

Derby and Derbyshire Minerals Plan Draft 2022

Response from Transition Chesterfield

April 2022

[Transition Chesterfield](#) is a local community group whose aims are to raise awareness of the issues associated with climate change and the need to develop a resilient, sustainable, low-carbon society. We would like to make the following comments on the draft Derbyshire and Derby Minerals Local Plan published in 2022.

Please note that we provided detailed comments on the previous draft plan in 2018, some of which are still valid and do not appear to have been addressed. Since 2018 there have been a number of key policy developments as well as new evidence which all point to the need for even tighter policies on climate change and new fossil fuel extraction. These include:

- The Climate Change Committee's Net Zero Plan and Sixth Carbon Budget¹
- Declaration of climate emergencies by many Local Authorities in Derby and Derbyshire²
- The IPCC Sixth Assessment Report which António Guterres, the UN secretary general, described as "*an atlas of human suffering and a damning indictment of failed climate leadership*"³
- The IPCC Mitigation of Climate Change report⁴ which spells out the huge cost reductions over the last decade in solar and wind power, and that that existing and currently planned fossil fuel projects are already more than the climate can handle. In other words we cannot extract more fossil fuels. António Guterres has said "*Increasing fossil fuel production will only make matters worse. It is time to stop burning our planet, and start investing in the abundant renewable energy all around us.*"
- The world's leading energy authority, the International Energy Agency (IEA) in 2021 have said that exploitation and development of new oil and gas fields must stop now if the world is to stay within safe limits of global heating and meet the goal of net zero emissions by 2050⁵.
- The government's moratorium on fracking⁶ and more recently
- Energy minister Kwasi Kwarteng has said that the energy crisis shows the importance of the UK's plan "to build a strong, home-grown renewable energy sector to further reduce our reliance on fossil fuels".⁷

Although the recent war in Ukraine has pushed energy security to the fore, many experts have warned against policies to start fracking or to maximise extraction of UK oil and gas:

¹ <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/> and <https://www.theccc.org.uk/publication/sixth-carbon-budget/>

² Including Amber Valley BC; Chesterfield CBC; Derby Ci; Derbyshire Dales DC; Erewash BC; High Peak BC; NE Derbyshire DC; South Derbyshire DC. Derbyshire County Council have a Climate Strategy.

³ <https://www.ipcc.ch/report/ar6/wg2/>

⁴ <https://www.ipcc.ch/report/ar6/wg3/>

⁵ <https://www.theguardian.com/environment/2021/may/18/no-new-investment-in-fossil-fuels-demands-top-energy-economist> May 2021

⁶ <https://www.gov.uk/government/news/government-ends-support-for-fracking>

⁷ <https://www.telegraph.co.uk/business/2022/02/28/fracking-not-answer-energy-crisis-insists-kwasi-kwarteng/>

- The former head of the United Nations, Ban Ki-Moon has urged the UK not to lift its fracking ban in an effort to bolster energy resilience in the wake of Russia’s invasion of Ukraine, saying it would not be in the “long-term interest of humanity”.⁸
- Adam Vaughan in the New Scientist suggested the only real long-term fix is to cut the UK’s reliance on gas by backing renewables and low-carbon alternatives to gas boilers, such as heat pumps.⁹
- The CCC have argued that best way to ease consumers' pain from high energy prices is to stop using fossil fuels rather than drill for more of them and any UK-produced gas would be sold internationally and barely reduce the consumer price¹⁰. They said wind and solar power, as well as home insulation, is a better route.
- A number of scientific experts also note that fracking is not a good solution to the current energy crisis or for energy security.¹¹
- Independent analysis by Carbon Brief shows that if the 649 wind and solar projects already cleared for development in the UK were actually built they would, collectively, more than offset the gas that is currently imported from Russia.¹²

Issues with the plan

“New fossil fuel investment is moral and economic madness”

António Guterres, the UN secretary general.

