

M71 Written Statement from Just Space 2718

Hydraulic Fracturing

M71. Would Policy SI11 be consistent with national policy¹⁸ in respect of the exploration, appraisal or production of shale gas via hydraulic fracturing? If not, what is the justification for the approach taken?

¹⁸ National policy as set out in the NPPF PPG Minerals and the WMS Planning for Onshore Oil and Gas: Written Statement (16 September 2015) and Energy Policy: Written statement (17 May 2018)

There is a need to situate the answers within an international context given the UK commitment to the Paris Agreement within the United Nations Framework Convention on Climate Change.

Environmental Policy and the Paris Agreement

Just Space strongly support this policy which sets out that development proposals for exploration, appraisal or production of shale gas via hydraulic fracturing should be refused. This is essential in order for London to become zero-carbon by 2050 and to avoid the harmful impacts on communities and the environment associated with this technology.

This is in line with national policy as the UK is committed to upholding the international Paris Agreement. The UK is currently aiming to reduce emissions by 80% by 2050¹, yet the Grantham Research Institute on Climate Change and the Environment and the ESRC Centre for Climate Change Economics and Policy at London School of Economics and Political Science say that to reach our international commitments this would need to be changed to net-zero.

While advocates may suggest that fracking is a 'low carbon' energy alternative, the methane it produces is a far more potent contributor to global warming than carbon dioxide. Over a 100-year timeframe, a pound of methane has 34 times the heat-trapping effect of a pound of carbon dioxide. Methane is even more potent relative to carbon dioxide at shorter timescales, at least 86 times more over a 20-year period².

¹ S. Fankhauser, A. Averchenkova and J. Finnegan (2018) *10 years of the UK Climate Change Act*, London School of Economics, Grantham Research Institute on Climate Change and the Environment and Centre for Climate Change Economics and Policy (<http://www.lse.ac.uk/GranthamInstitute/news/uk-climate-legislation-must-closely-aligned-paris-agreement-2020/>)

² E. Ridlington, K. Norman and R. Richardson (2016) *Fracking by the numbers*, Environment America Research and Policy Group and Frontier Group (<https://environmentamerica.org/sites/environment/files/reports/Fracking%20by%20the%20Numbers%20vUS.pdf>)

In 2016, emissions from the combustion of natural gas were responsible for 35% of the UK's total greenhouse gas emissions. Deeper de-carbonization of the gas network is therefore essential if the UK is to meet its current greenhouse gas emissions reduction target of 80%, or its likely future net-zero greenhouse gas emissions target³. Natural gas will need to be eliminated from all energy networks to achieve these goals.

Therefore, fracking is not compatible with our current targets and environmental policy let alone more ambitious but crucially necessary ones.

National Policy referenced in the Matter

The 2018 WMS on Energy Policy, which largely re-iterates the 2015 WMS on Planning for Onshore Oil and Gas, indicates that the UK has gone from being an exporter of gas in 2003 to being a net importer from then onwards, due to a decline mainly in North Sea production. The Government's view is that gas has a key role in fulfilling the change to secure low carbon energy and there are potentially substantial benefits to the economy from the safe and sustainable exploration and the development of our own onshore shale gas resources. The WMS states that shale gas development is of national importance and that this document should be a material consideration in the determination of planning applications, which should be dealt with quickly. The PPGM says that there is a pressing need for exploration to establish whether there are viable amounts of hydrocarbons which can be extracted that can add to the variety of resources from which energy can be produced.

Just Space has had sight of the Written Statement by the Friends of the Earth (respondent 755) and to avoid unnecessary duplication refers the reader to the opening parts of that Written Statement. Namely, that it is doubtful that any exploitable resource exists within London, either geologically (vide British Geological Society⁴) or because of the likely adverse effects on protected landscapes or close proximity to people. This, in the view of Just Space renders the aforementioned national policy as not relevant to London for the objective of 'safe and sustainable' exploration cannot be achieved.

