

## Post-adoption Statement for Powering Aberdeen: Aberdeen's Sustainable Energy Action Plan

### PART 1

<b>To</b>	<a href="mailto:Sea.gateway@scotland.gsi.gov.uk">Sea.gateway@scotland.gsi.gov.uk</a> Or SEA Gateway Scottish Executive Area 1 H (Bridge) Victoria quay Edinburgh EH	
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### PART 2

A Post-adoption Statement for the plan entitled

**Powering Aberdeen: Aberdeen's Sustainable Energy Action Plan**

The Responsible Authority is:

Aberdeen City Council

### PART 3

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XXXXX 2016

### INTRODUCTION

This document referred to here as the Post-Adoption SEA Statement) has been prepared in accordance with Section 18 of the Environmental Assessment (Scotland) Act 2005.

#### AVAILABILITY OF DOCUMENTS

##### **Website**

The full PPS as adopted, along with the Environmental Report and Post-Adoption SEA Statement are available on the Responsible Authority's website at:

<http://www.aberdeencity.gov.uk/>

##### **Office Address**

The Full PPS as adopted, along with the Environmental Report and Post-adoption SEA Statement may also be inspected free of charge (or a copy obtained for a reasonable charge) at the principle office of the Responsible Authority.

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##### **Times at which the documents may be inspected and a copy obtained:**

Monday to Friday (0900 – 1700)

## Table of Contents

1.	Key Facts .....	4
2.	Strategic Environmental Assessment Process .....	5
3.	Effects of the Environmental Considerations on the Action Plan .....	7
4.	Effects of the Environmental Report on Powering Aberdeen.....	11
5.	Taking Consultation Opinions into Account .....	17
6.	Reasons for Adopting Powering Aberdeen: Aberdeen's SEAP.....	23
7.	Monitoring Measures.....	23
8.	Conclusion .....	30

## 1. Key Facts

Name of Responsible Authority	Aberdeen City Council
Title of the PPS	Powering Aberdeen: Aberdeen's Sustainable Energy Action Plan
What Prompted the PPS	<p>Development of a SEAP is a commitment of Covenant of Mayors (CoM) which ACC is a signatory of. The CoM is a European movement involving local and regional authorities, voluntarily committing to increasing energy efficiency and use of renewable energy sources on their territories. By their commitment, Covenant signatories aim to meet and exceed the European Union 20% carbon dioxide (CO2) reduction objective by 2020.</p> <p><a href="http://www.covenantofmayors.eu/index_en.html">http://www.covenantofmayors.eu/index_en.html</a></p> <p>Powering Aberdeen also helps ensure compliance with Public Bodies Duties reporting as part of working towards attainment of the targets within the Climate Change Act 2009, aside from other topic specific statute.</p>
Subject	Emissions reduction, fuel security, waste, transport, energy, construction and planning.
Period Covered by the PPS	2015-2030
Frequency of Updates	<p>Powering Aberdeen is a flexible document which should be reviewed continuously.</p> <p>The CoM requires reporting every 2 years – including enhanced SEAP development and submission of a Monitoring Energy and Emissions Inventory (MEEI) which reports progress against the Baseline Energy and Emissions Inventory (BEEI). Annual reporting will be undertaken as part of Powering Aberdeen governance. Interim progress could be reported as part of our Public Bodies Duties reporting, the Carbon Reduction Commitment (CRC) and performance indicators which are undertaken on an annual basis, aside from any other avenues identified within the delivery model and offered by partner organisations</p>
Area covered by the PPS	Aberdeen City
Purpose and/or objectives of the PPS	Powering Aberdeen covers many subjects including emissions reduction and renewable energy, focusing upon areas/sectors that contribute the most emissions presently.
Contact Point	<p>Terri Vogt  SEAP Programme Manager  Communities, Housing and Infrastructure  Planning and Sustainable Development  Aberdeen City Council  Business Hub 4  Ground Floor North  Marischal College  Aberdeen, AB10 1AB</p>

## **2. Strategic Environmental Assessment Process**

We have prepared and carried out environmental assessment for Powering Aberdeen: Aberdeen's Sustainable Energy Action Plan as required under the Environmental Assessment (Scotland) Act 2005. The process includes the following activities:

1. Considering the views of the Scottish Environment Protection Agency, Scottish Natural Heritage and Historic Environment Scotland during the screening process regarding aspects of Powering Aberdeen likely to have significant effects on the environment and whether full SEA was required;
2. Taking into account the views of the Scottish Environment Protection Agency, Scottish Natural Heritage and Historic Environment Scotland about the scope and level of detail that was appropriate for the environmental report;
3. Preparing an environmental report on the likely significant effects on the environment of Powering Aberdeen: Aberdeen's Sustainable Energy Action Plan including:-
  - The baseline data relating to the current state of the environment including the evolution of the environment without Powering Aberdeen as well as identification of areas likely to be significantly affected;
  - Links between the plan and other relevant policies, plans, programmes and environmental objectives;
  - Existing environmental problems affecting the plan;
  - The plan's likely significant effects on the environment (positive and negative);
  - The mitigation measures envisaged;
  - An outline of the reasons for selecting the alternatives chosen;
  - Monitoring measures to ensure that any unforeseen environmental effects will be identified allowing for appropriate remedial action to be taken.
4. Consulting on the environmental report;
5. Taking into account the environmental report and the results of consultation in making final decisions regarding Powering Aberdeen;
6. Committing to monitoring the significant environmental effects of the implementation of the Action Plan to identify any unforeseen adverse significant environmental effects and to taking appropriate remedial action.



### 3. Effects of the Environmental Considerations on the Action Plan

Table 3.1 summarises how environmental considerations have been integrated into Powering Aberdeen: Aberdeen's Sustainable Energy Action Plan. This includes the measures that were taken to offset adverse effects or enhance positive effects, details of how the cumulative and other indirect effects of the Action Plan have been considered and how these protective objectives were taken into account in Powering Aberdeen.

