



Rt Hon Angela Rayner
Ministry for Housing
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Wednesday 3rd September

Dear Secretary of State,

Deleting “Great Weight” for Oil and Gas Extraction – NPPF/NDMP Consultations

We write on behalf of a coalition of NGOs (including Greenpeace, National Trust, The Wildlife Trusts, Coal Action Network and Wildlife and Countryside Link) to ask you to use forthcoming policy reviews as an opportunity to deliver on your manifesto commitment to end the licensing of new oil and gas developments.

Currently new oil and gas applications are actively encouraged within the Town and Country Planning 1990 (TCPA) system. This is despite the contribution that new oil and gas will have in increasing climate damage and the enormous social injustice affecting those on lowest incomes in the UK and overseas, as a result.

The International Energy Agency (IEA) made clear in its Net Zero Pathway that there is no need for new oil and gas fields beyond those already approved’ [\[1\]](#). Yet, as currently written, the National Planning Policy Framework (NPPF) gives “great weight” in favour of oil and gas extraction. Given the climate emergency, we believe it is untenable to allow any new fossil fuel projects to go ahead. Our request is simple: for the government to **disapply the “great weight”** apportioned to the **“benefits” of mineral extraction from oil and gas** (para 224 NPPF) to discourage future development, as well as other suggested amendments – see Appendix.

Over many years community groups up and down the country have battled valiantly against fracking and oil and gas extraction, in the face of vocal support for these projects from the then Conservative government. Reform UK is now championing further oil and gas extraction (including fracking). Friends of the Earth was pleased to stand alongside these communities and support them. Many of these communities celebrated the Labour victory at the last election, including its commitment to end new oil and gas exploration and extraction. They will feel very let down if this manifesto commitment is not delivered for land-based fossil fuel extraction.

We welcomed your rapid review of the NPPF once you took power to reverse the constraints on onshore wind inserted by the previous government. We understand you will be carrying out a further review of the NPPF over coming months. We also understand you are developing powerful new National Decision Making Policies (NDMPs) [\[2\]](#). We ask that you use these to implement what is a **long overdue policy shift away from outright support of new oil and gas extraction** in the planning

system (as the previous administration did for coal in 2018^[3]). In the Appendix we suggest how these changes could be implemented.

Changing planning policy in this way for the better will show leadership on climate change when some other political parties seek to ignore the impacts from rising sea levels, increased flood risk, prolonged heat stress, a further depleted natural environment and the disproportionate impact these have on low-income households and developing countries. It will also demonstrate the government's commitment to the well-being of future generations, which as we know is a concern of voters across political divides.

We trust you see the merit and importance of our request. We would be very happy to meet you or your officials to discuss this further.

Yours faithfully,

Mike Childs (Head of Science, Policy and Research) **Friends of the Earth**
Magnus Gallie (Senior Planner), **Friends of the Earth**

Other NGOs in support:

Richard Benwell (CEO) **Wildlife & Countryside Link**
Anthony Collins (Policy Lead) **Coal Action Network**
Doug Parr (Chief Science and Policy Director) **Greenpeace**
Matthew Browne (Head of Public Affairs) **Wildlife Trusts**
Dr Naomi Luhde-Thompson (Chief Executive) **Rights Community Action**
Dan Stone (Senior Policy Officer) **Centre for Sustainable Energy**
Jackie Copley (Campaigns Lead) **CPRE/Countryside Charity**
Ingrid Samuel (Placemaking and Heritage Director) **National Trust**
Ruth Bradshaw (Policy and Research Manager) **Campaign for National Parks**

APPENDIX – Detail: Proposed Policy Amendments

NDMPs

The Levelling Up and Regeneration Act 2023 suggests NDMPs will have more powerful statutory weight in the decision-making process, compared to the material weight of the NPPF. For plan makers at a local level, as well as decision makers, a poorly worded energy mineral NDMP could have *negative* ramifications linked to oil and gas developments for years to come. This is because neither local policy can contradict the content of an NDMP, nor decision makers ignore unless material considerations “strongly indicate otherwise”^[4]. Despite this fundamental change in NDMP policy weighting, there has been little indication as to their substantive detail and whether they will cover climate change mitigation/adaptation or energy minerals.

At the same time as amending the NPPF (i.e. para 224 - see below), we would ask the government to take a complimentary approach to any relevant NDMP wording, should one be designed to cover energy minerals directly (although this might also not be the case). We would ask this echo the disapplication of “great weight” from oil and gas exploration we ask for in the NPPF below.

NPPF

Principle Amendment: Great Weight

224. When determining planning applications, great weight should be given to the benefits of mineral extraction, including to the economy⁷⁸.

⁷⁸ Except in relation to the extraction of **[INSERT] oil, gas (including all volumes of fracking) and coal, the latter** where the policy at paragraph 230 of this Framework applies

Key material planning policy considerations linked to oil, gas and coal extraction – collectively known as “energy minerals” – are contained within the NPPF. Since its first iteration in 2012, it has undergone a series of fundamental updates, including most recently, the welcome reinstatement of support for onshore wind^[5] in recognition of the need to ramp up renewable energy production (to align with mitigation targets in our legally- binding [UK Carbon Budgets](#)^[6]).

The NPPF is a key **material consideration** in the decision-making process for energy minerals. Both councils, when considering oil and gas (including fracking) applications, and local communities, in responding to consultations, remain at the mercy of the “great weight” applicable to the benefits of their extraction (Para 224). Such unfair positive weighting often trumps the many negative adverse “significant” (in EIA terms) land-use impacts of oil and gas production, which is wholly unfair to communities, and dangerous for the climate, which takes successive cumulative GHG hits in the short and the longer term.

The fact remains that new fossil fuel exploration continues to introduce both fugitive (“unintentional” leaks at well sites^[7]) and “down-stream” / “Scope 3”^[8] GHG emissions, with the fuel supply industry remaining “one of the largest contributors to UK methane emissions... 7–8 per cent of UK methane emissions are attributable to fuel supply” (para 213 – [Methane, Keeping Up the Momentum 2024](#)).

Logic suggests the need for an effective policy counterpoint in the NPPF: as a minimum the **disapplication of “great weight” given to oil and gas extraction**, as has been the case for [coal extraction](#) since the NPPF’s 2018 amendment^[9].

[1] See IEA Net Zero Pathway 2021 - <https://www.iea.org/reports/net-zero-by-2050>

[2] Formerly known as National Decision Making Policies.

[3] Support for coal developments was withdrawn following an NPPF review in 2018 – see footnote 65 in [national archives](#):

[4] See [LURA 2023 section 92 \(b\) 5B](#): “... determination must be made in accordance with the development plan and any national development management policies, taken together, unless material considerations strongly indicate otherwise.” -

[5] following the withdrawal of such support in 2016 and replacement with a stringent local community acceptance test, as well as identification within “suitable areas” in local plans.

[6] NB Carbon Budget 7 calls for a doubling of onshore wind capacity to 32 GW by 2040

[7] See Chapter 6: “Methane – Keeping up the Momentum” (Environment and Climate Change Committee). **Fugitive emissions** are unintentional releases of gases from pressurised equipment or facilities in the oil and gas industry. These emissions can come from a variety of sources such as badly maintained or defective equipment such as pumps, compressors or seals. <https://publications.parliament.uk/pa/ld5901/ldselect/ldenvcl/45/4509.htm>

[8] See landmark ‘Finch’ ruling from 2024 <https://friendsoftheearth.uk/climate/horse-hill-historic-win-supreme-court-upholds-landmark-climate-case>

[9] See footnote 4 above for change – but also based on recognition of need to meet our binding carbon budgets.