

From: [REDACTED]
To: [Local Plan](#)
Subject: Local Plan
Date: 17 June 2019 20:28:36
Attachments: [IGas response - Warrington Local Plan.docx](#)

Dear Local Plan Team

Due to some administrative and technical difficulties it may be that you have not received IGas Energy PLC's response to your consultation on the Warrington Draft Local Plan before the 5.00pm deadline today. If this is the case I apologise and would be grateful if you would accept the attached unformatted copy as IGas's formal response. Please could you confirm whether you have received a top copy and if not whether you would accept the attached notwithstanding the deadline has just passed. A top copy will be forwarded on Tuesday 18 June 2019 if you have not received one to date.

I look forward to hearing from you at your earliest opportunity and apologise for any inconvenience this may cause.

Regards

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17 June 2019

Dear Sir/Madam

Warrington Proposed Submission Version Local Plan 2017 - 2037

IGas Energy PLC (IGas) welcomes the opportunity comment on the **Warrington Proposed Submission Version Local Plan 2017 – 2037** (the Plan) prepared by Warrington Council (the Council). IGas is a member of the United Kingdom Oil and Gas Group (UKOOG), the trade association for the UK oil and gas industry; this response has prepared with regard to the comments made by UKOOG on this consultation and which are supported.

Summary

- The vision and objectives of the Plan are supported and are considered to accord with national policy and guidance. The plan should have regard to the Written Ministerial Statement made by the Secretary of State for the Ministry of Housing, Communities and Local Government dated 23 May 2019 in respect of the National Planning Policy Framework and hydrocarbon development.
- The Plan's policy in respect of Energy Minerals is supported and is considered to be generally in accordance with national policy and guidance. The plan should also have regard to the Written Ministerial Statements made by the Secretary of State for the Ministry of Housing, Communities and Local Government dated 16 September 2015 and 17 May 2018 in respect of hydrocarbon development.
- The Plan would benefit from making reference to the Exploration License and Petroleum Exploration Licenses that cover the majority of the Plan area. Any plan that serves to significantly impede or prevent development for hydrocarbons in areas where they are found and have been licensed by the Government would be contrary to national policy and guidance unless there is strong evidential justification.
- The Plan could be stronger in recognising that minerals can only be worked where they occur; the contribution hydrocarbons make and will continue to make to ensuring a secure and diverse sustainable energy supply; that the use of hydrocarbons will contribute in moving towards a carbon neutral economy and reducing the impact on climate change; and contribute to achieving the Plan's objectives for sustainable development.

- IGas's comments in respect of those policies considered to be the most relevant to the industry are set out below.
- Petroleum Licence Areas should be included on the Policy Map.
- IGas supports those comments made by UKOOG in response to the consultation on the Plan.

Background

IGas is a British company listed on the Alternative Investment Market of the London Stock Exchange. It is a leading UK onshore oil and gas exploration and production business, holding a portfolio of production and exploration assets, many of which it both owns and operates, primarily focused on three regions: the North West, East Midlands and the Weald Basin in Southern England.

In the North West, IGas holds interests in Exploration Licence 273 and Petroleum Exploration Development Licences 145 and 193, large parts of which fall within the boundaries of the Plan area.

Through the UK onshore licensing regime, IGas has made commitments to Government to explore whether hydrocarbons exist within the licence areas and establish if the UK has a viable onshore oil and gas resource.

IGas supports the process of local plan and strategic framework considerations; it would like to ensure that any proposed plan or strategic framework with respect to onshore oil and gas is sound, and meets with the criteria and policies outlined by Government in the National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG) and related Written Ministerial Statement(s) (WMS).

In particular, IGas is concerned that any policy framework that would significantly impede or prevent development in areas where minerals are found and have been licensed by the Government for hydrocarbon development, would be contrary to national policy unless there is strong evidential justification.

