



## Transition Chesterfield Response to Derbyshire and Derby Minerals Local Plan Pre-submission draft April 2023

[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 commented on previous versions of the draft Derbyshire and Derby Minerals Local Plan in 2016 and 2018. We would like to make the following comments on the pre-submission draft plan published in January 2023.

Firstly, we appreciate the changes to the plan in response to community concerns about climate change. The wording of the plan has been much improved to reflect the serious threat posed by climate change and includes more recent scientific evidence and reference to the UK's legally binding carbon targets and international commitments.

However, the extreme nature of this threat is not carried through to some of the policies in this paper which themselves rely on government policy and the National Planning Policy Framework (NPPF).

For example, in paragraph 1.10 the definition of sustainable development from the NPPF is quoted as “meeting the needs of the present without *compromising the ability of the future generation to meet their own needs*”. In order to satisfy this there needs to be a requirement to radically reduce greenhouse gas emissions, and this cannot be traded off against other requirements. Any failure to mitigate climate change would seriously compromise not only the needs of current and future generations but threatens future life-support systems. It is widely accepted that the extraction of fossil fuels from committed reserves will lead to warming beyond 1.5°C, let alone any new reserves<sup>1</sup>. The International Energy Agency have called for no more investment in oil and gas from 2021 in order to meet carbon targets<sup>2</sup>.

We reject unequivocally the assumption made in this plan that continued fossil fuel extraction is necessary in Derbyshire or the UK.

### **Policy SP2 on climate change**

Policy SP2 on climate change supports proposals for mineral development and mineral related development where they include measures that clearly demonstrate “*a progressive reduction of carbon dioxide (and other greenhouse gas) emissions including fugitive emissions consistent with meeting national and local carbon targets and achieving net zero emissions by 2050 unless the proposal involves the extraction of coal where emissions associated with the proposal should be ‘net zero’ from the outset*”.

It is not clear whether this policy includes emissions from the use of fossil fuels, which we believe it should. If so, then there should be no reduction of carbon dioxide associated with the extraction of fossil fuels, unless the development includes a robust method of Carbon Capture and Storage (CCS). This should be made clear in the policy, by specifying that scope 3 emissions are included and there should be no option for offsetting given the poor standards of offsetting schemes, the majority of which fail to reduce emissions<sup>3</sup>.

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<sup>1</sup> Trout K et al (2022) [Existing fossil fuel extraction would warm the world beyond 1.5 °C](#). Environmental Research Letters, Vol 17, No. 6.

<sup>2</sup> <https://www.theguardian.com/environment/2021/may/18/no-new-investment-in-fossil-fuels-demands-top-energy-economist>

<sup>3</sup> <https://www.transportenvironment.org/discover/85-offsets-failed-reduce-emissions-says-eu-study/>

### Policy approach to fossil fuels

Paragraph 8.2.42 describes the policy approach thus:

*“Modern society and the benefits it enjoys are highly dependent on the continued supply of energy, and whilst the Government seeks to transform energy supply to be derived principally from non-fossil fuel clean technologies, the continued supply of oil and gas will still be required during this transition.”*

While the first part of this paragraph is reasonable in that we are highly dependent on the continued supply of energy, it does not have to follow that this requires or implies the continued supply of oil and gas. Nowhere does the NPPF state the need to provide for a steady and adequate supply of hydrocarbons, but rather the need for a *“sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs”* and it is a second level inference that this implies the need for oil and gas. Given the rapid technological change in UK’s energy mix it is important that this Plan, which will be in place for many years, does not make the mistake of assuming that fossil fuels are needed and instead sticks with the stated approach in the NPPF to provide a sufficient supply of energy, without stating what that energy source should be.

Instead, a combination of energy efficiency and renewable energy sources can meet UK’s energy needs in a more cost effective and less environmentally damaging way.

There is massive potential in energy demand reduction. One study suggested that up to one quarter of UK’s household energy could be cost effectively saved by 2035<sup>4</sup>. Others have suggested reductions in energy demand of 52% by 2050 compared with 2020 levels are possible without compromising on citizens’ quality of life<sup>5</sup>. At the end of 2020 there were still around 8,5 million homes with uninsulated lofts (around 34% of homes with lofts)<sup>6</sup>.

There is also massive potential for more renewable energy. 2020 marked the first year in the UK’s history that electricity came predominantly from renewable energy, with 43% of our power coming from a mix of wind, solar, bioenergy and hydroelectric sources<sup>7</sup>. At one point in May 2022, 73% of the grid’s power came from renewable sources. The National Grid anticipate that the UK’s renewable capacity will increase dramatically over the next decade. Developments in grid balancing and storage will mean an increasing role for renewables in the electricity supply in the future.

Paragraph 8.2.30 cites the Government’s 2022 ‘energy security strategy’ which support an increase in domestic oil and gas production. Yet many experts have criticised this strategy for (a) ignoring the importance of reducing energy demand through measures such home insulation and (b) ignoring the role of onshore wind<sup>8</sup>.

As one expert said:

*“The government’s ‘British Energy Security Strategy’ released on the 7th April 2022 has raised more questions than answers for those in interested in energy policy. While it claims to offer*

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[https://www.researchgate.net/publication/325987898\\_The\\_remaining\\_potential\\_for\\_energy\\_savings\\_in\\_UK\\_households](https://www.researchgate.net/publication/325987898_The_remaining_potential_for_energy_savings_in_UK_households)

<sup>5</sup> <https://www.nature.com/articles/s41560-022-01057-y>

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/970064/Detailed\\_Release\\_-\\_HEE\\_stats\\_18\\_Mar\\_2021\\_FINAL.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/970064/Detailed_Release_-_HEE_stats_18_Mar_2021_FINAL.pdf)

<sup>7</sup> <https://www.nationalgrid.com/stories/energy-explained/how-much-uks-energy-renewable>

<sup>8</sup> <https://www.sciencemediacentre.org/expert-reaction-to-government-announcement-on-energy-and-net-zero/>



*solutions to the dual problems of rising energy prices and threats to natural gas supplies, it adopts an outdated method that runs conversely to net zero targets.”<sup>9</sup>*

### **Policy SP16 on Supply of Conventional and Unconventional Oil and Gas**

For all of the above reasons we consider that Policy SP16 is outdated and misguided. Instead of supporting proposals for the exploration and/or appraisal of onshore conventional and unconventional oil and gas, subject to the listed conditions, there should be a presumption against them.

If this is not possible, then there can at the very least be much stronger environmental and carbon safeguards in place. In the 2018 version of the plan there were two alternative options for this policy and we supported the second one which included the criteria:

*“the applicant has demonstrated that all potential adverse environmental, social and economic impacts can be mitigated to levels which are acceptable to the MPA”.* This should include carbon impacts relating to the use of fossil fuels as well as the operational and fugitive greenhouse gas emissions and the landscape, air quality, historic, biodiversity and health impacts.

The Government has acknowledged that the UK is not on track to meet its legally binding 2030 carbon targets. These should not be compromised further by the extraction of unnecessary minerals and energy.

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<sup>9</sup> [https://blog.policy.manchester.ac.uk/energy\\_environment/2022/05/the-energy-strategy-missed-opportunities-fale-solutions-better-ways-forward/](https://blog.policy.manchester.ac.uk/energy_environment/2022/05/the-energy-strategy-missed-opportunities-fale-solutions-better-ways-forward/)