

Freepost RRHE-GBSA-BJLR
National Planning Framework Team
The Scottish Government Planning Directorate
Victoria Quay
Leith
Edinburgh
EH6 6QQ

15 April 2008

Dear Sirs

National Planning Framework 2

We enclose our response to the above consultation, on behalf of our clients, Composite Energy. I have also enclosed the Respondent Information Form.

If you have any questions, please let me know.

Yours faithfully



Zoé Anderson
for Geddes Consulting

Enc.

cc Lynne Campbell, Composite Energy

National Planning Framework 2 Consultation Response on behalf of Composite Energy



Consultation response

Geddes Consulting made representations on behalf of Composite Energy at the preparation stage of National Planning Framework 2 to promote the inclusion of onshore gas extraction within National Planning Framework 2 (NPF2). This consultation response welcomes the inclusion of references to Coal Bed Methane within NPF 2, and the direction to Planning Authorities to consider the potential for onshore gas extraction when preparing their development plans.

Composite Energy is pioneering the extraction of coal bed methane from coal seams in Scotland and currently has interest in Petroleum, Exploration & Development Licence (PEDL) 133 which is 500km² and stretches over a number of Local Authority areas in Central Scotland.

This and future licence areas will be inter-authority. Composite Energy welcomes the inclusion of reference within NPF2 (para. 134) to coal bed methane as an energy resource for Scotland.

This is essential to ensure connectivity in the infrastructure necessary to deliver the efficient extraction of this energy resource such as utilities and pipelines. All Councils within a licence area or coalfield need to act in concert with regard to the respective planning policies for on-shore gas extraction in their emerging development plans. Composite Energy welcome the direction within NPF2 for Planning Authorities to consider the potential for onshore gas extraction when preparing their development plans.

We would encourage the Scottish Government to go further and consider producing Planning Guidance or similar to be issued to Planning Authorities to ensure the relevant information on coal bed methane is available to Planning Authorities when preparing their development plans, and to ensure consistency in policy and guidance and co-operation across different planning authorities. It should be statutory for development plans to comply with this guidance.

We consider this approach would allow sufficient flexibility within the Planning System to adapt to changing requirements, with appropriate status to ensure the Strategic Development Plans, and Local Development Plans in areas outwith these, to collectively contribute to meet national targets.

We would also encourage the Scottish Government to consider how the Targets and Guidance within NPF 2 are to be implemented in Strategic Development Plans (and Local Development Plans outwith these areas). We consider that there should be greater clarity on how development plans are to implement the spatial strategy set out in the Framework.

RESPONDENT INFORMATION FORM: NATIONAL PLANNING FRAMEWORK 2

Please complete the details below and return it with your response. This will help ensure we handle your response appropriately. Thank you for your help.

Name:

Postal Address:

1. Which document(s) are you responding to?

- Discussion Draft National Planning Framework 2
- Discussion Draft Environmental Report
- Discussion Draft Environmental Report Non-Technical Summary

2. Are you responding: (please tick one box)

- (a) as an individual go to Q3a/b and then Q5
- (b) **on behalf of** a group/organisation go to Q4 and then Q5

INDIVIDUALS

3a. Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government website)?

- Yes (go to 3b below)
- No, not at all We will treat your response as confidential

3b. **Where confidentiality is not requested**, we will make your response available to the public on the following basis (**please tick one** of the following boxes)

- Yes, make my response, name and address all available
- Yes, make my response available, but not my name or address
- Yes, make my response and name available, but not my address

ON BEHALF OF GROUPS OR ORGANISATIONS:

4. The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government website). Are you also content for your **response** to be made available?

- Yes
- No We will treat your response as confidential

SHARING RESPONSES/FUTURE ENGAGEMENT

5. We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for the Scottish Government to contact you again in the future in relation to this consultation response?

- Yes
- No