Strategic Environmental Assessment Environmental Report

Appendix C. Statutory Authority Responses on SEA Scoping Report

Revision no: 0.2

City of Edinburgh Council

Climate Strategy 2030

August 2022

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Table C.1: Comments from the Statutory Authorities

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| Section | Comment | Our Response |
| **Scottish Environment Protection Agency (SEPA)** | | |
| Relationship with other Plans, Policies and Strategies (PPS) | ‘Cleaner Air for Scotland: the road to a healthier future (Scottish Government, 2015)’. Please be aware of Cleaner Air for Scotland 2 - Towards a Better Place for Everyone Cleaner Air for Scotland 2 - Towards a Better Place for Everyone - gov.scot (www.gov.scot) | Updated the policy review appendix in the Environmental Report. |
| Baseline Information | We are aware that City of Edinburgh Council will have to prepare and action Local Heat and Energy Efficiency Strategy (LHEES) by the end of 2023. This document should be a useful source of information with regards to energy and heat generation, transmission and use across the city area and contain content relevant to the baseline of this strategy. We acknowledge that integrating information from a strategy which is not yet published is complex however the SEA process should be cognisant of this information moving forward. | Updated the policy review appendix in the Environmental Report. |
| Updates to the SEPA pluvial maps are currently underway and the flood map outputs are anticipated to be available in the next 18 months….the SEA could identify them as future additions to the baseline.  The next coastal flood hazard maps to be updated will be for South East Scotland…As with the pluvial maps, however, we want to the potential for other updates to flood maps, including coastal, which should be taken  into account as the climate change strategy (and related PPS) evolve and develop. | Added to the Environmental report baseline. |
| We would support the Council to extend the scope of their assessment to include the transmission of energy within the scope of the Strategy. | Energy transmission is taken forward through the Heat and Energy Efficiency Partnership Board co-chaired by CEC and S P Energy Networks and membership from across the heat and energy sector.  Actions identified in the strategy to partner with SP Energy Networks will ensure a strategic policy approach will be taken to heat and energy and consideration of environmental factors will be incorporated in these workstreams. CEC will look to update the implementation plan to include this environmental consideration. |
| 6.3.1 SEA Objectives | This approach is supported by the Scottish Government’s new clean air strategy – Cleaner Air for Scotland 2 (CAFS2) – Towards a better place for everyone – published in 2021. Further to this the relevant plans, policies and strategies for air quality are outdated, there are new air quality strategies prepared by both the Scottish government (CAFS2) and the UK government (Defra Clean Air Strategy 2019) and the Council are updating their own local plan for air quality. | Updated the policy review appendix in the Environmental Report. |
| Additionally, we recommend the 50 recommendations for maximising co-benefits between air quality and climate change interventions as set out in the CAFS Governance Group climate change report is used to guide the development of the SEA objectives and assessment questions in table 9 for air and climatic factors. | CAFS2 has been added to the Appendix B and the SEA objectives were reviewed with awareness of the CAFS recommendations. |
| We suggest the current questions be amended as follows:  3.9 Contribute to reducing emissions of key pollutants to air from road transport  3.10 Contribute to reducing emissions to air from energy generation and heating  3.11 Contribute towards achieving the aims and objectives of the Council’s Air Quality Action Plan  3.12 Improve air quality within existing AQMAs  3.13 Contribute towards achieving the aims and objectives of the LEZ | Updated SEA objectives guide questions. |
| Environmental Issues and Challenges | Annual progress reports on air quality to the Scottish government and SEPA ….. should be reviewed to adequately understand the air quality issues faced by the council and actions to improve air quality. | Annual progress reports were reviewed in the development of the strategy and will be reviewed as part of the ongoing monitoring |
| The Council should also note the below action in CAFS2 which is highly relevant to the development of the Climate strategy and SEA:  Local authorities working with Transport Scotland and SEPA will look at opportunities to promote zero-carbon city centres within the existing LEZs structure. | CAFS2 has been added to the Appendix B and the SEA objectives were reviewed with awareness of the CAFS recommendations. |
| We suggest [the SEPA Carbon Emissions Tool] is considered in both the strategy and the SEA development to test transport-related assumptions. | At this strategic level we are not proposing to use any carbon tool. The rationale for this was discussed at the Environmental Report workshop with the Statutory Authorities. |
| We also recommend that the SEA refers to the recently updated Dynamic Coast 2 dataset (Dynamic Coast - Reports). | Updated the policy review appendix in the Environmental Report |
| Table 6 | The report states, “need to respond to increased rainfall and implications on surface water within constrained city centre”. We are in agreement with this statement, however we advise this statement is inclusive of all sources of flood risk including fluvial risk, culverted watercourses, tidal  interactions, groundwater etc. | Updated in the Environmental Report. |
| We note there is no reference to the Edinburgh and Lothian Strategic Drainage Partnership, however this may be a key partnership that could help to deliver some of the objectives from the 2030 Climate Strategy and linkages should be considered. | Updated the policy review appendix in the Environmental Report |