The planning process for onshore oil and gas is one of five regulatory processes that are required under the current policy framework set by government. It is considered, that the Plan should reference each regulatory function and identify those areas which fall outside of the planning process. Paragraph 183 of the National Planning Policy Statement states: "*The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities*". Paragraphs 012 and 112 of Planning Policy Guidance – Minerals make clear that planning authorities are not responsible for matters covered by other regulatory regimes. Paragraph 112 states, mineral planning authorities, "*should assume that these regimes will operate*

effectively. Whilst these issues may be put before mineral planning authorities, they should not need to carry out their own assessment as they can rely on the assessment of other regulatory bodies." This planning policy principle has been re-confirmed in a number of legal cases (Frack Free Balcombe Residents Association v West Sussex CC 2014). Paragraph 183 of the National Planning Policy Statement: *The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.*

It is considered the Council's Vision and Objectives are compatible with protecting and enhancing the natural and built environment and quality of life, ensuring the prudent use of resources as well as supporting growth and innovation. The continued development of onshore oil and gas operations, which develop a domestic resource for a domestic demand at high standards of working practice and environmental protection, is a positive contribution to the UK economy. The alternative is to rely on increased quantities of energy imports, effectively offshoring and outsourcing our capacity without having any influence on how, or in what manner, those minerals have been won, or the impacts of how they are delivered most particularly in transport emissions.

Context for oil and gas

In its response, UKOOG has set out the context of demand and supply for oil and gas and the dependence on such for the foreseeable future. It is clear that, even with a reduction in demand for hydrocarbon resources and further developments in the use of alternative technologies, there will be a continued reliance on the use of hydrocarbons to deliver a sustainable society for the foreseeable future in the transition to a zero carbon economy.

UKOOG also demonstrates the inevitable reliance by the nation on energy imports, the sources and carbon footprint of such and the need to ensure a diversity of energy supply and security; IGas supports those views. The Committee on Climate Change's report 'The Compatibility of UK Onshore Petroleum with meeting the UK's carbon budgets', concluded that a UK shale gas industry would be compatible with the UK's carbon targets, so long as three key tests were met.

These are:

1. Well development, production and decommissioning emissions must be strictly limited.
2. Gas consumption must remain in line with carbon budget requirements.
3. Production emissions must be accommodated within carbon budgets.

IGas supports the ambitions of the Climate Change Act (2008) and sees a key role for UK shale in the transition to a low carbon economy; IGas is of the view that an energy mix including gas, oil, nuclear and renewables is very important to achieve

decarbonisation goals. IGas is also of the view that the production of shale gas can meet the tests by applying best available techniques; exploit an indigenous resource reducing reliance on imports and meeting carbon budget requirements; and continue to develop technologies to reduce the carbon footprint of production, which, irrespective, is currently very low.

Notwithstanding the recent changes to the NPPF in the deletion of part (a) to paragraph 209, parts (b) and (c) continue to be in place and the Government has confirmed the national position on hydrocarbons in its most recent Written Ministerial Statement of 23 May 2019. IGas is of the view that this should be taken into account in the Plan:

‘On the 6th of March 2019, Mr Justice Dove handed down his judgment in the case of Stephenson vs SoS MHCLG [2019] EWHC 519 (Admin). In accordance with the terms of the Court Order, paragraph 209(a) of the National Planning Policy Framework has been quashed.

For the avoidance of doubt the remainder of the National Planning Policy Framework policies and, in particular, Chapter 17 on ‘Facilitating the Sustainable Use of Minerals’ remain unchanged and extant.

For the purposes of the National Planning Policy Framework, hydrocarbon development (including unconventional oil and gas) are considered to be a mineral resource. Specific policy on the planning considerations associated with their development is set out at paragraphs 203-205 and the remainder of 209 of the National Planning Policy Framework. In particular, paragraph 204(a) of the National Planning Policy Framework states that planning policies should “provide for the extraction of mineral resources of local and national importance” with paragraph 205 stating that “[w]hen determining planning applications, great weight should be given to the benefits of mineral extraction, including to the economy”.

In addition, the Written Ministerial Statements of 16th September 2015 on ‘Shale Gas and Oil Policy’ and 17th May 2018 on ‘Planning and Energy Policy’ also remain unchanged and extant. The Written Ministerial Statements sit alongside the National Planning Policy Framework. Planning Practice Guidance is also unaffected by the ruling.

This suite of policies and guidance remain material considerations in plan making and decision taking for hydrocarbon development and they should be afforded appropriate weighting as determined by the decision maker.

We remain committed to the safe and sustainable exploration and development of our onshore shale gas resources.’

