



**Friends of
the Earth
Scotland**

Friends of the Earth Scotland

Written submissions in Planning Permission Appeal PPA-240-2032

COAL BED METHANE PRODUCTION, INCLUDING DRILLING, WELL SITE ESTABLISHMENT AT 14 LOCATIONS AND ASSOCIATED INFRASTRUCTURE AT LETHAM MOSS, FALKIRK FK2 8RT Falkirk (P-12-0521-FUL) and Stirling (12/00576/FUL)

1. This statement is submitted on behalf of FoE Scotland; FoE Falkirk; FoE Stirling; and supported by Transition Stirling (**referred to as FoE Scotland**).

Inquiry Session 3

2. FoE Scotland note that this session will cover:

- Effects on the community (defined as 'cultural heritage' by CCoF)

3. We do not wish to make any representations in this Session other than to note full support for the excellent work of Concerned Communities of Falkirk on the important subject of cultural heritage in its broader form.

Inquiry Session 4

4. FoE Scotland note that this session will cover the following topics:

- National and local policy (including planning policy, climate change policy and energy policy)
- Benefits of the proposal

5. We have already covered the issues of national and local policy in our inquiry statement. Our witnesses on climate change overlap in their evidence on the topic of change change policy and to a degree energy policy. In relation to the benefits of the proposal, we do not intend to lead any evidence, but would make the following written submissions. In addition, we would intend, if able to, to cross-examine witness for the applicant and other parties (if applicable) on the issues raised.

6. The DPEA is asked to refer to the inquiry statement on national and local policy, and also the hearing statement insofar as it raises issues on SPP, which although considers SPP insofar as conditions are concerned, overlaps with this session. For the ease of reference, we have reproduced the substance of these submissions here, with additional comments on Planing Policy.

National Policy

7. It is our position that Scottish Government energy¹ and planning policy do not support unconventional gas extraction.

- **Scottish Planning Policy**

8. The new draft Scottish Planning Policy (SPP) has removed any presumption in favour of unconventional gas that could have been read into the previous SPP, introduced more stringent guidelines for how Local Development Plans should deal with the industry, and introduced the need for buffer zones between sites and communities. The Scottish Government has confirmed its intention to ensure that this requirement remains in the final SPP.

9. We note that the Scottish Government's position statement has adopted erroneous language from the independent analysis of responses to the SPP in relation to input on unconventional gas extraction.² The statement under Key Issue 9 that "A campaign comprising 364 responses and a petition of 245 signatures opposed the potential extraction of coal bed methane by hydraulic fracturing (fracking)" misrepresents what the petition called for and campaign responses³ said. Neither mentioned hydraulic fracturing (commonly referred to as fracking) but rather call for 'a ban on the unconventional gas industry' and buffer zones 'between communities and onshore gas drilling sites.'

10. Further, we note that the Scottish Government has synchronised the National Planning Framework (NPF) 3 and Scottish Planning Policy (SPP) 2 consultation processes in recognition that the obligatory NPF Parliamentary scrutiny process might helpfully influence SPP. Therefore, the draft SPP is currently undergoing scrutiny by four Parliamentary committees as part of the statutory 60-day process for NPF. The Economy, Energy and Tourism Committee are taking evidence on unconventional gas extraction.⁴ NPF3 and SPP2 are expected to be finalised in June 2014.

11. We have welcomed the emphasis on delivering a low-carbon Scotland and on meeting our climate targets in both the SPP and NPF. However NPF3 fails to deliver on these commitments in a number of areas, particularly transport, and SPP does not reflect the urgency of the need to decarbonise throughout the subject sections.⁵

- **Energy Policy**

12. Dart's proposals would lead to gas being produced from this field for 25 to 30 years. Gas could still be being produced in the late 2040s. The main uses of natural gas are in electricity generation and for heating. In both areas Scottish Government policy is moving away from the use of all fossil fuels, leaving little or no market for CBM gas in the future.

13. In a recent Parliamentary Answer the First Minister stressed Scotland's over-abundance of fossil fuels, saying "We are a country that produces seven times the hydrocarbons that we consume. We

¹ Scottish Government Electricity Generation Statement 2012 <http://scotland.gov.uk/Resource/0038/00389294.pdf>

² Scottish Government Position Statement on Scottish Planning Policy January 2014

<http://www.scotland.gov.uk/Resource/0044/00441852.pdf> Key issue 9, page 8-9. See also emails between Friends of the Earth Scotland and the Scottish Government clarifying this error.

³ <http://www.scotland.gov.uk/Resource/0043/00431251.pdf> and <http://www.scotland.gov.uk/Resource/0043/00431648.pdf>

⁴ Economy, Energy and Tourism Committee's Call for Views on Scottish Government's draft third National Planning Framework http://www.scottish.parliament.uk/S4_EconomyEnergyandTourismCommittee/Inquiries/Call_for_views_-_NPF3.pdf

⁵ See Friends of the Earth Scotland's evidence to the Economy, Energy and Tourism Committee, 30 Jan 2014 <http://foe-scotland.org.uk/ParliEvidenceNPF3SPP2>

should therefore proceed cautiously on the undoubted opportunities that there are for shale gas in Scotland.”⁶ This same logic applies to coal-bed methane.

