

**DRAFT MINERALS PLANNING GUIDANCE NOTE ON  
ON-SHORE OIL, GAS AND COALBED METHANE EXTRACTION**

**COMMENTS FROM:  
THE INSTITUTION OF ENVIRONMENTAL SCIENCES - JANUARY 2000**

1. Paragraphs 6-8 refer to Government energy policy but also state that "Particular investment decisions are for the industry to make. The commercial and economic considerations that underlie particular investments are nonetheless subject to the environmental acceptability....". The basic decision for any development, even before investigation, should be subject to considerations of sustainability within the broader context of overall energy policy and resource development. There should be national guidelines laid down to which planning approval decisions can relate. The matter of environmental impact should be considered AFTER the desirability and sustainability of the development of the source has been fully dealt with.
2. Paragraph 45 refers to the possible introduction of the 'need' for the development outweighing planning disadvantages (e.g. environmental damage). The point raised above (Item1) is relevant in this context also and when these arguments are considered it should also be in the full context including sustainability.
3. Paragraph 25 refers to the requirement for EIA's where " a significant effect on the environment" is expected. This applies both to extraction and to exploration. There is no definition of "significant" nor of who will decide this definition. It is highly unlikely that any extraction will not have environmental effects and therefore an EIA should be required in all cases. For exploration a full EIA may not be required but there should at least be a full statement in each case of the expected environmental effects and the measures proposed to deal with these.
4. One of the environmental effects of drilling for either exploration or extraction is surplus spoil. Proposals for the acceptable method of disposal of this should form part of the planning approval conditions.

Another possible environmental effect NOT mentioned in the draft is the possible escape of methane to the atmosphere. Control systems to be used to prevent leakage should be specified and approved as a part of the license system.

5. Restoration and aftercare is dealt with in paragraphs 48 and 49. Some concern is felt in the case of situations where a long-term license (say up to 30 years) is granted. Interim provision, say at 5 year intervals, for on-going re-mediation and review of processes should be provided.