

## **Response to consultation on inclusion of shale gas production projects in the Nationally Significant Infrastructure Project (NSIP) regime October 2018**

### **Introduction**

1. The Campaign for National Parks is the independent national voice for the 13 National Parks in England and Wales. Our mission is to inspire everyone to enjoy and look after National Parks – the nation’s green treasures. We have been campaigning for over 80 years to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all.
2. National Parks play a vital role in sustainable development. They are home to rural communities and also support the protection of the landscape, wildlife and key environmental resources and services, like water provision and carbon storage in peat soils and forests, which can mitigate the effects of climate change. As well as being inspiring places for people to enjoy and improve their health and well-being, National Parks make a significant contribution to the economy through tourism, farming, and other related businesses. Many of these businesses rely on the high quality environment of these areas for their success and many of the benefits which National Parks provide, including tourism and rural economic growth, could be lost if the special qualities for which they are valued are undermined. It is therefore essential that national planning policy provides strong support for the protection and enhancement of these areas.
3. We are opposed to fracking in, under or within the setting of National Parks. Fracking is a non-renewable source of energy generation and undermines the UK’s progress towards meeting climate change targets. There will also be significant environmental impacts – groundwater, noise and air pollution, damage to landscape, tranquility and wildlife, and increased traffic on unsuitable rural roads. In short, it poses a significant threat to the environment.
4. Even though there are measures in place to restrict fracking on the surface of National Parks, there is nothing to prevent fracking from taking place underneath the surface of these areas. This means there is likely to be continued pressure for fracking related development just outside the boundaries of areas which are supposed to have the highest level of protection in planning policy. It is therefore essential that all fracking-related development is properly managed and monitored through the local planning system. We strongly object to the inclusion of shale gas production projects in the Nationally Significant Infrastructure Project (NSIP) regime

### **Response to specific consultation questions**

#### **Q1 Do you agree with the proposal to include major shale gas production projects in the Nationally Significant Infrastructure Project regime?**

5. No, we do not agree with this proposal for the following reasons:

- In combination with the parallel proposal to introduce permitted development rights, this proposal would undermine the plan-led process of determining what parts of a particular area are suitable for particular types of development.
- Local plans are developed by local planning authorities (mineral planning authorities) in consultation with local people and failure to take account of the priorities identified in them would leave local communities feeling disenfranchised. Although the consultation document states that “Local communities must be fully involved in planning decisions...” there are limited opportunities for community input to the NSIP regime and it can be hard for communities to engage with the process. This proposal would leave local communities with almost no input to decisions which have a major impact on their surroundings and would harm public perceptions of planning.
- It does not fit with the original intentions of the NSIP regime. This was set up to deal with large, nationally important pieces of infrastructure which need to be determined at a national level, such as power stations, major road schemes, pipelines and powerlines. The statutory thresholds for such development make it clear that only infrastructure that affects a significant area of land due to its length or scale should be subject to the NSIP regime. Although shale gas exploration has significant impacts, the area of land it covers is significantly smaller than the types of project currently dealt with through the NSIP regime.
- We do not believe that including shale gas production in the NSIP regime would speed up decision-making.

**Q5 At what stage should this change be introduced? (For example, as soon as possible, ahead of the first production site, or when a critical mass of shale gas exploration and appraisal sites has been reached).**

6. We do not support the inclusion of shale gas production projects in the NSIP regime but if this change is to be introduced, it should only be once a critical mass of shale gas exploration and appraisal has been reached and there is clear evidence that the level of probable and proven shale gas reserves is nationally significant.

For further information about any aspect of this response, please contact Ruth Bradshaw, Policy and Research Manager (email:ruthb@cnp.org.uk, tel: 020 7981 0896)