

Shale Consultation
Planning Infrastructure Division
Ministry of Housing, Communities and Local Government
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Dear Sir

Consultation: Permitted development for shale gas exploration

[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 have grave concerns about the Government's proposals to make shale gas exploration permitted development for the following reasons:

1. Shale gas development will undermine the UK's legally binding carbon targets

A 2017 National Grid study shows that **only a 'no shale' scenario** allows us to meet our 2050 carbon reduction target in the Climate Change Act and all other scenarios involving shale gas development will undermine that target.¹ National Grid suggests we need to move rapidly away from natural gas and towards electrification of heating. By facilitating the shale gas industry through this proposal, the Government is undermining its own legally binding carbon targets.

The Government has yet to explain how fracking for a fossil fuel sits with UK commitments to tackle climate change.

2. It is an affront to local democracy

The shale gas industry is a new and potentially damaging industry that threatens communities. It is only right and proper that local people and councils should be given the right to judge the impacts of fracking for their local communities.

The Parliamentary Housing, Communities and Local Government Committee have also stated that Mineral Planning Authorities are best placed to understand the local

¹ National Grid (2017) Future Energy Scenarios. <http://fes.nationalgrid.com/media/1253/final-fes-2017-updated-interactive-pdf-44-amended.pdf>

area and how fracking can best take place.² Their report into planning guidance on fracking concluded that moving decision making on fracking planning applications to a national level **contradicts the principles of localism** [our emphasis] and would likely exacerbate existing mistrust between communities and the fracking industry.

We agree with the Committee Chair who stated:

“It would remove the important link between fracking applications and Local Plans and be hugely harmful to local democracy and the principles and spirit of localism. It is mineral planning authorities that have the knowledge of their areas needed to judge the impacts of fracking, not ministers sitting in Whitehall.”

3. Shale gas will not improve and will likely undermine energy security

The consultation states that shale gas “*has the potential to play a major role in further securing our energy supplies*” yet produces no evidence to support this. Elsewhere the Government has claimed that our gas imports will increase to around 76% by 2035. This latter figure is taken from the 2017 National Grid study referred to earlier.³ This study shows that in a ‘high shale gas’ scenario consumer energy demand will be much greater, so that the total amount of gas imported in 2035 is quite similar to that of a ‘no shale’ scenario. Furthermore the absolute amount of gas from generic imports (i.e. potentially unstable sources) is greater in the ‘high shale’ scenario than in the ‘no shale’ scenario.

In other words, even with high shale gas development, we could still be heavily reliant on imported gas in absolute and percentage terms, and possibly even more reliant on generic imports than without shale gas.

Rather than improving energy security the development of shale gas is likely to do the complete opposite. At the same time as encouraging shale gas development the Government is withdrawing its support for renewable energy which is a proven, clean and sustainable way of improving energy security.

In summary we totally oppose the Government’s proposals and consider that they should be dropped immediately.

Our specific responses to the questions in the consultation are:

Q1: Do you agree with this definition to limit a permitted development right to nonhydraulic fracturing shale gas exploration?

A: No

Q2: Should non-hydraulic fracturing shale gas exploration development be granted

² House of Commons Committee on Housing, Communities and Local Government (2018). Planning Guidance on Fracking. Enquiry, July 2018. <https://www.parliament.uk/business/committees/committees-a-z/commons-select/housing-communities-and-local-government-committee/news/fracking-planning-guidance-report-published-17-19/>

³ See footnote 1

planning permission through a permitted development right?

A: No

Q3: Do you agree that a permitted development right for non-hydraulic fracturing shale gas exploration development would not apply to the following?

A: There should be no permitted development rights anywhere and not just excluded from areas of conservation, landscape, heritage or wildlife importance

Q4: What conditions and restrictions would be appropriate for a permitted development right for non-hydraulic shale gas exploration development?

A: We think there should be no permitted development and any conditions and restrictions should be decided by local planning committees through the normal planning process.

Q5: Do you have comments on the potential considerations that a developer should apply to the local planning authority for a determination, before beginning the development?

A; We think a developer should apply for planning permission through the normal planning process.

Q6: Should a permitted development right for non-hydraulic fracturing shale gas exploration development only apply for 2 years, or be made permanent?

A: There should be no permitted development rights for any period.

Q7: Do you have any views the potential impact of the matters raised in this consultation on people with protected characteristics as defined in section 149 of the Equalities Act 2010?

A. This will negatively impact on all people with protected characteristics living in the vicinity of any proposed shale gas exploration.