**Table 3.1: Environmental Considerations**

SEA Topic	Environmental Considerations	Integrated into the Plan?	How integrated/Taken into Account or Reason for not being Taken into Account
Air and Climatic factors	<ul style="list-style-type: none"> <li>The possibility of the release of particulate matter through construction of energy projects and the necessity of curtailing such releases.</li> <li>The possibility of generating air pollution associated with the implementation processes and the need to minimise air quality impacts of associated energy projects</li> <li>The relationship between increased burning of fossil fuel and climate change.</li> <li>This link between climate change and increased risk of flood events.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Powering Aberdeen applies air quality policy from the local development plan which ensures that proposed developments which are likely to have negative effects on air quality will not be permitted unless measures to mitigate the impact of air pollutants can be agreed.</li> <li>Powering Aberdeen recognises and adopts compensation sought for transport and road infrastructure improvements as part of the future local transport strategy's Sustainable Urban Mobility Plan. This will help mitigate any potential traffic impacts arising from vehicular movements arising from actions outlined in Powering Aberdeen.</li> <li>It also emphasizes a mix of renewable and energy efficiency measures to address climatic impacts.</li> </ul>
Water	<ul style="list-style-type: none"> <li>Potential for any energy installation facilities and ancillary structures to use water thereby necessitating the need for water abstraction or excessive use.</li> <li>The importance of maintaining and improving water quality and water environment resulting from run off. It also concerns potential release of pollutants into water bodies including the River Dee.</li> <li>Potential for the development phase of</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Powering Aberdeen adopts Aberdeen Local Development Plan (ALDP) policies requiring all new developments to install water-saving technologies.</li> <li>Powering Aberdeen seeks HRA for projects flowing from the Action Plan to address effects of water abstraction if they are likely to have significant effects on River Dee.</li> <li>Powering Aberdeen adopts ALDP policies concerning SUDs, water efficiency as well as drainage and flood management for every future energy projects. These policies include LDP Policy NE6 Flooding and Drainage, Supplementary Guidance on Flooding and Drainage; Coastal Planning; Sustainable Urban Drainage;</li> </ul>

	<p>projects to pollute water bodies and have adverse effects on the water environment and the coast generally.</p> <ul style="list-style-type: none"> <li>• Potential for excavations for developments to exacerbate short to medium term localised flooding.</li> </ul>		Drainage Impact Assessment as well as Aberdeen Open Space Strategy.
Soil	<ul style="list-style-type: none"> <li>• The need to avoid contamination of land through development and to support developments that promote remediation of existing contaminated land.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>• Powering Aberdeen requires all energy projects affecting potential contaminated land to be subject to a site investigation and remediation as appropriate. Besides Powering Aberdeen will enforce LDP policy regarding restoration, reclamation or remediation of degraded or contaminated land,</li> </ul>
Biodiversity Flora and Fauna	<ul style="list-style-type: none"> <li>• The necessity of supporting, promoting and protecting biodiversity of flora and fauna, land and marine environments.</li> <li>• The need to avoid development within the catchment of sensitive sites, and where impacts are anticipated to secure appropriate mitigation and compensatory measures.</li> <li>• The recognition that insulation in places like Froghall, and overcladding at Seaton as well as retrofitting programmes may have the potential to impact on bats which (depending on species) seasonally roost in roof space, lofts and other building cavities. Similar effects are likely to affect protected species like swifts which nest in building cavities.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>• Powering Aberdeen seeks to minimise environmental impacts through avoidance or mitigation. Where impacts are anticipated these are to secure compensatory measures to offset any adverse impact.</li> <li>• It provides a framework for protection and enhancement of the surrounding land and local habitats. It applies green space network policy to developments flowing from it.</li> <li>• It places project level Habitats Regulations Assessment at its forefront.</li> <li>• It seeks early planning and survey for these species to be undertaken. It requires bat surveys to be undertaken at appropriate times of year and planned in advance to avoid breaches in legislation and expensive project delays.</li> </ul>
Cultural Heritage	<ul style="list-style-type: none"> <li>• The need to protect and, where appropriate, enhance or restore the historic environment.</li> <li>• The necessity of improving the enjoyment and understanding of the historic</li> </ul>	Yes	<ul style="list-style-type: none"> <li>• The Action plan maintains the LDP protective policies on the historic environment.</li> <li>• The Action plan seeks to protect and enhance existing heritage sites, and places of local importance.</li> <li>• Powering Aberdeen is a collaborative process which will engage</li> </ul>



	<p>environment</p> <ul style="list-style-type: none"> <li>• The need to recognise that developments could have adverse effects on historical features including landscape and their setting.</li> <li>• The potential for energy efficiency actions to have negative effects on the historic environment. For example, energy efficient improvements can be inappropriate for historic or traditional buildings (in particular, undesignated buildings, where alterations would not be subject to listed building consent).</li> </ul>		<p>with all stakeholders including internal officers and Historic Environment Scotland before any improvement is made to any built heritage.</p> <ul style="list-style-type: none"> <li>• It requires prior consent before developments proceed.</li> <li>• Consistent with the LDP policy, it requires energy development actions to enhance the setting of heritage assets.</li> <li>• It requires the application of Architecture and Placemaking policy in the LDP to all proposals so that all new projects will have due consideration for its setting.</li> </ul>
• Landscape	<ul style="list-style-type: none"> <li>• Recognition that developments can have negative effects on and changes to the landscape character, features, their context, patterns of past use, and how they are valued and enjoyed by many people. This is because of their siting, size, and operation conditions,</li> <li>• Potential for energy projects to have visual impacts on the landscape particularly from over-cladding of the high rise buildings in areas such as Seaton</li> <li>• Potential effect of future projects on the landscape and cityscape setting of the city.</li> <li>•</li> </ul>	• Yes	<ul style="list-style-type: none"> <li>• Powering Aberdeen gives regard to landscape and visual impact.</li> <li>• The environmental report of the action plan requires mitigation of landscape impacts through screening of sensitive sites within the landscape where appropriate and adoption a mitigation hierarchy (i.e. prevent, reduce or offset).</li> <li>• The environmental report accompanying the action plan suggests that any proposed development likely to have unacceptable visual intrusion should not be allocated.</li> <li>• Partners seeking to develop a project would be required to obtain landscape advice from the Environment Team before the project goes ahead</li> <li>• The report requires energy projects to improve the visual amenity and landscape character of areas consistent with the LDP policy.</li> <li>• It requires the application of a mitigation hierarchy to deal with future projects.</li> </ul>
Material Assets	<ul style="list-style-type: none"> <li>• The potential for significant positive effects arising from implementation of projects.</li> <li>• The need to protect and enhance existing material assets and to be aware that development will put pressure on</li> </ul>	Yes	<ul style="list-style-type: none"> <li>• The action plan promotes reuse of resources, the use of existing LDP allocations,</li> <li>• It promotes sustainable use of waste and access to the natural and built environment</li> <li>• It also considers enhancing material asset by providing reuse and recycling facilities.</li> </ul>

