

Post-Adoption Statement

**SEA Post-Adoption Statement: PART 1**

To: SEA.gateway@gov.scot

Or

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**SEA Post-Adoption Statement: PART 2**

**An SEA Post-Adoption Statement is attached for:**


Sustainability and Climate Change Framework

**The Responsible Authority is:**

East Dunbartonshire Council

**SEA Post-Adoption Statement: PART 3**

**Contact Details**

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<b>Date</b>	24 <sup>th</sup> October 2018

# Sustainability and Climate Change Framework



sustainable thriving achieving

**East Dunbartonshire Council**

[www.eastdunbarton.gov.uk](http://www.eastdunbarton.gov.uk)

## SEA Post-Adoption Statement: PART 4

### Introduction

The Council has prepared a Sustainability and Climate Change Framework (SCCF) to identify the key issues for sustainability in terms of environmental protection and enhancement, quality of life and health, climate change, waste reduction, community empowerment and employment opportunities. The Framework, which sets out the context and recommendations, will be developed first. This will then set the scene and context in which the priorities and actions which will be established in partnership with key stakeholders to form a 'Dynamic Action Programme'. The Action Plan is likely to be updated more frequently than the Framework to respond to changes within the Council. The content of the Framework will be underpinned by a set of measures and actions in order to achieve the change. This will be determined by a range of approaches including an evidence-based approach; education and empowerment; monitoring and reporting; and sharing best practice. A series of initial building blocks have been identified which will centre focus for the Framework.

### Strategic Environmental Assessment

The SCCF has been subject to a process of Strategic Environmental Assessment (SEA), as required under the Environmental Assessment (Scotland) Act 2005. This has included:

- Taking into account the views of the Consultation Authorities regarding the scope and level of detail that was appropriate for the Environmental Report.
- Preparing an Environmental Report on the likely significant effects on the environment of the draft Plan which included consideration of:
  - The baseline data relating to the current state of the environment;
  - Links between the strategic action with other relevant policies, plans, programmes, strategies and environmental objectives;
  - Existing environmental problems affecting the strategic action;
  - The strategic action'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 ensue that any unforeseen environmental effects will be identified allowing for appropriate remedial action to be taken.
- Consulting on the Environmental Report.
- Taking into account the Environmental Report and the results of consultation in making final decisions regarding the strategic action.
- Committing to monitoring the significant environmental effects of the implementation of the plan to identify any unforeseen adverse significant environmental effects and to taking appropriate remedial action. The key findings are incorporated into the following sections.

### Post-Adoption Statement

The Post-Adoption Statement demonstrates how the findings of the SEA have been taken into account in the adopted Sustainability and Climate Change Framework (SCCF). In accordance with the Environmental Assessment (Scotland) Act 2005, the Post-Adoption Statement will demonstrate:

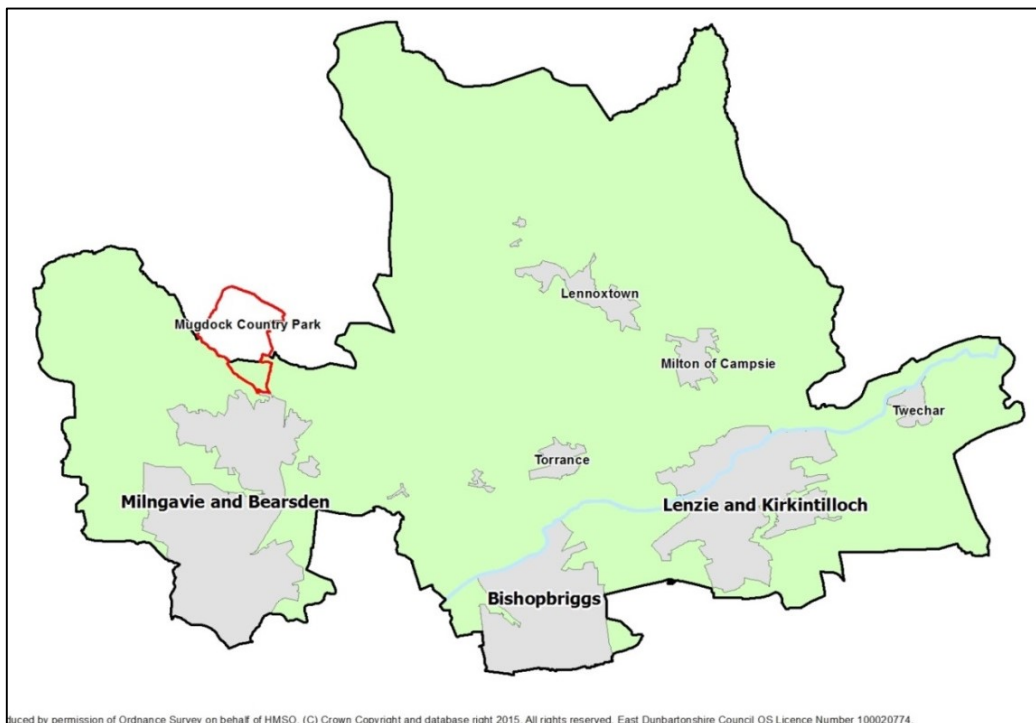
- The integration of environmental considerations into the SCCF;
- How the findings of the Environmental Report have been taken into account;
- How opinions expressed, from both the Community and Consultation Authorities, during the consultation of the Environmental Report have been taken into account;
- The reasons for choosing the SCCF as adopted in light of other reasonable alternatives; and,
- The measures to be taken to monitor the significant effects of the implementation of the SCCF.

