*PeCAN response to Hampshire Minerals and Waste Plan - Partial Update, Regulation 18 Draft Plan Consultation, submitted 31 January 2023*

*Consultation documents are at: https://www.hants.gov.uk/landplanningandenvironment/strategic-planning/hampshire-minerals-waste-plan/minerals-waste-plan-partial-update-consultation*

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| **HMWP Partial Update Regulation 18 Draft Plan Consultation Response** |

**Document and section that you are responding to:**

**Sections 6.119 and 6.120.**

**Into which of the following categories does your representation fall?**

[ ]  Support

[ ]  No view either way

[x]  Objection

**If your comment is in support of the above-named item, please explain your reasons for this:**

**An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions on the Tests of Soundness, please refer to Q11 & Q12 of the FAQs, which can be found at** www.hants.gov.uk/minerals-waste-update.
*Please tick all that apply*

[ ]  Not complying with legal requirements / the duty to co-operate

[x]  Not meeting the Test of Soundness

**If you are objecting on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails?** *Please tick all that apply*

[x]  The positively prepared test

[x]  The justification test

[ ]  The effectiveness test

[ ]  The test of consistency with national policy

**If you are objecting on the grounds that it does not meet the Test of Soundness, please include below your comments on how it does not meet the Test of Soundness:**

***New fossil fuels are not compatible with climate safety and are therefore a risk to public safety.***

***There is a large consensus across all published studies that developing new oil and gas fields is incompatible with the 1.5C target, according to the International Institute for Sustainable Development.***

***The International Energy Agency has written that, “There is no need for investment in new fossil fuel supply in our net zero pathway”, in its landmark report, Net Zero by 2050.***

***Existing proven global fossil fuel reserves contain 3600 gigatons of CO2, more than ten times the 300 gigatons remaining in the global “carbon budget”, which measures how much carbon dioxide we can put in the atmosphere before we go above 1.5 degrees, according to Carbon Tracker international. In a 1.5 degree world, that means up to 90% of existing known fossil fuel reserves must stay in the ground and any new fossil fuel discoveries could only be burned if the owner of an existing reserve agrees not to fully exploit it. It is not reasonable to expect any other party to curtail their extraction and exploitation of existing reserves in order to facilitate new extraction in Hampshire.***

***Developing new oil and gas fields will slow the UK’s transition away from fossil fuels, which in turn will add to the UK’s energy security risks and prolong the UK’s future exposure to volatile energy prices.***

***We endorse the following comments already submitted by WinACC:***

***Given our separate comments in Response 4, it is clear that an appropriate course of action is to disallow any future extraction of oil and gas from Hampshire, whether under new or existing licences. After all, Hampshire is not known to be sitting on a large oil or gas field – it is not the North Sea nor is it Qatar.***

***Section 6.119 states that “Proposals for exploration and appraisal will be favourably considered where suitable safeguards are put in place to protect the environment and local amenity”. A more appropriate policy would be to disallow all future exploration and appraisal activities because of their potential impacts on global heating (see remarks in Response 4 on Section 6.118).***

***Section 6.120 states “Production will only be acceptable where any adverse impacts can be sufficiently mitigated.” Adverse impacts of combustion of oil and gas cannot be mitigated and therefore any proposed new production of oil or gas should be disallowed.***

**Are you seeking a change to this section?**

[x]  Yes

[ ]  No

**If you are seeking a change to the above section, what change are you seeking and why?**

***For the reasons given above Sections 6.119 and 6.120 should be combined to read:***

***“All future exploration and appraisal activities In Hampshire will be disallowed because of their potential but undeniable impacts on global heating. The adverse impacts of the combustion of oil and gas cannot be mitigated and therefore any proposed new production of oil or gas in Hampshire should be disallowed”.***

**Do you have any further comments on this section?**

***No***