	<p>existing infrastructure but also create opportunities for acquisition of assets and improvement of existing access routes/infrastructure.</p> <ul style="list-style-type: none"> <li>• The potential for energy projects to utilise employment land allocation and community facilities to meet the needs of people in Aberdeen City</li> <li>• The potential to allow for the sustainable use of resources including waste and energy</li> <li>• The potential to promote the provision of safe pedestrian access links and access to natural and built assets</li> </ul>		
<ul style="list-style-type: none"> <li>• Population and Health</li> </ul>	<ul style="list-style-type: none"> <li>• The opportunity of energy projects to alleviate fuel poverty and improve energy efficiency which is likely to have positive effects on the people and diverse population of Aberdeen.</li> <li>• The potential for energy projects to promote economic growth, social inclusion, environmental improvement, health and safety. This can be achieved through a range of employment and tourism opportunities generated through new energy projects.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>• It identifies a wide range of actions and actors including municipal, tertiary, public and local buildings, equipment and facilities.</li> <li>• It also identifies the role of residential buildings, public lighting, industry, transport, electricity, heating and renewables as a range of energy sources to meet the needs of diverse population in the city in efficient ways.</li> <li>• It doing so, it will seek to enhance positive effects of the actions, building on positive effects in other complementing plans like the LDP, LTS, Open Space Strategy and Nature Conservation Strategy</li> </ul>

#### 4. Effects of the Environmental Report on Powering Aberdeen

Table 4.1 summarises how the Environmental Report has been taken into account within Powering Aberdeen: Aberdeen's Sustainable Energy Action Plan in accordance with Section 18 (3) (a-b) of the Environmental Assessment (Scotland) Act 2005. This table describes how the Environmental Report has been taken into account in the Development Framework and what specific changes were made, particularly where significant negative and cumulative effects were identified. It also highlights when the mitigation is to be considered if there is the need for a more detailed assessment at a later stage in the planning process.

**Table 4.1: Environmental Report**

SEA Topic	Findings from Environmental Report	Integrated into the Plan?	How integrated/Taken into Account or Reason for not being Taken into Account	When should mitigation be considered?
Air and Climatic factors	<p>We found that the effects of Powering Aberdeen on the environment are mixed - significantly positive and negative for air and significantly positive for climatic factors.</p> <p>In the longer term, improvement of sustainable transport facilities, reduction in single car occupancy, general energy efficiency programme, sustainable waste management, high efficiency standards in construction are likely to lead to future improvement in air quality through time lag. Depending on the timing of individual project developments, there is the possibility that dust nuisance will be generated, with potential cross-boundary effects. Synergistic effects of individual project developments on air quality are unlikely. Although NO<sub>x</sub> continue to exceed national objectives, these are limited to AQMA in Aberdeen City. Again it is not considered that there will be a significant and indirect air pollution issues for Aberdeen City arising from the deposition of air pollutants on other receptors.</p>	Yes	<p>The Framework should encourage the use of renewable energy sources and energy efficiency measures in buildings.</p> <p>The implementation of the strategy should minimise car dependence, air pollution and nuisance.</p> <p><b>Mitigation measures</b></p> <ul style="list-style-type: none"> <li>Powering Aberdeen applies air quality policy from the local development plan which ensures that proposed developments which are likely to have negative effects on air quality will not be permitted unless measures to mitigate the impact of air pollutants can be agreed.</li> <li>Powering Aberdeen recognises and adopts compensation sought for transport and road infrastructure improvements as part of the future local transport strategy's Sustainable Urban Mobility Plan. This will help mitigate any potential traffic impacts arising from vehicular movements arising</li> </ul>	When projects are being implemented by partners

	<p>Cumulatively Powering Aberdeen will reduce emissions and limit climate change and its effects such as flooding through a time-lag effect. There would be a comparatively small amount of direct emissions released for developments. This would be compensated with the overall long term emissions reduction. Having a low emission society would be very positive for reducing the effects of climate change, both cross boundary and incrementally. Installation of low emission infrastructure would produce short term emissions but this would be outweighed by the long term emission reduction.</p>		<p>from actions outlined in Powering Aberdeen.</p> <ul style="list-style-type: none"> <li>It also emphasizes a mix of renewable and energy efficiency measures to address climatic impacts.</li> </ul>	
Water	<p>The effects of SEAP on the environment are mixed (+/-) but not significant. The overall objectives of Powering Aberdeen will improve water quality and promote efficient use of water. The various projects could have minor effects in terms of water pollution on the general water environment.</p>	Yes	<p>Powering Aberdeen seeks to minimise water pollution and avoid disturbance to qualifying features of the River Dee.</p> <p>The implementation of the actions plan aims to avoid the risk of flooding</p> <p>Powering Aberdeen seeks to be neutral on water quantity and quality.</p> <p><b>Mitigation measures</b></p> <ul style="list-style-type: none"> <li>Powering Aberdeen adopts Aberdeen Local Development Plan (ALDP) policies requiring all new developments to install water-saving technologies.</li> <li>Powering Aberdeen seeks HRA for projects flowing from the Action Plan to address effects of water abstraction if they are likely to have significant effects on River Dee.</li> <li>Powering Aberdeen adopts ALDP policies concerning SUDs, water efficiency as well as drainage and flood management for every future energy projects. These policies include LDP Policy NE6 Flooding and</li> </ul>	<p>When projects are being implemented by partners</p>