National Planning Policy Framework

³ W. Lytton and R. Shorthouse (2019) *Pressure in the Pipeline: Decarbonising the UK's Gas*, Bright Blue <http://brightblue.org.uk/wp-content/uploads/2019/02/Pressure-in-the-pipelines.pdf>

⁴ Jurassic shales of the Weald Basin: geology and shale oil and shale gas resource estimation. British Geological Survey for DECC 2014 https://www.ogauthority.co.uk/media/2773/bgs_decc_jurassicwealdshale_study_2014_main_report.pdf

Whilst the 2012 version does not explicitly reference shale gas exploration and development, unlike the 2019 version (para 209), it is clear on its key aims alongside other positions, recommendations and specific policies. For both versions, Section 2: opens with: “The purpose of the planning system is to contribute to the achievement of sustainable development...” summarized “as meeting the needs of the present without compromising the ability of future generations to meet their own needs”⁵.

The International Panel on Climate Change⁶ have warned there are only 12 years for global warming to be kept to a maximum of 1.5C, beyond which even half a degree will significantly worsen the risks of drought, floods, extreme heat and poverty for hundreds of millions of people – in other words compromising the ability for future generations to meet their own needs. As discussed above, for the UK to achieve its unambitious current targets of 80% emissions reductions which are still not enough to keep to 1.5C, it would need to drastically decarbonize by eliminating natural gas from its energy networks. Therefore, NPPF 2019’s position on shale gas is in direct contraction of its commitments to sustainable development and intergenerational equity whereas Policy SI11 is consistent with sustainable development and intergenerational equity.

NPPF 2019 Paragraph 95 and 149: “Planning policies and decisions should promote public safety and take into account wider security... by anticipating and addressing malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas... [should] include appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security”⁷.

The government banned fracking in the UK after 2011, when Cuadrilla’s operations in Blackpool caused an earthquake of 2.3 magnitude⁸. Since they recommenced in Lancashire in 2018, Cuadrilla has been put on temporary bans after multiple earthquakes reaching 0.5 magnitude⁹. Here, NPPF’s positive outlook to shale gas is

⁵ Ministry of Housing, Communities and Local Government (2012 & 2019) *National Planning Policy Framework*

⁶ <https://www.ipcc.ch/2018/10/08/summary-for-policymakers-of-ipcc-special-report-on-global-warming-of-1-5c-approved-by-governments/>

⁷ Ministry of Housing, Communities and Local Government (2019) *National Planning Policy Framework*

⁸ The British Geological Survey (2011) Blackpool earthquake | Magnitude 2.3 | 1 April 2011

<http://earthquakes.bgs.ac.uk/research/events/BlackpoolApril2011.html>

⁹The British Geological survey (2019) Earthquakes around the British Isles in the last 100 days

https://earthquakes.bgs.ac.uk/earthquakes/recent_uk_events.html

in direct contradiction of commitment to policies and decisions which protect citizens from natural hazards. Fracking in the densely populated London would be an even greater threat to public safety. SI11 is consistent with protecting public safety.

NPPF 2019 Paragraph 151 and 152: “To help increase the use and supply of renewable and low carbon energy and heat, plans should provide a positive strategy for energy that maximizes the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts)”, “Local planning authorities should support community-led initiatives for renewable and low carbon energy”¹⁰.

Hydraulic fracturing, while argued by some to be a low carbon source, still produces methane, a more potent greenhouse gas (as discussed in previous section). Investing in natural gas and fracking energy infrastructure as a ‘transition’ fuel to a low carbon economy, misdirects time and resources away from implementing truly zero-carbon, renewable energy sources. Furthermore, Cuadrilla and the UK Department for Business and Energy has faced blowback from frontline fracking communities in the north of the UK for circumventing local democracy through new fracking regulations, and the fracking rig disrupting the landscape and impacting biodiversity¹¹. Fracking is an environmentally harmful, centralised, corporate-led energy source. Therefore, NPPF’s outlook on shale gas is in direct contraction of its commitments to renewable energy, sustainable development and community-led energy initiatives. SI11 is consistent with commitments to renewable energy, sustainable development and community-led energy initiatives.

Conclusion

SI11 is consistent with national policy which prioritises progressive environmental and social values and goals. It is less consistent with NPPF’s open position on shale gas exploration, but this position also is not consistent with many of its own policies. London should commit to refusing fracking, and continue to lead the UK by example,

¹⁰ Ministry of Housing, Communities and Local Government (2019) *National Planning Policy Framework*

¹¹ E. Ridlington, K. Norman and R. Richardson (2016) *Fracking by the numbers*, Environment America Research and Policy Group and Frontier Group

upholding its progressive environmental values with equally progressive policies in the New London Plan.