- The vision of the document and overall policies are still based on promoting the use of minerals and fossil fuels for economic growth. The plan is largely about minimising the impacts of these industries rather than preventing them where more sustainable alternatives exist.
- It is still very weak on climate change. Although a new policy on climate change has been added (SP2, pp47) it permits the development of new extractive industries provided *they incorporate measures to minimise and offset greenhouse gas emissions*. It also only addresses the operational impacts of the industry and does not address the climate impacts from the use of that mineral/fossil fuel once it has been extracted.
- On coal extraction this is permitted on climate grounds if it can be shown to be “environmentally friendly” though there is no definition of what this means.
- The document’s rationale for continued extraction of natural gas and fracking that *“continued good access to natural gas from both domestic and international markets is seen as critical.”* Is factually wrong, misguided and not aligned with net zero targets nor more recent pronouncements to reduce reliance on oil and gas

⁸ <https://www.theguardian.com/environment/2022/mar/13/fracking-is-dangerous-ban-ki-moon-warns-uk-government-over-climate-commitments>

⁹ <https://www.newscientist.com/article/2290840-blame-fossil-fuels-not-renewables-for-the-uks-winter-energy-crisis/>

¹⁰ <https://www.bbc.co.uk/news/science-environment-60497058>

¹¹ <https://www.sciencemediacentre.org/expert-reaction-to-arguments-about-fracking-for-uk-energy-security/>

¹² <https://inews.co.uk/opinion/fracking-onshore-wind-boris-johnson-uk-weapon-against-vladimir-putin-1506705>

The Vision, pp25

The vision is both weak on climate change and has a presumption that mineral and fossil fuel extraction should continue for economic growth reasons provided it can minimise the impacts of climate change. Instead we think that the climate crisis should force a presumption that mineral extraction and fossil fuel extraction should only be permitted **where no viable substitutes exist taking account of demand management measures such as insulation** and provided that there is **no net increase in greenhouse gas emissions** from the operation and use of those minerals. We therefore suggest the following wording changes to the vision (additions in red):

*Over the Plan period to 2038, the Plan will continue to deliver sustainable minerals development **where no viable substitutes exist taking account of demand management measures such as insulation**, ensuring that the supply of minerals from Derbyshire and Derby will continue to reflect the importance of the minerals industry in the Plan area and will continue to make a positive contribution to delivering sustainable economic growth, supporting the health, well-being, safety and amenity of local communities, protecting, conserving and enhancing the natural, built and historic environment and mitigating and adapting to the impacts of climate change **by ensuring there is no net increase in greenhouse gas emissions during operation and from subsequent use of those minerals with a reduction being a preferred target** as we move towards the national 'zero carbon emissions' target of 2050.*

Objective 8: Minimising the impacts on climate change and flood risk, pp28

As for the vision this objective should be reworded as follows:

*3.16 To reduce the effect of mineral development on the causes of climate change and facilitate adaptation to the effects of climate change, including flood risk, mineral development **will only be permitted where no viable alternatives exist** be located, designed and operated in ways which; maximise the use of sustainable modes of transport including rail, water, pipeline and conveyor; minimise the use of machinery and processing emissions, maintain or enhance water quality; optimise on-site water and energy use; maximise energy provision from renewable and low-carbon sources and reduce the risk of flooding both on site and in the wider area. **There should be no net increase in greenhouse gas emissions during operation and from the subsequent use of those minerals with a reduction being a preferred target.***

The impacts on climate change should be estimated at the outset and before any application is approved through a thorough carbon audit.

Policy SP1 SUSTAINABLE MINERALS DEVELOPMENT, pp32

This needs to be strengthened. Suggested rewording is in red and strikethrough below:

4.9 Proposals for mineral development and mineral related development will be supported where they contribute towards achieving the economic, social and environmental objectives of sustainable development and where applicable, they:

*17) reduce impacts on the causes of climate change **by ensuring there is no net increase in greenhouse gas emissions during operation and from subsequent use of those minerals with a reduction being a preferred target** ~~including reducing carbon emissions~~, and facilitate adaptation to increase resilience to climate change including the risk of flooding; and*

Policy SP2 CLIMATE CHANGE pp47

This policy is extremely weak and allows for mineral and fossil fuel extraction on climate grounds provided that measures are taken to ‘minimise and offset greenhouse gas emissions’. Firstly offsetting should not be allowed, due to the poor monitoring of offset schemes. Secondly minimising emissions is not sufficient. There should be no net increase in greenhouse gas emissions (including methane and other greenhouse gases, not just carbon) and preferably a reduction.