			Drainage, Supplementary Guidance on Flooding and Drainage; Coastal Planning; Sustainable Urban Drainage; Drainage Impact Assessment as well as Aberdeen Open Space Strategy.	
Soil	<p>Overall assessment is positive (+). It is observed that individual energy projects could lead to soil compaction, loss, sealing and erosion; but these are thought to be over a short-term period only. Overall Powering Aberdeen would lead to long-term cumulative positive effects on soil by protecting it from the effects of climate change such as through flooding and surface water run-off.</p> <p>There is a potential for a spread of Invasive Non-Native Species (INNS) during construction or when disposing of surplus soil.</p>	Yes	<p>Mitigation measures are provided on precautionary basis only</p> <p><b>Mitigation measures</b></p> <ul style="list-style-type: none"> <li>• Powering Aberdeen requires all energy projects affecting potential contaminated land to be subject to a site investigation and remediation as appropriate.</li> <li>• Besides Powering Aberdeen will enforce LDP policy regarding restoration, reclamation or remediation of degraded or contaminated land,</li> <li>• Stakeholders undertaking construction projects under Powering Aberdeen should identify the potential for the spread of INNS and carefully remove and treat them.</li> </ul>	When projects are being implemented by partners
Biodiversity Flora and Fauna	<p>Overall assessment is positive (+). Cumulatively and over a long term time frame Powering Aberdeen would protect biodiversity and habitats from the effects of climate change by improving greenspace, managing resources responsibly, and increasing habitats by planting trees. In order to fulfil Powering Aberdeen's vision some projects may directly affect habitats and species in Aberdeen through their loss, fragmentation or disturbance. The effects identified are not likely to have significant effects.</p>	Yes	<p>Mitigation measures are provided on precautionary basis only</p> <p><b>Mitigation measures</b></p> <ul style="list-style-type: none"> <li>• Powering Aberdeen seeks to minimise environmental impacts through avoidance or mitigation. Where impacts are anticipated these are to secure compensatory measures to offset any adverse impact.</li> <li>• It provides a framework for protection and enhancement of the surrounding land and local habitats. It applies green space</li> </ul>	When projects are being implemented by partners

			<p>network policy to developments flowing from it.</p> <ul style="list-style-type: none"> <li>• It places project level Habitats Regulations Assessment at its forefront.</li> <li>• It seeks early planning and survey for these species to be undertaken. It requires bat surveys to be undertaken at appropriate times of year and planned in advance to avoid breaches in legislation and expensive project delays.</li> </ul>	
Cultural Heritage	<p>Overall assessment is neutral to negative (0/-) although the effects are not thought to be significant. Essentially, some of Powering Aberdeen's individual projects could have a direct or long term effects on the landscape setting of historic buildings, archaeological sites and conservation sites. However, the majority of Powering Aberdeen's objectives are unlikely to have any significant impact on cultural heritage.</p>	Yes	<p>Mitigation measures are provided on precautionary basis only</p> <p><b>Mitigation measures</b></p> <ul style="list-style-type: none"> <li>• The Action plan maintains the LDP protective policies on the historic environment.</li> <li>• The Action plan seeks to protect and enhance existing heritage sites, and places of local importance.</li> <li>• Powering Aberdeen is a collaborative process which will engage with all stakeholders including internal officers and Historic Environment Scotland before any improvement is made to any built heritage.</li> <li>• It requires prior consent before developments proceed.</li> <li>• Consistent with the LDP policy, it requires energy development actions to enhance the setting of heritage assets.</li> <li>• It requires the application of Architecture and Placemaking policy in the LDP to all proposals so that all new projects will have due consideration for its setting</li> </ul>	When projects are being implemented by partners

Landscape	Overall assessment is neutral to negative (0/-) although the effects are not thought to be significant. Some of Powering Aberdeen's individual projects could have a direct and long term effect on the landscape setting of Aberdeen with potential cross boundary effects. However, the majority of Powering Aberdeen's objectives are unlikely to have any significant impact on cultural heritage.	Yes	<p>Mitigation measures are provided on precautionary basis only</p> <p><b>Mitigation measures</b></p> <ul style="list-style-type: none"> <li>• Powering Aberdeen gives regard to landscape and visual impact.</li> <li>• The environmental report of the action plan requires mitigation of landscape impacts through screening of sensitive sites within the landscape where appropriate and adoption a mitigation hierarchy.</li> <li>• The environmental report accompanying the action plan suggests that any proposed development likely to have unacceptable visual intrusion should not be allocated.</li> <li>• Partners seeking to develop a project would be required to obtain landscape advice from the Environment Team before the project goes ahead</li> <li>• The report requires energy projects to improve the visual amenity and landscape character of areas consistent with the LDP policy.</li> <li>• It requires the application of a mitigation hierarchy to deal with future projects.</li> </ul>	When projects are being implemented by partners
Material Assets	Overall assessment is positive (+). The promotion of an increased share of alternative technologies is likely to provide the scope for creation of long term fixed assets. The use of natural and material assets, promoting waste minimisation, recycling and composting is encouraged. In that sense it is not envisaged that there will be any adverse cumulative effects. Powering Aberdeen is likely to have significant positive effect overall.	Yes	<p>Mitigation measures are provided on precautionary basis only</p> <p><b>Mitigation measures</b></p> <ul style="list-style-type: none"> <li>• The action plan promotes reuse of resources, the use of existing LDP allocations,</li> <li>• It promotes sustainable use of waste and access to the natural and built</li> </ul>	When projects are being implemented by partners

