

ANDREW TYRIE MP



HOUSE OF COMMONS
LONDON SW1A 0AA

Miss Lucy Harding
Minerals and Waste Planning Officer
South Downs National Park Authority
Rosemary's Parlour
North Street
Midhurst
GU29 9SB

11th February 2014

Dear Miss Harding,

Ref: SNDP/13/05896/CM

Celtique Energie has made a planning application for the installation of a well and associated infrastructure, including access road and soil bunds, for the drilling of a vertical borehole and contingent horizontal borehole from the same well for the exploration, testing and evaluation of hydrocarbons for a temporary period of three years. This is at Nine Acre Copse, Vann Road, Linchmere, West Sussex, in the constituency which I represent.

This application has caused great concern to some of my constituents and it is vital that their voices are heard.

The National Planning Policy Framework (NPPF) gives "great weight ... to conserving landscape and scenic beauty in National Parks" (paragraph 115), along with the conservation of wildlife and cultural heritage. It presents a bias against approval of major developments in these areas "except in exceptional circumstances" (paragraph 116). While other sections of the NPPF also give significant weight to economic considerations, it clearly sets a high bar for approval of applications of this sort within the South Downs National Park (SDNP).

It is important to stress that, in my view, this high bar should not rule out all fossil fuel exploration and development on the downs, even if in the Park area, or in the constituency. Nor should it preclude the use of new technology.



Some hydrocarbon extraction already takes place within the South Downs National Park. Its impact at Singleton, in the National Park, has been limited. The same goes for the exploration activity at Markswell Wood, which began in 2008.

However, this application raises concerns regarding a number of the principal environmental issues that mineral planning authorities are required to address, among other things, under Planning Practice Guidance for Onshore Oil and Gas, paragraph 30. Several points need to be taken into account.

First, exploration could lead to a significant loss of amenity in the SDNP area, both for those living nearby and for the wider community of Park users. A significant number of SDNP related businesses (those associated with tourism, leisure and agriculture) may also be adversely affected. The height, noise and lorry movement intrusion of this proposed installation may be inappropriate for a National Park and Area of Outstanding Natural Beauty. The Park Authority's obligation to conserve the landscape and its cultural and wildlife heritage is therefore directly engaged.

Secondly, the proximity of the application site to Fernhurst (as well as to Lynchmere and Haslemere) means that there will be a significant disturbance to local residents from noise, light and vehicle movements. The increase of the last of these will affect both the A286 and especially Vann Road, which is wholly unsuited to a large increase in HGV traffic.

Thirdly, the long term implications for the SDNP need to be considered. This application is for exploratory drilling. If this were to be granted, the exploration might yield nothing; it might result in development of conventional oil. Or it might suggest the presence of shale gas that can be developed through hydraulic fracturing. While this would need to be the subject of a separate planning application, it is important to note at this point that the American shale gas experience has often been of intensive development. If this were to lead to a large number of wells within a National Park this would not be acceptable to many of the inhabitants and could change the character of the Park.

It is reasonable for the Park authority to consider that this application for exploratory drilling will be part of a sequence of applications, in the absence of overwhelming evidence to the contrary. Therefore, the Park Authority needs to examine the application, and the Environmental Impact Assessment tied to it, by reference to the whole project life and its possible duration, not just the initial exploratory stage. The Park Authority should consider the cumulative environmental impact of possible subsequent development over the life of the project. Only such an approach can expect to fulfil the requirements of the Environmental Impact Assessment.



Shale gas exploration, and the exploratory drilling needed as a precursor to it, can offer great opportunities to this country as part of a practical and balanced energy policy. However, as with the location of any other industrial activity, it is important to assess rigorously the appropriateness of each application to the local environment. This application, so close to homes and communities within a National Park and bringing with it the prospect of subsequent development of indefinite duration and unknown scale, fails this test.

Yours sincerely

ANDREW TYRIE