With regard to Planning Practice Guidance, the following statements are also considered to be important in respect of hydrocarbons:

- Government energy policy supports the development of onshore oil and gas in the UK as part of the energy mix (**PPG 124**).
- The national need for unconventional hydrocarbon exploration, from resources such as shale and coal seams, is recognised as "pressing" (**PPG 091**).

- *Mineral planning authorities should take account of government energy policy, which makes it clear that energy supplies should come from a variety of sources. This includes onshore oil and gas, (PPG 124)*
- Mineral Planning Authorities should include policies setting out criteria for development, including "*criteria for the location and assessment of hydrocarbon extraction*" (PPG 106).
- Mineral Planning Authorities should include Petroleum Licence Areas on their policies maps (PPG 106).

Spatial Portrait and Vision

The Plan identifies Challenges and Opportunities, the latter of which are identified in 2.2.4. Geologically, the Plan is well placed to realise the benefits on on-shore oil and gas exploration and the inherent benefits it could bring to supporting a successful and developing economy and contributing to the vision for more energy efficiency. IGas supports the objective (W6) to '*minimise the impact of development on the environment through prudent use of resources and ensuring development is energy efficient, safe and resilient to climate change and makes a positive contribution to improving Warrington's air quality*'. However, given the scale of future development provided by the Plan through the Plan period, there will be considerable increase in demand for energy resources. Notwithstanding the aims of the Plan to ensure development is energy efficient and resilient to climate change, onshore oil and gas production can make a significant contribution by delivering energy that is essential to the transition to a low carbon economy and reduce the reliance on overseas supplies and how they are delivered thereby reducing emissions and improving air quality.

Policies

The following policies are those considered to be most relevant to the oil and gas industry and upon which IGas would comment as follows:

Policy DEV4 - Economic Growth and Development

IGas supports the proposed policy to deliver economic growth and development in the Warrington area in accordance with national policy which states '*planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.*'

IGas is of the view that onshore oil and gas production can deliver significant economic benefits to the Plan area including employment and tax revenue for the Council.

Paragraph 4.2.23 states '*The Policy also seeks to ensure that local residents have the opportunity to benefit from Warrington's economic growth and development.*' As part of the UKOOG community engagement charter IGas has committed to giving 1% of the revenue of shale gas production sites to the local community and £100,000 for exploration sites that involve hydraulic fracturing. These funds can be used in a variety of ways including for example the delivery of local community projects.

It is important the Plan recognises that all minerals, including oil and gas, can only be worked where they occur. In particular at an exploration stage sites are chosen following an extensive assessment of geological structures and formations in order to choose sites for future development. Without this ability to enhance the geological knowledge at the exploration stage, the opportunity for further development would be constrained. Beyond geological considerations, sites in the most appropriate location would be chosen which would minimise local impact and maximise economic recovery, taking into account amongst other things, local transport accessibility, access to water and access to local energy grid networks.

Given the contributions minerals could make to deliver the intentions of this policy, it would be beneficial for the Plan to provide further information regarding minerals per se, and particularly onshore oil and gas exploration. Such exploration can be undertaken on relatively very small sites over short periods of time. However, development of this nature would not be considered to constitute rural development but for other reasons may need to be located within designated areas.

Paragraph 4.2.8 of the supporting text acknowledges that Warrington is the home to a number of specialist employment clusters including energy. This is more fully referred to in Paragraph 4.2.24 where it is advised that Fiddlers Ferry power station is likely to be decommissioned over the coming years, and the land could *'come forward for development and represents a major future brownfield redevelopment opportunity for new employment uses'*.

Paragraph 4.2.25 states the site is *'ideally suited to power generation, being connected to the National Grid with supporting infrastructure on-site, having rail and road transport links, benefiting from a supply of cooling water and having a skilled workforce.'*

IGas supports the approach of the policy and supporting text that could facilitate gas exploration and more particularly the opportunity for power generation given the existing energy connections to the grid. IGas would encourage recognition of the PEDL areas that cover the Plan area and, subject to successful exploration, the opportunity to generate energy as part of the transition to a low carbon economy. Further, Paragraph 106 of Planning Policy Guidance – Minerals, states Mineral Planning Authorities should include Petroleum Licence Areas on their policies maps. It does not appear this is the case on the Policy Map to the Plan; although it is acknowledged that 9.3.7 refers to such, the PEDL areas should be identified on either the Policy Map or as an insert in support of Policy ENV5.