			<p>environment</p> <ul style="list-style-type: none"> <li>It also considers enhancing material asset by providing reuse and recycling facilities.</li> </ul>	
Population and Health	<p>Overall assessment is positive (+). The promotion of an increased share of alternative technologies is likely to provide the scope for increasing long term employment through job creation and market diversification. The use of natural and material assets, promoting waste minimisation, recycling and composting is encouraged. In that sense it is not envisaged that there will be any adverse cumulative effects. Powering Aberdeen is likely to have positive effects overall. Powering Aberdeen's joined up thinking and impetus to improve global climatic conditions will have a positive impact on human health through a long term improvement in air quality, improved weather conditions. Besides, Powering Aberdeen's overall aim to reduce emissions and generate energy more sustainably would protect biodiversity, habitats and greenspaces from the effects of climate change by managing resources responsibly. Moreover, by increasing habitats through planting trees, and creation of more usable open/green spaces will enable people to carry out healthy sporting activities. There is an overall significant positive effect from emissions reduction.</p>	Yes	<p>Mitigation measures are provided on precautionary basis only</p> <p><b>Mitigation measures</b></p> <ul style="list-style-type: none"> <li>It identifies a wide range of actions and actors including municipal, tertiary, public and local buildings, equipment and facilities.</li> <li>It also identifies the role of residential buildings, public lighting, industry, transport, electricity, heating and renewables as a range of energy sources to meet the needs of diverse population in the city in efficient ways.</li> <li>It doing so, it will seek to enhance positive effects of the actions, building on positive effects in other complementing plans like the LDP, LTS, Open Space Strategy and Nature Conservation Strategy</li> </ul>	When projects are being implemented by partners



## 5. Taking Consultation Opinions into Account

As required by Section 18 (3) (c) and (d) of the Environmental Assessment (Scotland) Act 2005, the opinion expressed during the consultation were given due consideration. Table 5.1 summarises how opinions expressed during the consultation have been taken into account.

**Table 5.1: Analysis of Comments**

Body/Person making comment	Comment	Response	Resulting change
Scottish Environmental Protection Agency (SEPA)	It is helpful to see how the outcomes of the scoping exercise have been taken on board.	Noted	None
Scottish Environmental Protection Agency (SEPA)	We consider that the Environmental Report adequately and accurately addresses our interests in terms of the alternatives assessed, impacts identified and mitigation and monitoring proposed	Noted	None
Scottish Environmental Protection Agency (SEPA)	We note that Powering Aberdeen is both a high level strategic document with overall targets as well as detailed project proposals and this provides difficulties in preparing the Environmental Report but we consider that these have been well managed	Noted	None
Scottish Environmental Protection Agency (SEPA)	We also note that some site specific proposals relevant to our interests, including those relating to waste, have already been subject to SEA. However this has also been addressed in this Environmental Report.	Noted	None
Scottish Environmental Protection Agency (SEPA)	We note that information on the state of the environment in Aberdeen is constantly updating, including in particular in relation to flood risk (and the event in December 2015). However, we do not consider that this impacts on the assessments in the Environmental Report at this time.	Noted	None
Scottish Environmental Protection Agency (SEPA)	Updated information can be provided if requested and the Flood Risk Management Plans are shortly to be published.	Noted	None
Scottish Environmental Protection Agency	As the Powering Aberdeen: Aberdeen's Sustainable Energy Action Plan (SEAP) is finalised, Aberdeen City Council as Responsible Authority, will be required to take account of the findings of the Environmental Report and	Noted	We will take the necessary action See SEA Statement

Body/Person making comment	Comment	Response	Resulting change
(SEPA)	of views expressed upon it during this consultation period. As soon as reasonably practical after the adoption of the plan, the Responsible Authority should publish a statement setting out how this has occurred. We normally expect this to be in the form of an "SEA Statement" similar to that advocated in the <u>Scottish Government SEA Guidance</u> . A copy of the SEA statement should be sent to the Consultation Authorities via the Scottish Government SEA Gateway on publication.		Attached
Historic Environment Scotland	<b>Part 1: Content of Plan</b> We have no comments to offer on the content of the Plan itself.	Noted	None
Historic Environment Scotland	<b>Part 2: Environmental Report</b> I found that the ER sets out clearly the scope and findings of this assessment, and I am broadly content that the assessment findings are appropriate in relation to potential effects on the historic environment, subject to the following detailed comments:	Noted	None
Historic Environment Scotland	<i>6.1 Framework for assessing environmental effects</i> – it would have been helpful if, at the beginning of this section, you had included a key to the scoring symbology, to clarify the distinction between significant and non significant effects.	Text in Section 6.1 has now included key on symbols used.	See Section 6.1
Historic Environment Scotland	For information, the scoring and commentary in relation to cultural heritage findings are inconsistent related to cultural heritage on pages 63 and 89. However, we are satisfied that in neither case, significant effects are unlikely. You could also have considered the potential for the energy efficiency theme to cause negative effects by encouraging energy efficiency improvements which are inappropriate for historic or traditional buildings (in particular, undesignated buildings, where alterations would not be subject to listed building consent.)	Option 3 and Energy Efficiency Objective has been reassessed to bring consistency in the assessments.	See Table 6.3 and Table 6.7
Historic Environment Scotland	<i>Monitoring:</i> I am content with the proposed monitoring indicators for cultural heritage. However, you have proposed that the monitoring data will be supplied by HES, however, your authority's development management/building standards team is more likely to be the appropriate source of data for these indicators.	Noted	Amended