We consider the proposed wording from our 2018 submission is better aligned with the current policy on net zero. Ie

“Climate change impacts should, as far as possible, be avoided and schemes should demonstrate that there is no viable substitute for the mineral/energy and that there is no net increase in greenhouse gas emissions resulting from its extraction and use, taking into account the release of fugitive emissions, and preferably a reduction in emissions.”

POLICY SP12: SUPPLY OF CEMENT MAKING MATERIALS, pp93

This policy is based on assumptions that demand for cement will continue at the same rate for the next 25 years. UK concrete and cement currently account for around 1.5% of UK carbon dioxide emissions, and an even higher proportion of Derbyshire’s emissions. The increasing use of more sustainable building materials and modular construction will reduce the demand for cement, as will innovative techniques and recycling. Large property developers are already exploring ways to cut carbon which would also significantly cut cement/concrete use¹³. The plan should include evidence that shows there is a prospect of falling demand and whether it is necessary to have such large reserves.

POLICY SP16: COAL EXTRACTION AND COLLIERY SPOIL DISPOSAL, pp114

This policy is extremely weak and permits extraction of coal as long as it can demonstrate

“that it is environmentally acceptable, or can be made so by planning agreements and obligations; or if it is not environmentally acceptable, that it would provide national, local or community benefits of a scale which clearly outweigh the likely impacts (taking all relevant matters into account, including any residual environmental impacts).”

We fail to see how any coal extraction can be environmentally acceptable given the evidence from IMF, the CCC and others that there should be no new coal extraction. This policy needs to make clear that there should be no new coal extraction.

8.2 CONVENTIONAL AND UNCONVENTIONAL HYDROCARBONS AND GAS FROM COAL p116

As in the previous 2018 draft plan there is a strong bias in the paper towards the assumed need for oil and gas, including shale gas. The draft 2018 plan stated that *“Modern society and the benefits it enjoys are highly dependent on the continued supply of energy, including the continued supply of oil and gas.”* The current plan has similar wording *“continued good access to natural gas from both domestic and international markets is seen as critical.”*

¹³ <https://www.businessgreen.com/feature/4019661/materials-innovation-modular-construction-property-sector-plots-pathway-net-zero>

While the NPPF states that *“It is important therefore that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs.”* However it does not follow that having sufficient supply of energy means the continued supply of fossil fuels since the deployment of renewable energy offers cost-effective alternatives to oil and gas.

Part of the rationale given in the draft plan for the extraction of natural gas and fracking (conventional and unconventional hydrocarbons and gas from coal) comes from the Climate Change Committee (CCC) who are stated to predict *“that we will still be consuming about 70% of the gas that we consume today in 2050 under our net zero target as significant reductions across building, industry and power are offset by demand for gas to produce hydrogen and therefore, continued good access to natural gas from both domestic and international markets is seen as critical.”*

This statement is completely outdated and actually has the CCC’s predictions backwards. In the CCC’s Sixth carbon budget the CCC actually predict a 76% **reduction** in gas consumption in the period 2020-2050, i.e. under our net zero target we will be consuming 24% of the gas we consumed in 2020 (consumption of gas will reduce from 920 TWh in 2020 to 217 Twh in 2050).

This suggests that **the rationale for more gas extraction in the Draft Minerals Plan is based on outdated and completely wrong assumptions**. Using the latest evidence from the CCC and the IPCC means that the policies in the plan should be urgently revised on the basis of a presumption against more gas extraction.

POLICY SP17: SUPPLY OF CONVENTIONAL AND UNCONVENTIONAL OIL AND GAS, pp135

This policy as currently worded provides no rationale or assessment of the need for the gas, or the mitigation of climate impacts or the need to align with net zero targets. We propose that this policy be urgently redrafted in light of all the evidence and a much stronger presumption against supply be considered. It should only be where no viable alternative to the energy source exists through demand management or renewable sources. It should also have a net zero impact on climate change, including through operation and subsequent use.

There is a precedent for this in the Kirklees Minerals Plan which states: *“All Proposals for production of Hydro-Carbons should demonstrate net zero impact on climate change.”*

While there is some political pressure for fracking, mainly from the fracking industry and its supporters, this should be strongly resisted on the basis that there is no need for the gas (see evidence cited on pp2 of this response), the impacts on climate change and the strength of public opposition against fracking in Derbyshire and elsewhere.

Transition Chesterfield

Making Chesterfield More Sustainable

<http://transitionchesterfield.org.uk/>