Policy GB1 - Green Belt

IGas recognises the importance of the Green Belt and the need to protect it in accordance with national policy. It also recognises the need for the Plan to redefine Green Belt boundaries to accommodate growth in the development of housing and employment land. IGas supports the policy allowance (GB1:11) which states *'other forms of development defined in national planning policy to be an exception to inappropriate development within the Green Belt, will be supported, subject to meeting other relevant Local Plan policies and any relevant Supplementary Planning*

Documents. Paragraph 5.1.21 states *'National Policy defines limited forms of development which are appropriate in the Green Belt and confirms that very special circumstances are required for 'inappropriate development'. The Council will apply this national policy in assessing proposals in Warrington's Green Belt. 'However, national policy clearly advises there are other forms of development which are not inappropriate in the Green Belt provided they preserve the openness and do not conflict with the purposes of including land within it (Para 146). Mineral extraction is identified as one of these forms of development. More particularly, oil and gas development sites are temporary in nature (particularly through the exploration stage) and usually only require very small sites relative to other types of mineral extraction operations. Following exploration, appraisal and or production, a hydrocarbon site will be reclaimed in line with best practice required by the UK's strict regulatory regime. In the case of hydrocarbons this usually means a site can be reinstated back to its former use without any physical change to the topography, more than what can be said for many other types of mineral operations without the need for reinstatement using imported materials.*

UKOOG's report *'Developing shale gas and maintaining the beauty of the British countryside'*¹ explains that a typical ten well shale gas site would be very discreet. In terms of land use, they would more likely to be considerably smaller than an aggregates quarry. In energy terms, to generate the same amount of energy from a wind or solar farm as would be expected from a shale gas site – the land use required could be 450 to 750 times as great. Therefore, in order to minimise land use associated with onshore energy production, onshore oil and gas is a viable choice.

The UK onshore oil and gas industry has a long history having drilled over 2100 wells, many of which are in countryside, Green Belt or sensitive landscape areas and operate with very little impact due to careful site selection and screening. It is important to ensure that developments of this nature would not be seen as inappropriate in the Green Belt and could be supported.

Policy INF3 – Utilities and Telecommunications

Policy INF3 requires all development proposals to demonstrate how developments will connect to public utilities infrastructure to support development (1). The list of services includes gas, demonstrating the expected continued use of gas as an energy supply. Point 6 requires:

'Development proposals for new, expanded or improved utility service infrastructure providing essential services and facilities, including electricity supply, gas or heating supply, water supply and waste water management, that comply with other relevant Plan policies will be permitted provided they can demonstrate that there is an identified need for such a facility within the Plan area, which cannot be met through existing facilities and that they minimise environmental harm, and provide adequate mitigation measures, in light of operational requirements and technical limitations.'

¹[http://www.ukoog.org.uk/images/ukoog/pdfs/Developing Shale Gas and Maintaining the Beauty of the British Countryside.pdf](http://www.ukoog.org.uk/images/ukoog/pdfs/Developing_Shale_Gas_and_Maintaining_the_Beauty_of_the_British_Countryside.pdf)

IGas welcomes the recognition in the Plan that future development proposals will continue to rely on gas and supports the Policy. It is expected that gas will continue to be used as part of the transition to a zero carbon economy and the use of onshore gas in the UK offers more certainty of supply and generates less impact on climate change than imported gas.

Policy DC3 – Green Infrastructure

Policy DC3 (4) seeks to protect, enhance and extend green infrastructure within the Plan area. In particular it seeks to *‘secure a net gain in biodiversity’* (1.4.a) and *‘to help adapt to flood risk and mitigate the impacts of climate change’* (1.4.d).

IGas supports the opportunity to secure net gain in biodiversity. The onshore oil and gas industry has been actively engaged with Natural England (a statutory consultee for onshore oil and gas development), and UKOOG has submitted a response to their net-gain proposals. Whilst the industry agree with the proposals in principle, it considers that it may not always be appropriate to exploration sites, which are temporary in nature, although it is acknowledged that contributions to offsite mitigation or enhancement could be provided.