Body/Person making comment	Comment	Response	Resulting change
Scottish Natural Heritage (SNH)	There appear to be some errors in Table numbering. For example, there is a Table 6.4 on page 65 and a different Table 6.4 on page 109. On page 118, the comment against Soil, appears to have been cut and pasted against water on page 119. You will need to read through the report and ensure all these minor errors have been corrected in the final version.	Table numbers changed and errors corrected,	See Table 6.11 and Table 6.12
Scottish Natural Heritage (SNH)	Page 35 – Table 5.1 – the heading between lines 41 and 42 should read Nature Conservation.	Amended	See Table 5.1
Scottish Natural Heritage (SNH)	Page 38 – Table 5.2 – I think some of the possible changes you identify to biodiversity without Powering Aberdeen are too extreme. Even without Powering Aberdeen, Local and Strategic Development Plan policies, the Council's own Biodiversity Duty and other plans and strategies should prevent things like habitat fragmentation or the loss of greenspace. I think it more likely that without Powering Aberdeen, opportunities would be lost to develop and demonstrate better practice in how projects delivering the more sustainable use of energy can also contribute to wider benefits, such as biodiversity, greener and more active travel etc.	Amended	See Table 5.2
Scottish Natural Heritage (SNH)	Page 40 – Table 5.3 – I would suggest that rather than having as the implications - <i>Protect biodiversity through minimising the impact on protected and non - protected designations</i> – you put - <i>Powering Aberdeen will promote the well-established principles of good practice, good design and good planning which can avoid these problems arising in the construction and operation of developments</i> . This should also be included in the Repowering Aberdeen Strategy itself.	Noted	See Table 5.2
Scottish Natural Heritage (SNH)	Page 40 – Table 5.3 – Invasive Non-Native Species (INNS), especially plants like Japanese Knotweed, Giant Hogweed and Himalayan Balsam, are growing problems where soil is moved or disposed from development sites, not least because of the impact they have on biodiversity. You may wish to add an environmental problem against soil of: <i>Spreading Invasive Non-Native Species (INNS) during construction or when disposing of surplus soil</i> .	Problem added	See Table 5.3
Scottish Natural Heritage (SNH)	Page 40 – table 5.3 – Against Water, the key to minimising impacts on the River Dee SAC (and indeed most environmental impacts) is good, early	Problem added	See Table 5.3

Body/Person making comment	Comment	Response	Resulting change
	planning with environmental advice taken at that early stage rather than once the design/plan for the development is almost completed. It might be worth considering the addition of a sentence in Table 4.2 (Aims), possibly, against the policy change and integration objective along the following lines: <i>The promotion of good planning and design of individual projects at the earliest stages will ensure reduced environmental impacts and minimised delays/costs often associated with the late consideration in project development of environmental impacts.</i> This should also be included in the Repowering Aberdeen Strategy itself.		
Scottish Natural Heritage (SNH)	Page 44 – Table 6.1 – Biodiversity. Again, I think it is worth emphasising (as in point 3 above) that Powering Aberdeen will be a means of promoting best practice in designing, constructing and operating projects which will substantially reduce the risk of negative impacts by addressing them early in the project planning process.	Problem added	See Table 5.3
Scottish Natural Heritage (SNH)	Page 46 – Table 6.1 – Soil. Same comments as in point 4 above.	Problem added	See Table 5.3
Scottish Natural Heritage (SNH)	Page 58 – Table 6.3 – Biodiversity. Once again I think it is worth emphasising (as in points 3 & 6 above) that Powering Aberdeen will be a means of promoting best practice in designing, constructing and operating projects. Such an approach to developing projects will substantially reduce the risk of negative impacts by addressing them early in the project planning process. It is always cheaper and easier to avoid a problem in the first place, rather than trying to sort it out once the project is well underway or even completed. This should also be included in the Repowering Aberdeen Strategy itself.	Added	See Table 6.3
Scottish Natural Heritage (SNH)	Page 65 – Table 6.4. – Biodiversity. See points 3, 6 & 8. And the same point applies to tables 6.5, 6.6, 6.7, 6.8, 6.9 and 6.10 in relation to biodiversity.	Added	See Tables 6.5-6.10
Scottish Natural Heritage (SNH)	Page 109 – Table 6.4. There is already a Table 6.4 on page 65. This affects the numbering of subsequent tables.	Numbering amended	See Table 6.11 and Table 6.12

Body/Person making comment	Comment	Response	Resulting change
Scottish Natural Heritage (SNH)	Page 116 – Table 6.5. Depending on the details of the procedures and techniques involved - insulation in Froghall, overcladding at Seaton and the National Retrofit Programme may have the potential to impact on bats which (depending on species) will seasonally roost in roof space, lofts and other building cavities. All bats are European Protected Species and suitably qualified survey of these buildings may be necessary. Bat surveys can only be carried out at certain times of year and will need to be considered and planned in advance to avoid breaches in legislation and expensive project delays. More detailed advice can be found on the SNH website <a href="http://www.snh.gov.uk/protecting-scotlands-nature/species-licensing/mammal-licensing/bats-and-licensing/">http://www.snh.gov.uk/protecting-scotlands-nature/species-licensing/mammal-licensing/bats-and-licensing/</a> Other protected species like swifts can also nest in building cavities. I would recommend that you seek advice on this general topic from your Council's own Environment Team.	Report amended to reflect the comments	See Table 6.12, Table 7.1 and Table 8.1
Scottish Natural Heritage (SNH)	Page 119/120. Again it depends on the detail of the proposals, but the overcladding of the high rise buildings in Seaton could potentially have visual impacts. Your Council's own landscape advisor could advise you on this.	Report amended to reflect the comments	See Table 6.12, Table 7.1 and Table 8.1
Scottish Natural Heritage (SNH)	Page 122 – Table 6.6. While land take, especially of semi-natural habitats and green/open space, is a potential risk to biodiversity, other factors such as modifications to buildings that bats, birds or other fauna may utilise for nesting and roosting also needs to be considered. The likelihood of effects or risks will depend on the detail of the project. Again, I would recommend you seek the advice of the Council's own Environment Team.	Report amended to reflect the comments	See Table 6.13, Table 7.1 and Table 8.1
Scottish Natural Heritage (SNH)	Page 135 – Table 7.1 – Biodiversity. Under the “Plan Impact” column. You should add a bullet point stating that protected species, especially European Protected Species such as bats and some birds will use spaces in and on some buildings. Under mitigation measures, you could add that early planning and survey for these may be necessary.	Report amended to reflect the comments	See Table 7.1 and Table 8.1

