

**Directorate for Local Government and Communities**

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D:

Wendy Devall  
Trainee Sustainable Development Officer  
Planning and Sustainable Development  
Communities, Housing and Infrastructure  
Aberdeen City Council  
Marischal College  
Business Hub 4, Ground Floor North  
Aberdeen, AB10 1AB

**01119 Scoping - Aberdeen City Council –  
Powering Aberdeen: Aberdeen's Sustainable Energy Action Plan (SEAP)**

Dear Wendy,

With reference to the Scoping report you submitted to the SEA Gateway on 30 September 2015.

In accordance with Section 15(2) of the **Environmental Assessment (Scotland) Act 2005** the Consultation Authorities have now considered the Scoping report you submitted. The individual responses from the Consultation Authorities to your report are attached to this letter.

As the Consultation Authorities have now expressed their views on the proposed scope and level of detail of the report, you should refer to the Act to consider what your next step should be. You should of course take into account the opinions offered by the Consultation Authorities.

Note, in accordance with Section 15(3) of the 2005 Act (when agreed) you are required to formally write to advise the Scottish Ministers of the period of consultation you intend to specify, both for the public and the Consultation Authorities.

If you have any queries or would like me to clarify any points, please call me on 0131 244 7650.

Yours sincerely

Johnathan Whittlestone  
SEA Gateway Officer



Our ref: PCS/142930  
SG ref: SEA01119/Sco

Wendy Devall  
Aberdeen City Council

If telephoning ask for:  
Cerian Baldwin

By email only to: [sea.gateway@scotland.gsi.gov.uk](mailto:sea.gateway@scotland.gsi.gov.uk)

29 October 2015

Dear Ms Devall

**Environmental Assessment (Scotland) Act 2005**  
**Powering Aberdeen: Aberdeen's Sustainable Energy Action Plan (SEAP) - Scoping consultation**

Thank you for your Scoping consultation submitted under the above Act in respect of the Powering Aberdeen: Aberdeen's Sustainable Energy Action Plan (SEAP). This was received by SEPA via the Scottish Government SEA Gateway on 30 September 2015.

As required under Section 15(2) of the Act, we have considered the document submitted and comment as follows in respect of the scope and level of detail to be included in the Environmental Report (ER). We are generally satisfied with the proposed scope of the ER and have made some minor comments in Appendix 1.

The [Scottish Government SEA Guidance](#) provides guidance to Responsible Authorities about the type of information that is expected to be provided at each SEA stage; we have also produced [Standing Advice for Responsible Authorities on Strategic Environmental Assessment \(SEA\) Scoping Consultations](#). We have used the guidance to inform our detailed scoping response which is attached as Appendix 1.

On completion, the Environmental Report and the Plan to which it relates should be submitted to the Scottish Government SEA Gateway ([sea.gateway@scotland.gsi.gov.uk](mailto:sea.gateway@scotland.gsi.gov.uk)) which will forward it to the Consultation Authorities.

Should you wish to discuss this scoping consultation, please do not hesitate to contact me on 01349 860415 or via our SEA Gateway at [sea.gateway@sepa.org.uk](mailto:sea.gateway@sepa.org.uk)

Yours sincerely

Cerian Baldwin  
Senior Planning Officer  
Planning Service

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## **Appendix 1: Comments on the Scoping consultation**

### **1. Relationship with other Plans, Policies and Strategies (PPS)**

- 1.1 Some of the PPS included have themselves been subject to SEA. Where this is the case you may find it useful to prepare a summary of the key SEA findings that may be relevant to the Plan. This may assist you with data sources and environmental baseline information and also ensure the current SEA picks up environmental issues or mitigation actions which may have been identified elsewhere.

### **2. Baseline information**

- 2.1 We welcome the inclusion of significant amounts of data relevant to our interests and the way this has been utilised to identify priorities. As it is proposed to continually update the Plan it will be important to utilise up to date data. For example our classification of water bodies is updated regularly. Please contact our Access to Information unit at our Corporate Office (Telephone 01786 457700 or email [dataenquiries@sepa.org.uk](mailto:dataenquiries@sepa.org.uk)) when you seek to update the Plan. Additional local information may also be available from our Other sources of data for issues that fall within SEPA's remit are referenced in our [Standing Advice for Responsible Authorities on Strategic Environmental Assessment \(SEA\) Scoping Consultations](#).

### **3. Environmental problems**

- 3.1 We consider that the environmental problems described generally highlight the main issues of relevance for the SEA topics within our remit.
- 3.2 Section 50 of Appendix 7.1 refers to fluvial and coastal flooding. We also recommend that pluvial flooding is considered in terms of the use of sustainable drainage systems and de-culverting. The forthcoming Flood Risk Management Plans which are produced jointly by the local authority in conjunction with SEPA and other stakeholders may assist in identifying priorities.