With regard to the requirement to *‘mitigate to the effects of climate change’*, onshore sites are managed to minimise risk and are governed by strict Environmental Permits administered by the Environment Agency which allow for certain emissions using best available techniques mitigation particularly for exploration sites and by the Oil and Gas Authority in how operations are carried out. It is important to recognise that the requirement to minimise the impact on climate change is relevant to the operations on the site and **not** the impact of gas produced.

Policy DC4 - Ecological Network

This Policy identifies the need to protect and where possible secure a net gain for biodiversity across the Plan area. There are strict conditions already set out by legislation, such as that accompanying the Infrastructure Act 2015 as to where onshore oil and gas sites can be located. For example, development in sites of special scientific interests are not permitted. Notwithstanding minerals can only work where they occur, IGas supports the policy and will work closely with the Council to identify suitable site locations for development opportunities.

Policy DC6 - Quality of Place

IGas agrees with and supports Point 4 of the Policy *‘Energy Efficiency’* which requires development proposals should:

- a. *Encourage the introduction of environmental design principles and climate change adaptation features in the orientation of buildings and spaces and other detailed design;*
- b. *Reduce energy and water use through appropriate design;*
- c. *Encourage the use of renewable/low carbon technology as appropriate.*

There are clear moves in the design of developments to reduce and minimise the reliance on hydrocarbons for the production of energy and which are supported.

However, for the foreseeable future there will remain a reliance on the use of oil and gas for energy purposes and under the deepest decarbonisation pathways outlined by the Committee on Climate Change, there is still a recognised demand for the products; and a recognised significant import dependency without increases in domestic production.

It is therefore important to ensure for the purposes of the plan that there is a continued supply of energy from diversified source but including gas to ensure the proposed development opportunities in the plan can be realised.

Planning for Warrington's Mineral Resources

Paragraph 9.3.1 identifies the mineral resources in the Plan area as sourced from the BGS Report CR/05/090N. However, this falls short of the minerals referred to in the Report which also includes crushed rock, building stones, brick clay and more particularly hydrocarbons. The BGS report was published in 2006 and appears to focus on conventional rather than unconventional hydrocarbons. Considerable developments have been made in the exploration of unconventional oil and gas since the report was published. Whilst reference to Petroleum Exploration and Development Licences (PEDL) is made in Paragraph 9.3.7, it is considered that the list referred to in Paragraph 9.3.1 should refer to all the minerals listed in the BGS report including hydrocarbons. It is further considered that the boundaries of the PEDLS should be identified on the Policy Map or as an insert in support of Policy ENV5 as required by Paragraph 106 of PPG – Minerals.

Policy ENV3 - Safeguarding of Minerals Resources

IGas fully supports Paragraph 9.3.8:

'Minerals are finite resources and their conservation and waste minimisation are important planning considerations. In order to conserve mineral resources every effort must be made to ensure that where practicable mineral bearing land is not sterilised by development and the value of mineral is identified for appropriate end uses.'

Point 4 of Policy ENV3 states that;

*'Planning applications for development **within 250m of safeguarded areas** will need to demonstrate that impacts, e.g. noise, dust, light and air emissions, that may legitimately arise from the activities taking place in safeguarded areas would not be experienced to an unacceptable level by occupants of the proposed development and that vehicle access to and from the area would not be constrained by the development proposed.'*

Whilst it is noted that safeguarded areas do not (understandably) include PEDL licence areas it is important and should be made clear that the policy would equally apply to any future exploration site.

Policy ENV5 – Energy Minerals

IGas welcomes the commitment in Policy ENV5 to support proposals for energy minerals subject to the meeting of the criterion set out in the Policy and particularly the following section:

Exploration and appraisal of hydrocarbons

2. Planning permission will be granted for proposals for exploration and appraisal of oil and gas resources, within areas benefiting from a Petroleum Development Licence (PEDL), provided that:

a. the site and equipment is sited at a location where it can be demonstrated that it will accord with all other policies of the Local Plan in relation to the protection of the environment, public amenity and sustainable transport;