Body/Person making comment	Comment	Response	Resulting change
Scottish Natural Heritage (SNH)	Page 136 – Table 7.1 – Soil. You may want to mention the risks and mitigation required for INNS – see my point 4 above.	Report amended to reflect the comments	See Table 7.1 and Table 8.1
Scottish Natural Heritage (SNH)	Page 140 – 8.1 – Monitoring Plan. I think it is worth including in the introductory paragraph a statement to the effect that as best practice in the design and planning of projects will be promoted by the Council; the likelihood of remedial action being required should be much reduced. It may be that if remedial action is required, the changes may include the way in which further/future projects are assessed and approved. This should also be included in the Repowering Aberdeen Strategy itself.	Report amended to reflect the comments	See Table 8.1
Scottish Natural Heritage (SNH)	Page 141 – habitat fragmentation. The Council's own Environment Team should be the first source of advice on what remedial actions could be taken.	Report amended to reflect the comments	See Table 8.1
Scottish Natural Heritage (SNH)	Page 142 – Water. Advice on pollution would come from SEPA.	Report amended to reflect the comments	See Table 8.1
Scottish Natural Heritage (SNH)	Page 154 – Appendix 9.1 Nature Conservation. Insert the Wildlife and Natural Environment (Scotland) Act 2011 between lines 43 and 44. <a href="http://www.legislation.gov.uk/asp/2011/6/contents/enacted">http://www.legislation.gov.uk/asp/2011/6/contents/enacted</a> This updates the 2004 Act and mentions things like the reporting responsibility Local Authorities have to report progress against their biodiversity duty.	Report amended to reflect the comments	See Table 5.1 and Appendix 9.1 and Table

## 6. Reasons for Adopting Powering Aberdeen: Aberdeen's SEAP

Consistent with Section 18(3)(e), this Action Plan considered the following reasonable options under Section 4.1 of the Environmental Report:

Option	Description of Option
Option 1 – Do Nothing	The City stakeholders do nothing but carry on business as usual.
Option 2 – Do minimum	The City stakeholders implement their individual plans and strategies to drive emission reduction and alternative forms of energy which do not go far enough in reducing emissions.
Option 3 – Do optimum (Preferred)	The City stakeholders work in partnership across all sectors to develop an action plan that tackles emissions and energy issues across the whole city.

Option 3 is adopted in the light of the other two alternatives discussed for the following reasons:

- The results of the environmental assessment indicate that not only does the preferred option have the least adverse effect on the environment; it is also likely to have significant positive effects on the environment compared with the other two options.
- The preferred option is consistent with other relevant international, national, regional and local plans and programmes as well as environmental protective objectives listed in Section 5.1 of the environmental report
- Powering Aberdeen: Aberdeen's Sustainable Energy Action Plan outlines a vision for the sustainable energy action while will go a long way to alleviate the potential negative indirect impacts of climate change.
- Powering Aberdeen considers how to maximise the opportunities presented by collaborative development of sustainable energy action plan to promote environmental improvements.
- It also allows for amendment to be made to the action plan by promoting best practice in the planning, design and implementation of projects so that the likelihood of remedial action being required is much reduced.
- Where there are negative effects, they are more likely to be minimised and mitigated as a result of Powering Aberdeen. Besides the identification of future monitoring plan ensures that the city becomes a more sustainable place to live and work in.

## 7. Monitoring Measures

Aberdeen City Council is required under to Section 18(3)(f) of the Environmental Assessment (Scotland) Act 2005 to monitor the significant environmental effects when the plan is implemented.

A monitoring report in Table 7.1 below will form the basis of constant monitoring of significant effects.





**Table 7.1: Monitoring Plan**

<b>Effects</b>	<b>What sort of information is required? (Indicators)</b>	<b>Where will information be obtained from?</b>	<b>Are there gaps in the existing information and how can it be resolved?</b>	<b>When should the remedial action be considered?</b>	<b>Who is responsible for undertaking the monitoring?</b>	<b>How should the results be presented?</b>	<b>What remedial actions could be taken?</b>
<b>Biodiversity</b>	Impact on the qualifying features of the River Dee SAC	Dee catchment management plan		When Powering Aberdeen is being developed and when the projects are well defined in terms of how, what, where and when. Remedial action to be considered if water quality is likely to deteriorate or as a resource is likely to be under pressure.	Aberdeen City Council Environment Team, SNH, SEPA, Dee Catchment Partnership, North East Scotland Biodiversity Partnership	As and when necessary	A review of the project proposed under Powering Aberdeen.
	Disturbance to dolphins and grey seals	HRA, SNH and JNCC		If SNH draws the authorities attention to it.	Powering Aberdeen governance, Aberdeen City Council and SNH	As and when necessary	A review of the project proposed under Powering Aberdeen, with advice from relevant parties.
	Disturbance of bats and swifts during insulation and over-cladding	SNH website <a href="http://www.snh.gov.uk/protecting-scotlands-nature/species-licensing/mammal-licensing/bats-and-licensing">http://www.snh.gov.uk/protecting-scotlands-nature/species-licensing/mammal-licensing/bats-and-licensing</a>	Until surveys are done	Before insulation and over-cladding commences	Stakeholders	In SEAP reviews	A review of insulation and over-cladding activities with advice from Environment Team and SNH

<b>Effects</b>	<b>What sort of information is required? (Indicators)</b>	<b>Where will information be obtained from?</b>	<b>Are there gaps in the existing information and how can it be resolved?</b>	<b>When should the remedial action be considered?</b>	<b>Who is responsible for undertaking the monitoring?</b>	<b>How should the results be presented?</b>	<b>What remedial actions could be taken?</b>
	Water abstraction	Scottish Water		When abstraction rate approaches licensed capacity by the time the projects under Powering Aberdeen are to be delivered.	Scottish Water	As and when necessary	A review of the project proposed under Powering Aberdeen with advice from Scottish Water and SEPA.
	Habitat fragmentation	Open Space Strategy, Nature Conservation Strategy, LBAP, and Greenspace Network reviews		When the Local Nature Conservation Strategy implementation team suggests that negative impact on habitats and species are likely if the proposed projects under Powering Aberdeen go ahead.	Powering Aberdeen governance, Aberdeen City Council Environment Team,	Open Space Strategy Annual Monitoring	A review of the project proposed under Powering Aberdeen with advice from Environment Team
<b>Air</b>	Nitrogen dioxide emissions  Air quality (PM10)	Aberdeen City Council Local Air Quality Management: Progress Reports. Low Emissions Strategy. Local Transport Strategy.	Yes. Project detail and implementation.	When projects under Powering Aberdeen are being implemented and when Air Quality monitoring in the City shows a worsening picture for PM10 and Nitrogen Dioxide.	Powering Aberdeen governance working with Environmental Health	As part of the Air Quality Action Plan or As and when is necessary	A review of the project proposed under Powering Aberdeen with advice from Environmental Health.