14. The Scottish Government’s Electricity Generation Policy Statement⁷ sets out the Government’s commitment to delivering 100% of Scotland’s electricity consumption from renewable energy sources by 2020 and of largely decarbonising the electricity sector by 2030. The document suggests that fossil-fuelled electricity generation will still play a part as long power stations can be fitted with Carbon Capture and Storage (CCS), a technology which is in its infancy. There is a possibility of CCS being installed at small scale at Peterhead gas-fired power station, although the station itself is likely to shut around 2030. There are no other proposals for gas-fired power stations in Scotland and the only existing planning consent, for a new station at Cockenzie, is on hold and does not require CCS to be fitted.

15. The Electricity Generation Policy Statement also repeats the Scottish Government’s commitment to sourcing 11% of heat demand from renewables by 2020 and the target to reduce total final energy consumption in Scotland over the period to 2020 by 12%.

16. The Scottish Government will shortly publish a Heat Generation Policy Statement. The Draft Outline Heat Vision and Draft Heat Deployment Options Guidance from January 2013 reinforces the government’s existing commitment to “achieve a largely de-carbonised heat sector by 2050 with significant progress by 2030 through a combination of reduced demand and energy efficiency, together with a massive increase in the use of renewable or low carbon heating.”

17. With its over-abundance of fossil fuels, strong targets on climate change, energy demand and the transition to low and zero-carbon energy, Scotland has no need of the gas to be produced by this application. Research by leading renewable energy consultants Garrard Hassan demonstrates that Scotland can phase out all fossil fuel and nuclear power by 2030, maintain a secure supply and generate additional electricity for export.⁸

Benefits of the proposal

18. Extravagant claims have been made of cheap energy coming from unconventional gas production but experts from Lord Stern to Lord Browne have stated that there will be no significant reduction in energy prices. Stern described the UK’s dash for gas as founded on ‘baseless economics’,⁹ while Browne, chairman of Cuadrilla Resources has said that shale gas won’t have a ‘material impact’ on gas prices.¹⁰

19. It is self-evident that the limited pot of energy investment will be spread more thinly if unconventional gas is competing with renewables for investment. In England the UK Government’s enthusiasm for both shale gas and nuclear power have resulted in low renewables targets, lack of political support for renewables and no decarbonisation target for the electricity sector. On the other hand the Scottish Government has given strong signals to the industry and market that renewables is the priority.

20. In its 2012 report ‘Golden Rules for a Golden Age of Gas’ the International Energy Agency found “*an abundance of natural gas might diminish the resolve of governments to support low and zero-carbon sources of energy: lower gas prices (and therefore lower electricity prices) can*

⁶ Official Report, Scottish Parliament, 19th December 2013,

<http://www.scottish.parliament.uk/parliamentarybusiness/28862.aspx?r=8720&mode=pdf>

⁷ Electricity Generation Policy Statement 2013, <http://www.scotland.gov.uk/Resource/0042/00427293.pdf>

⁸ Power of Scotland Secured: Summary for Policy Makers and Options for Coping with High Renewables Penetration in Scotland <http://www.foe-scotland.org.uk/power-secured>

⁹ <http://www.independent.co.uk/news/uk/politics/baseless-economics-lord-stern-on-david-camerons-claims-that-a-uk-fracking-boom-can-bring-down-price-of-gas-8796758.html>

¹⁰ <http://www.theguardian.com/environment/2013/nov/29/browne-fracking-not-reduce-uk-gas-prices-shale-energy-bills>

postpone the moment at which renewable sources of energy become competitive without subsidies and, all else being equal, therefore make renewables more costly in terms of the required levels of support.”¹¹

21. PriceWaterhouseCoopers issue a similar warning at the global scale in their ‘PwC Low Carbon Economy Index’, that while shale gas may ‘buy some time’: *“it reduces the incentive for investment in lower carbon technologies such as nuclear and renewables, and could lock in emerging economies with high energy demand to a dependence on fossil fuels.”*¹²

22. At a UK level, exploitation of unconventional gas could also have a major impact on investment in renewable energy. Professor Paul Stevens of Chatham House has written: *“There is a real fear among many analysts that shale gas may substitute not for coal but for renewables”* and *“the anticipation of cheap natural gas could inhibit investment in renewables. But again, if the revolution fails to deliver a lot of cheap gas, by the time this is realized it could well be too late to revert to a solution to climate change based upon renewables.”*¹³

23. The Committee on Climate Change have also written of the dangers of a dash for gas: *“The apparently ambivalent position of the Government about whether it is trying to build a low-carbon or a gas-based power system weakens the signal provided by carbon budgets to investors [is] damaging prospects for required low-carbon investments”*.¹⁴

24. With its over-abundance of fossil fuels, strong targets on climate change, energy demand and the transition to low and zero-carbon energy, Scotland has no need of the distraction of unconventional gas.

¹¹ http://www.worldenergyoutlook.org/media/weowebiste/2012/goldenrules/WEO2012_GoldenRulesReport.pdf

¹² <http://press.pwc.com/GLOBAL/News-releases/current-rates-of-decarbonisation-pointing-to-6oc-of-warming/s/47302a6d-efb5-478f-b0e4-19d8801da855>

¹³ Chatham House August 2012 ‘The ‘Shale Gas Revolution’: Developments and Changes’
<http://www.chathamhouse.org/sites/default/files/public/Research/Energy,%20Environment%20and%20Development/bp0812stevens.pdf>

¹⁴ Committee on Climate Change 13th September 2012 ‘The need for a carbon intensity target in the power sector’
<http://www.theccc.org.uk/wp-content/uploads/2013/02/EMR-letter-September-12.pdf>