IGas agree with the principle of this part of the Policy but reiterate previous comment that potential sites are identified based on geology and where the minerals are found; the plan should acknowledge this. Further, the Policy requires demonstration that a proposal accords with ‘*all other policies of the Local Plan.....*’. Each application must be considered on its merits. It is not always possible for developments to accord with ‘*all other*’ (relevant) policies in the Plan and any assessment must have regard to the level of impact and any mitigation proposed. In circumstances involving hydrocarbons, greater weight should be attached to proposals which are in the national interest. It is therefore proposed the requirement to accord with ‘*all other*’ policies be made more flexible.

b. the proposal provides for appropriate baseline monitoring prior to commencement of development;

IGas agree that baseline monitoring of sites prior to commencement is important, providing they relate to environmental baselines that are relevant to planning; this approach is already subject to industry best practise. However, the policy is not clear on what are ‘appropriate’ or what baseline information is required. For example, an ecological or highway condition baseline would be appropriate and acceptable whereas a public health baseline would not. It may also be the case that some baseline monitoring should be a matter for the Environment Agency in accordance with Planning Policy Guidance on hydrocarbons. Paragraph 113 states....” *they should not need to carry out their own assessment as they can rely on the assessment of other regulatory bodies*’. The criterion should be made clearer and explained in the supporting text. It would also assist if the supporting text refers to the different regulators for on shore oil and gas and their respective roles and responsibilities.

c. the timely restoration and subsequent aftercare of the site is secured, whether or not oil or gas is found.

IGas agree with this criterion. It should be noted that below the ground activities are governed by the Health and Safety Executive and the Oil and Gas Authority as part of their ongoing regulatory remits and therefore local authorities are only required to look at surface issues. As stated above, the Plan would benefit from an explanation of the roles and responsibilities of the other regulatory bodies.

Commercial exploitation of hydrocarbons

3. *Planning permission will be granted for proposals for commercial exploitation of oil and gas, provided that:*

a. a full appraisal programme for the oil or gas field has been completed;

IGas does not support this criterion. It is not clear what a *'full appraisal programme'* actually means. Irrespective, it is considered to be irrelevant in terms of planning as each application must be considered on its merits. The appraisal of a licence which may include a *"field"* or more than one field is a regulatory function of the Oil and Gas Authority through their licencing process. It is considered this criterion should be excluded from the Plan.

b. the proposed location is the most suitable, taking into account environmental, geological and technical factors;

IGas agree with the principle of this criterion but are of the view that the term *'most suitable'* should be clarified and should recognise the geology first nature of exploration, appraisal and production as referred to above. Further, it is not clear what *'technical factors'* refers to; these should similarly be clarified.

c. the cumulative impacts of the development of the gas field and essential associated infrastructure have been assessed;

IGas does not support this criterion. The development of a gas field is a matter for the Oil and Gas Authority. Applications should be treated on their own merits. The scale of future development may not be known as the results of one well may determine the viability of future developments or otherwise. Cumulative assessment should be based on existing development rather than future development and the criterion should be amended to reflect such.

d. proposals accord with all other policies of the Local Plan in relation to the protection of the environment, public amenity and sustainable transport.

IGas agree with the principle of this criterion but would refer to comments made above in respect of the requirement to accord with *'all other policies'*.

IGas is of the view that the Plan should reiterate that Warrington should *'plan positively'* for onshore oil and gas development, as well as distinguishing the phases from development as set out in Planning Policy Guidance.

The local plan should also have regard to the further Written Ministerial Statement of 23 May 2019 referred to above.

IGas supports Point 5 of the Policy relating to coal.

Policy ENV6 – Restoration and Aftercare of Mineral and Waste Sites

IGas supports the Policy and criterion providing they only apply to planning matters and do not overlap or interfere with the responsibility of other regulators as referred to above.

Policy ENV8 - Environmental and Amenity Protection

IGas supports the intention of the Policy. However as referred to above, it should be noted that minerals can only be worked where they are found – the geology first approach. Matters such as air quality and water quality are for other regulators to address in accordance with their own permitting processes, namely the Environment Agency.

Conclusion

IGas welcomes the opportunity to comment on the draft Plan at this stage in the process and is generally supportive of the proposed policies. It is hoped the above comments are helpful in developing the Policies and we look forward to further involvement in the next stage of the plan process.

Yours faithfully

Steve Bowler

Steve Bowler
Chief Executive Officer IGas