

Our late contribution

We remain concerned that we were not notified of this application in the usual way and would have remained unaware had we not discovered it by chance (and we note that the LA has been unable to supply any evidence that we were notified). We were similarly not notified of the 2023 application regarding the generators, due to that application being considered – incorrectly, we feel – to be ‘non-material’.

Given a small extension of the time to comment, we have studied this latest application and supporting documentation and held a hurriedly convened public meeting; however, we find that the application raises more questions than it answers.

One step forward..

On the face of it, this proposal appears relatively modest and eminently sensible, enabling the conversion of otherwise wasted methane gas emissions into useful electrical energy. Indeed, we note that permission to do this was originally granted in 2010, but has never been implemented – due to ‘economic reasons’ – leading to massive quantities of methane having been either burned on site or released into the atmosphere over the years.

Two steps backwards..?

However, there was considerable concern raised at the meeting that this appears to be one of several applications, each being modest in itself, but between them constituting a much larger project to further develop the site: a practice referred to as ‘salami-slicing’. In particular, the generators (previously approved) couldn’t be used without the cable; and the cable can’t be used without a (yet to be designed..?) connection to the substation at Midhurst, nearly 5 miles to the north.

So generating electricity on the site and supplying it to the grid is clearly a major project; and the apparently unnecessary 16 month delay between the application for the generators in August 2023 and this latest application for the cable, suggests that there’s no great hurry to implement these permissions. Which raises the question: why then make the applications? And what further applications might be forthcoming in the future that refer back to these (as this latest one refers back to the last)?

And to the crux of the matter: with less than seven years before the licence and planning consents for the site expire, are these applications simply part of the larger project to extend the existing permissions?

The bridge to nowhere

In February 2023, in the case of [*The King \(on the application of Ashchurch Rural Parish Council\) and Tewksbury Borough Council*](#), the Court of Appeal considered an application to build a bridge over a railway line; on the other side was nothing except land that had development potential, but as yet no application had been made to develop it. The Court ruled that Tewksbury Borough Council was wrong to consider the bridge in isolation, because without the further development it was a 'bridge to nowhere'; furthermore, that it was necessary to consider the environmental impact of the entire project of which the bridge was just part – including the housing development on the other side.

At the heart of the case was the fact that, by 'salami-slicing' in this way, the applications avoided the provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 – and that it was in fact necessary first to identify 'the project' of which these applications form part and then consider the environmental impact of the entire project.

In our view, the proposed cable bears more than a passing resemblance to the 'bridge to nowhere': it's the 'cable to nowhere'. We therefore believe that the Court of Appeal ruling in the Tewksbury case applies here, requiring firstly that the entire project be identified and secondly that a full Environmental Impact Assessment be produced for that project.

A trolley full of salami...

The planning history of the oil well site reads like a shopping list of ingredients for a bumper feast: each item presented as small or 'non-material' in itself – thus largely slipping beneath the radar – while together representing a major environmental cost in total; except that the full trolley is never presented at the checkout and the full environmental cost is never tallied up.

We believe that now – particularly given the impending expiry of the existing licence and permissions – is the time to check out the environmental impact of the entire project, both past and future. And to ask whether, at a time when we're supposed to be dramatically cutting back on greenhouse gas emissions and obliged by law to aim for carbon neutrality, can it really be right to continue to pump for ever diminishing oil reserves, with the risk (notwithstanding the proposed generators) of ever more uncontrolled methane gas emissions, in the heart of an otherwise tranquil ancient woodland within a national park?

More questions

Many questions arose at the public meeting that appear to remain unanswered by the documentation:

- Given that the site first had permission to export electricity to the grid in 1993, with subsequent permissions for larger generators in 2010 and 2016, just how much electricity, if any, has in fact been exported to the grid over the years?
- When the generator application in August 2023 stated, '*Connection to the grid will be via a new larger underground export cable replacing the existing*', it would have been clear that a further application would be necessary before the generators could be used. Why then, in the light of the earlier Court of Appeal ruling in the Tewkesbury bridge case, was that application accepted as 'non-material' under s96 of the Town and Country Planning Act 1990 and considered in isolation, thus avoiding wider consultation? Is this not a perfect example of 'salami-slicing' and its objective?
- What proportion of the total methane currently emitted will be used in powering the generators on the site and what will happen to the rest?
- Does the national grid (from its expected connection at Midhurst) have the capacity to accept the amount of power proposed to be supplied by the site? And if there will be times when it cannot, presumably it would be necessary to reduce the level of power generated, in which case, what will happen to the methane that is not then being used?
- Given the previous reports of uncontrolled methane gas leaks, does the proposal to generate electricity on-site, with the attendant risk of gas leaks near to high voltage electrical equipment, create any additional fire and/or explosion risk? Has anyone properly assessed this?
- As the generators will produce power by burning fossil fuel, will they materially reduce in CO² emissions when compared to burning it using the existing flares?
- We see from the generator application that noise level tests were carried out at nearby properties. However, bearing in mind that in still conditions, the forest is normally totally silent at night – and that on a still winter's night, when all the deciduous trees have lost their leaves, sound can carry vast distances – would it not be appropriate to prepare a full noise impact assessment to properly consider the impact of this project on the overall tranquillity of the forest and surrounding parkland?

- Given the limited resources of the Environment Agency and pressure they are coming under from all quarters, not least the water industry, is there not a risk that, with this site's contribution to UK energy supplies being so small in relation to other sites, the EA will tend to focus its scarce resources on larger sites, resulting in sub-optimal monitoring at Singleton?

South Downs Local Plan 2014-33

Core Policy SD1 of the South Downs Local Plan 2014-33 states:

"2. The National Park purposes are i) to conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and ii) to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. Where it appears that there is a conflict between the National Park purposes, greater weight will be attached to the first of those purposes."

All things considered, in the current environmental (and meteorological) climate, it seems highly unlikely that, if the oil well did not exist, it would today be permitted. While we would support anything that materially reduces methane emissions during the remaining life of the well, we see nothing in these proposals to demonstrate that this scheme is economically viable or even practically possible to implement before the licence expires in 2031; and with closure and subsequent decommissioning of the site a real possibility in 2031, we feel the South Downs National Park Authority needs to be taking a closer look at planning proposals that appear, on the face of it, designed to perpetuate the oil well's existence.

We therefore urge the SDNPA to take a much closer interest in all of this, to implement the Court of Appeal ruling in *The King (on the application of Ashchurch Rural Parish Council) and Tewksbury Borough Council* and to ask all the pertinent questions and obtain all the relevant information in order to reach a properly informed decision on the wider project behind this application.

Singleton & Charlton Parish Council

11th March 2025