### **4. Alternatives**

- 4.1 We are satisfied with the alternatives outlined. These should be assessed as part of the SEA process and the findings of the assessment should inform the choice of the preferred option. This should be documented in the Environmental Report.

### **5. Scoping in / out of environmental topics**

- 5.1 We agree that in this instance all environmental topics should be scoped into the assessment.

### **6. Methodology for assessing environmental effects**

- 6.1 We welcome the proposed methodology for assessing environmental effects. We are content with the proposed detailed assessment matrix and particularly welcome the commentary box to fully explain the rationale behind the assessment results. You may wish to consider somehow directly linking the assessment result with proposed mitigation measures such as in the example below:

<b>SEA ISSUES - CHECKLIST QUESTION</b>	<b>Yes or No</b>	<b>Effect</b>	<b>COMMENT and OPPORTUNITIES TO MITIGATE OR IMPROVE</b>
Is the allocation at risk from fluvial or coastal flooding?	Y	Negative	Part of site found to be at risk now removed from allocation.
Could the allocation have a physical impact on existing watercourses?	Y	Negative	Site dissected by watercourse. Developer Requirements includes statement " <i>watercourse to be integrated as positive feature of the development. No culverting.</i> "
Can the allocation currently be connected to the public sewerage system?	Y	Positive	Developer Requirement includes statement " <i>connect to public sewer</i> "

- 6.2 When it comes to setting out the results of the assessment in the Environmental Report please provide enough information to clearly justify the reasons for each of the assessments presented. It would also be helpful to set out assumptions that are made during the assessment and difficulties and limitations encountered.

## **7. Mitigation and enhancement**

- 7.1 We welcome Table 5.4 which identifies what, when and who will take mitigation measures forward. As above, it is useful to show the link between potential effects and proposed mitigation / enhancement measures in the assessment framework.

## **8. Monitoring**

- 8.1 We welcome the approach outlines for monitoring.

## **9. Consultation period**

- 9.1 Section 6.1 and 6.2 give different consultation periods for the Environmental Report however we are satisfied with the proposals for either a 6 or 8 week consultation period for the Environmental Report.

## **10. Outcomes of the Scoping exercise**

- 10.1 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.



## Scottish Natural Heritage Dualchas Nàdair na h-Alba

All of nature for all of Scotland  
Nàdar air fad airson Alba air fad

Sinclair Laing  
Team Leader – Environmental Policy  
Planning and Sustainable Development  
Aberdeen City Council  
Marischal College  
Aberdeen, AB10 1AB

30 October 2015

Dear Sinclair

### **Environmental Assessment (Scotland) Act 2005 01119 Scoping – Powering Aberdeen: Aberdeen’s Sustainable Energy Action Plan (SEAP) Aberdeen City Council**

I refer to your scoping report, sent to the Scottish Government SEA Gateway on 1 October 2015. In accordance with Section 15(2) of the Environmental Assessment (Scotland) Act 2005, I have considered the report in SNH’s role as a Consultation Authority under the above Act.

#### **Scope of assessment and level of detail**

I am generally satisfied with the scope and level of detail proposed for the Environmental Report (ER). I have made some minor comments in the Annex to this letter, primarily in relation to baseline data.

#### **Consultation period for the Environmental Report**

I am content with the 8 week consultation period proposed for the Environmental Report.

#### **Concluding remarks**

I hope that these points are of assistance to you. Please note that this response is in the context of the Environmental Assessment (Scotland) Act 2005 and our role as a Consultation Authority. We understand that we will be separately consulted on our views regarding the Environmental Report. Please note that this response is in the context of the Environmental Assessment (Scotland) Act 2005 and our role as a Consultation Authority.

Yours sincerely

**Ewen Cameron**  
Operations Manager

cc SNH SEA Gateway:  
SEPA SEA Gateway:  
HS SEA Gateway:

[sea.gateway@snh.gov.uk](mailto:sea.gateway@snh.gov.uk)  
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Scottish Natural Heritage, Inverdee House, Baxter Street, Aberdeen, AB11 9QA  
Tel 01224 266500 - Fax 01224 895958 - [www.snh.gov.uk](http://www.snh.gov.uk)

## **Annex: Detailed recommendations from SNH in relation to 01119 Scoping – Powering Aberdeen: Aberdeen’s Sustainable Energy Action Plan (SEAP)**

### **Plan context**

Several of the other Plans and Strategies referred to will have been subject to SEA themselves. Consequently, it may be useful if any key findings from those plans, which are relevant to the SEAP, are summarised in the ER.

### **Environmental Baseline**

1. I would recommend that [2020 Challenge for Scotland’s Biodiversity](#) be added to Table 4.1 after the item at line 44 in the table. This document is an important supplement to the 2004 Biodiversity Strategy.