<b>Effects</b>	<b>What sort of information is required? (Indicators)</b>	<b>Where will information be obtained from?</b>	<b>Are there gaps in the existing information and how can it be resolved?</b>	<b>When should the remedial action be considered?</b>	<b>Who is responsible for undertaking the monitoring?</b>	<b>How should the results be presented?</b>	<b>What remedial actions could be taken?</b>
<b>Water</b>	<p>Impact on water quality of River Dee SAC Water abstraction</p> <p>Impact of development on water pollution</p> <p>Physical impact of development on water bodies and the coast</p>	<p>Dee catchment management plan</p> <p>SNH on the impact on the qualifying interests of the River Dee SAC</p>	<p>Yes. Project detail and implementation.</p>	<p>When projects under Powering Aberdeen are being implemented.</p> <p>When data from SEPA and SNH indicate potential pollution in the Dee.</p> <p>When data indicates that there has been an increase in flood incidents action should be taken.</p>	<p>Powering Aberdeen governance working with relevant and statutory agencies.</p>	<p>As and when necessary</p>	<p>A review of the project proposed under Powering Aberdeen with advice from SEPA.</p>
<b>Landscape</b>	<p>Impact of development on visually prominent areas</p> <p>Development adversely affecting the landscape and townscape character and setting.</p> <p>Visual impact from over-cladding</p>	<p>Landscape appraisal</p> <p>Public complaints</p> <p>Landscape Impact Assessment</p>	<p>Yes. Project detail and implementation.</p> <p>Until site is surveyed</p>	<p>When projects under Powering Aberdeen are being implemented and when landscape appraisal from developments in the City indicate a pressure on landscape and townscape setting.</p> <p>When there is a large amount of opposition to development.</p> <p>Before development takes place</p>	<p>Powering Aberdeen governance working with Development Management and developers.</p>	<p>As and when necessary</p>	<p>A review the project proposed under Powering Aberdeen with advice from planning.</p>

<b>Effects</b>	<b>What sort of information is required? (Indicators)</b>	<b>Where will information be obtained from?</b>	<b>Are there gaps in the existing information and how can it be resolved?</b>	<b>When should the remedial action be considered?</b>	<b>Who is responsible for undertaking the monitoring?</b>	<b>How should the results be presented?</b>	<b>What remedial actions could be taken?</b>
<b>Cultural Heritage</b>	Adverse effects on the historical features and their setting  Potential significant positive effects derived from reusing traditional buildings and adapting heritage assets	Historic Environmental Scotland	Yes. Project detail and implementation.	When projects under Powering Aberdeen are being implemented and when landscape appraisal from developments in the City indicate a pressure on landscape and townscape setting.  When there is a large amount of opposition to development.	Powering Aberdeen governance working with Development Management, developers, and Building Standards	As and when necessary	A review of the project proposed under Powering Aberdeen, with advice from Building Standards, Development Management and HES.
<b>Population &amp; Human health</b>	Enhancing positive effects	Powering Aberdeen Document, Local Transport Strategy, Local Housing Strategy, Local Development Plan	Yes. Project detail and implementation.	When projects under Powering Aberdeen are initiated and when it is being implemented and when development commences	Powering Aberdeen governance working with relevant stakeholders	As and when necessary	A review of the project proposed under Powering Aberdeen, with advice from relevant stakeholders.

<b>Effects</b>	<b>What sort of information is required? (Indicators)</b>	<b>Where will information be obtained from?</b>	<b>Are there gaps in the existing information and how can it be resolved?</b>	<b>When should the remedial action be considered?</b>	<b>Who is responsible for undertaking the monitoring?</b>	<b>How should the results be presented?</b>	<b>What remedial actions could be taken?</b>
<b>Material Assets</b>	Enhancing positive effects	Powering Aberdeen Document	Yes. Project detail and implementation.	When projects under Powering Aberdeen are being implemented and when development commences.	Powering Aberdeen governance working with Development Management and developers.	As and when necessary	A review of the project proposed under Powering Aberdeen, with advice from planning.
<b>Soil</b>	Potential spread of Invasive Non-Native Species (INNS) during construction or when disposing of surplus soil.	Site surveys	Yes, not yet considered in any document	When projects under Powering Aberdeen are being implemented and when development commences.	Powering Aberdeen governance working with Development Management and developers.	As and when necessary	A review of the project proposed under Powering Aberdeen, with advice from planning.

## **8. Conclusion**

It is our view that this SEA has had a positive effect on the development of Powering Aberdeen: Aberdeen's Sustainable Energy Action Plan. The SEA process has identified the key environmental issues, constraints and trends, as well as the likely significant effects on the environment. These are the effects that were not anticipated at the start of the planning process. The process has, therefore, enabled appropriate mitigation measures to be set against such effects, and incorporated into the Action Plan. With the incorporation of mitigation measures and alongside ongoing monitoring of the significant effects identified, it is considered that the proposals included in Powering Aberdeen: Aberdeen's Sustainable Energy Action Plan are in line with sound environmental principles. The mitigation measures incorporated in the assessment of the Action Plan identified measures that will prevent, reduce or offset any significant adverse effects on the environment when implementing the Action Plan. Overall the environmental assessment has helped to guide our preference for options on how we drive sustainable energy policies, plans, programmes, strategies and projects.