| Mitigation and Enhancement | We would encourage you to be very clear in the Environmental Report about mitigation measures which are proposed as a result of the assessment. These should follow the mitigation hierarchy (avoid, reduce, remedy or compensate) | Mitigation and enhancement section has been added to the Environmental report. |
| Monitoring | It would be helpful if the Environmental Report included a description of the measures envisaged to monitor the significant environmental effects of the plan. | Noted and will be considered in the final version of the Environmental report. |
| Outcomes of the Scoping exercise | We would find it helpful if the Environmental Report included a summary of the scoping outcomes and how comments from the Consultation Authorities were taken into account. | All comments received on the scoping report have been presented in this Appendix C. |
| **NatureScot** | | |
| Table 1 | We suggest another key objective might be protecting or adapting the coast to sea level change and erosion, although this could be covered by the Air and Climatic Factors objective ‘Contribute to the response to climate change, through sustainable design mitigation and adaptation’. As well as Air and Climatic Factors this key objective could also apply to Water and Biodiversity. | This objective has been added to Water and Biodiversity in Table 2.1 |
| Baseline Information | We suggest another source of baseline information which is relevant to the coastline is Dynamic Coast (2) | Updated the baseline appendix in the Environmental Report |
| Environmental problems | The need to adapt to the effects of climate change is a cross cutting issue which affects most topics, not just climatic factors and population/human health. For example, coastal adaptation could be seen as a Water issue; possible Firth of Forth SPA squeeze, or more generally habitat resilience, a Biodiversity issue. Within Biodiversity, the results of development fragmenting habitats, as mentioned, means a less resilient network to buffer the effects of climate change, as well as loss of biodiversity. It’s not always clear within the scoping report, that biodiversity addresses both. | Updated Table 2.2. |
| SEA Objectives | Needing to adapt to climate change is a key issue and reflected in the SEA objective ‘Promote and enable adaptation to climate change’. The related SEA question ‘Help adapt the infrastructure network to direct and indirect risks associated with climate change projections for Scotland’ is an all-encompassing question which could cover many things within many topics. As such, it’s perhaps not as smart or as measurable as it could be. For example, infrastructure could be anything from buildings to parks to coastal defences, and many things could help contribute to adaptation, including nature-based solutions. Perhaps it would be more useful to break this question down further, for example ‘protect and increase resilience of...?’ Adaptation itself will benefit most topics, from biodiversity, to climate to population health etc. | Updated the climate guide questions in Table 3.3. |
| There is not a coastal or sea related SEA objective or question within the Water topic….. But perhaps this is included within the adaptation question discussed above. It would be useful to make this clearer in the Environmental Report | Coastal guide question added to Table 3.3. within the Climatic factors objective. |
| Green blue infrastructure or nature based solutions will also be used to help infrastructure adapt to climate change and therefore it may be useful to capture this somehow within the SEA questions. Again this could form part of the adaptation question above, perhaps highlighting the need to explore the questions further around this objective. For example, can nature be used to create, or to assist in creating, climate resilient development? | Guide question added to Table 3.3 to reflect the need for nature-based solutions. This has also fed into the development of enhancements |
| The potential for restoring peatland could be highlighted further within [the SEA questions relevant to peat]. For example ‘Promote soil and peatland restoration to encourage carbon capture’ or ‘protecting and restoring prime agricultural land and carbon rich soils such as peat’ | Updated Table 3.3. |
| **Historic Environment Scotland (HES)** | | |
| Table 6 | It would be helpful for the environmental problems identified for the historic environment to demonstrate a focus on the strategy topic area. For example, to recognise the issues that climate change raises for the historic environment, and also the opportunities and challenges that will arise from the implementation of mitigation and adaptation measures. More information about this can be found here: [Climate Change | Lead Public Body for Scotland's Historic Environment](https://www.historicenvironment.scot/about-us/what-we-do/climate-change/) | Added a guide question around climate change resilience to the cultural heritage objective. |
| SEA Objectives and Assessment Questions | We recommend that you include objectives and assessment questions which reflect the likely aims and outcomes of the Strategy. In the case of the historic environment, this includes assessment criteria which can identify likely effects of adaptation and mitigation measures on the historic environment, and which also identify opportunities for the Strategy to address climate change issues facing the historic environment | Added a guide question around climate change resilience to the cultural heritage objective. |
| Reasonable Alternatives | We would expect all reasonable alternatives considered in the development of the Strategic Actions to be assessed and reported in the Environmental Report to the same level of detail that preferred options are assessed and reported. | Clarification of the process behind the assessment of reasonable alternatives has been included in the Environmental Report. This was discussed in the Environmental Report workshop with the Statutory Authorities. |
| The SEA timeline provided at table 11 discusses public consultation on the Environmental Report but does not refer to consultation on the Strategy itself. For the avoidance of doubt, the consultation should be on both the Environmental Report and the Strategy (the relevant document). | Clarification on the programme has been added to the final table of the Environmental Report. |