2. In my response at screening I suggested including the Moray Firth SAC, as its bottle nosed dolphins spend a lot of time around the mouth of Aberdeen harbour and the adjacent coastline and are susceptible to underwater noise disturbance, which could be a significant element of offshore energy generation. Consequently, the Moray Firth SAC should be included in Table 4.3 as an “Environmental problem” against the Biodiversity topic.

3. In the same table, the column for “Implications for Powering Aberdeen” includes the statement: *There are limited woodland and peat soils in Aberdeen which play a role in capturing carbon emissions.* This implies that the role they play is trivial or unimportant and I suspect that is not the impression you wanted to convey. Perhaps this should read: *Although there are limited woodlands and peat soils in Aberdeen which play a role in capturing carbon emissions, their contribution should not be ignored.*

4. These points also need to be carried through and reflected in the relevant Appendices

5. I am very surprised that Appendix 7.2.4 gives SNH as the data source for Local Nature Conservation Sites (LNCS) as that is information which the Council holds itself. While the hyperlink does give information on Local Nature Reserves, SNH doesn’t provide information on LNCS, SWT reserves, RSPB reserves etc.

6. Appendix 7.2.8 - More up to date advice on safeguarding landscape is available from the SNH website at [http://www.snh.gov.uk/policy-and-guidance/policy-documents/document/?category\\_code=Policy&topic\\_id=1088](http://www.snh.gov.uk/policy-and-guidance/policy-documents/document/?category_code=Policy&topic_id=1088)

### **Significant issues**

In Table 4, the most obvious omission is any explicit action which commits Aberdeen City Council to reduce its own energy consumption, waste or increase its own energy efficiency in Council property such as offices, schools, housing, vehicles etc. The success of Repowering Aberdeen will be significantly enhanced if the Council demonstrates it is leading by example.

### **Assessment methodology**

I am content with proposed assessment methodology.

### **Mitigation and enhancement**

The approach to this is welcome but it will be important for the ER to be sufficiently explicit on the mitigation required.

### **Monitoring**

The monitoring proposed in Table 5.5 is a comprehensive and welcome approach.

Buidheann-stiùiridh Cultair, an Roinn Eòrpa agus Cùisean an Taoibh a-Muigh  
Culture, Europe and External Affairs Directorate  
Roinn a' Chultair agus Àrainneachd Eachdraidheil  
Culture and Historic Environment Division

E: LBCCACNotifications@gov.scot



Ms Amy Gray  
Planning & Sustainable Development  
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Business Hub 4, Ground Floor North  
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ABERDEEN  
AB10 1AB



Ur faidhle/Your ref :0119 SCOPING  
Ar faidhle/Our ref :AMN/23/664  
Our Case ID: 201504099  
04 November 2015

Dear Ms Gray

## **Environmental Assessment (Scotland) Act 2005**

Thank you for consulting Historic Scotland on the Powering Aberdeen: Aberdeen's sustainable Energy Action Plan.

On 1 October 2015, Historic Scotland and The Royal Commission on the Ancient and Historical Monuments of Scotland (RCAHMS) ceased to operate and have been replaced by a new organisation, Historic Environment Scotland (HES). This new organisation (which is a Non Departmental Public Body) was established by the Historic Environment Scotland Act 2014.

Consultations received by Historic Scotland before 1 October require a response direct from Scottish Ministers. This letter contains Scottish Ministers' comments for our historic environment interests in the context of our role as a Consultation Authority under the Environmental Assessment (Scotland) Act 2005.

Ministers have sought the advice of Historic Environment Scotland on the Scoping Report. This advice is set out in the Annex below. Ministers are content with the scope and level of detail proposed for the assessment for their historic environment interests, subject to Historic Environment Scotland's comments. If you wish to discuss this advice in further detail, please contact Virginia.sharp@gov.scot; 0131 668 8704) of Historic Environment Scotland.

Yours sincerely

## **Culture and Historic Environment Division**

Cidhe Bhictòria, Dùn Èideann EH6 6QQ  
Victoria Quay, Edinburgh EH6 6QQ  
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## 5.2 SEAP for assessing environmental effects

It is noted that you have not identified any objectives, questions or environmental criteria against which to test the elements of Powering Aberdeen which will be assessed. This approach has the potential to result in an unfocussed assessment which is less likely to identify potential negative or positive effects. The work carried out to identify the plan, programme or strategy context, environmental baseline and relevant environmental problems should form the basis of development of any assessment criteria. The Scottish Government's SEA Guidance (<http://www.gov.scot/Publications/2013/08/3355/3>) provides helpful information on assessment methods.

### Table 5.1: Assessment of Options and Table 5.2: Assessment of SEAP Objectives and Actions

HES welcomes the inclusion within the assessment tables of a column to provide comments. To aid clarity and understanding of the assessment findings, it is important that these comments are sufficiently detailed to allow an understanding of the reasoning which supports the scoring for all topics.