere; or the planting of trees or other measures are implemented so that additional emissions are cumulatively net neutral.

This clause supports the view that the need for Humbly Grove’s operations is not as clear cut into the future as being presented. Again, we counsel HCC to bear this in mind and take a pragmatic approach to extending the lifetime of their operations. We will be weaning off fossil fuels at a pace that will be dictated by new policy as well as technical data on the progression of climate change. This application concerns an oil well and, however the owners might wish to suggest otherwise, it is in the business of fossil fuel production and these businesses will be increasingly monitored and affected going forward.

Further support for policy change is contained in Clause 3.2.6 where the application states that

“to date the new Labour government has not published any policy or strategy in terms of onshore oil and gas.”

Although Humbly Grove Energy Ltd wishes to surround this comment with ‘positivity’ for its cause the fact remains that the future is not clear for their business sector.

The Climate Change Act

The National Planning Policy Framework (NPPF) states that planning applications need to be decided with due deference to the Climate Change Act.

It also states that the purpose of the planning system is to contribute to the achievement of sustainable development, which at a high level can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.



We submit that a lot can, and almost certainly will, change with regard to both the law and the ravages of climate change over 30 years. We suggest that such factors mean agreeing to this application would make it much harder for HCC to respond with flexibility to the fast-changing climate landscape.

It is worth remembering that the Supreme Court ruled [in June 2024] that Surrey County Council acted unlawfully by granting planning permission for oil production at Horse Hill in the Surrey countryside without considering the climate impact when the oil is burned see: (https://x.com/friends_earth/status/1803718581168824326). We must assume that the same rule would apply to the Humbly Grove application.

Conclusion

Hampshire County Council is committed to addressing the climate crisis and, following the declaration that 2024 was the hottest year on record, must be aware that changes to climate policy are extremely likely to occur in the next few years. We therefore submit that for HCC to sanction any more than a 5-year extension of operations at Humbly Grove is irresponsible and ill advised.