



Nottinghamshire Wildlife Trust (NWT) – Submission for the Nottinghamshire Minerals Local Plan Examination – *Supplementary Questions*

MATTER 3 – Minerals Provision Policies

Issue: Whether the minerals provision policies are positively prepared in terms of making adequate provision for minerals, whether they are consistent with national policy, justified and otherwise sound.

Policy MP12: Oil and Gas

44 Should the policy include detailed criteria for assessment of environmental impacts for each stage of development?

Yes, this is essential, perhaps within the supporting text, as each stage of development may have different types or scales of impact, for example, noise and vibration levels from drilling exploratory boreholes may be different to that which would be experienced from production drilling, and over a different timescale. There is also a need to consistently integrate an assessment of Carbon and NOx emissions that would result from oil or gas extraction, conventional or unconventional, into the decision-making for a scheme, as it is particularly complex, and advice on what is required should be provided for applicants, consultees and decision-makers. Full EIA should be expected for each stage of the development, as is expected for all other mineral types.

45 Should the policy recognise specific impacts that can result from hydraulic fracturing?

Yes, MP12 should be amended to make it explicit that when determining planning applications decision-makers should take into account the climate change impacts of the development, and the potential impact on climate change commitments and decarbonisation goals. There should be unequivocal guidance that developers must set out the likely climate change impacts of the proposal and the consistency of the proposal with Government intentions and commitments, including with respect to decarbonisation and the meeting of greenhouse gas reduction commitments.

There are also potential impacts on deep geology (and the associated aquifers) that (with the cessation of deep-mining) are largely unique to hydraulic fracturing, and require particularly detailed and careful impact assessment, based on robust science.

46 What are the 'protected areas' as set out in parts (1) (a) and (2) (a) of Policy MP12? If these are the protected areas defined in the Onshore Hydraulic Fracturing (Protected Areas) Regulations 2016 should they be stated in the supporting text or in a footnote?



What is the relevance of those areas to oil and gas exploration other than hydraulic fracturing?

Clarity and further explanation of this is extremely important, as NWT had assumed protected areas to encompass all areas protected for their biodiversity at all levels ie: SAC, SPA, NNR, SSSI, LWS and LNR. If indeed the policy refers to only those Protected Areas as defined by the Regulations (National Parks, the Broads, AONBs and World Heritage Sites), then the policy is inadequate to protect sites designated for their biodiversity value, and indeed, none of these “protected areas” occur in Nottinghamshire.

NWT would recommend the listing of all types of protected biodiversity (and heritage) sites in which appraisal, exploration and production would not be allowed.

47 Should the policy or the supporting text state what circumstances are likely to constitute ‘exceptional circumstances’?

The caveat “*other than in exceptional circumstances where this does not compromise the reasons for the designation and the need for development can be demonstrated*” should be removed, as this creates the potential for confusion and misinterpretation, not least the differing interpretation of “*need for the development*”, particularly when set against the background of the climate emergency.