## Post-Adoption Statement

<b>Section 1: Key Facts</b>	Section 1 details of the Sustainability and Climate Change Framework (SCCF) remit and the enabling legislation.
<b>Section 2: Environmental Considerations</b>	Section 2 details how environmental considerations have been integrated into the SCCF and notes how the environmental problems identified in the Scoping and Environmental Reports have been addressed.
<b>Section 3: Consideration of Alternatives</b>	Section 3 details the methods adopted to develop the SCCF.
<b>Section 4: Consultation</b>	Section 4 sets out the responses received from the Consultation Authorities and other interested parties, which are of relevance to the SEA Environmental Report. It states the actions taken as a result of the responses received from the Consultation Authorities.
<b>Section 5: Monitoring</b>	Section 5 details the monitoring required to ensure compliance with the SCCF.
<b>Section 6: Conclusion</b>	Section 6 summarises how the SEA process has informed the development of the SCCF.
<b>Appendix 1: Consultation Responses to the Draft Environmental Report</b>	Consultation responses received from SNH, SEPA and Historic Environment Scotland in response to the draft Environmental Report.

**Section 1: Key Facts Relating to the Sustainability and Climate Change Framework**

<b>Responsible Authority:</b>	East Dunbartonshire Council
<b>Title of PPS:</b>	Sustainability and Climate Change Framework (SCCF)
<b>What prompted the SCCF?</b>	Driven by a number of legal instruments, economic incentives, policy directions and public demands including: <ul style="list-style-type: none"><li>➤ Local Government in Scotland Act 2003</li><li>➤ Climate Change (Scotland) Act 2009</li><li>➤ Carbon Reduction Commitment Energy Efficiency Scheme 2010 – 2015</li><li>➤ Procurement Reform (Scotland) Act 2014</li></ul>
<b>Subject:</b>	Sustainable development and climate change
<b>Period covered:</b>	2016 - 2021
<b>Frequency of updates:</b>	The Framework will be updated every 5 years. The Dynamic Action Plan will be updated more frequently to respond to current issues.
<b>Area covered by the SCCF:</b>	The whole of East Dunbartonshire Council district



**Purpose of the SCCF:** The purpose of the Sustainability and Climate Change Framework is to facilitate change within East Dunbartonshire Council that goes beyond statutory duties to ensure that the Council is a leader in responding to the challenges of climate change and sustainable development. The Framework intends to focus primarily on environmental concerns due to strong social and economic agendas elsewhere in the Council. However, to fully achieve the Council’s sustainability ambition, coordination between environmental, social and economic factors will also be taken into consideration.

**SCCF Ambition and Key Objectives:** **Ambition:** By 2020, East Dunbartonshire Council will demonstrate sustainability by delivering services in a way that protects and enhances the local and global natural environment while meeting social and economic needs, especially where those needs are greatest. By recognising and fostering the natural links between environmental, social and economic agendas, the Council will demonstrate forward-thinking, creative and joined-up ways of working which show that being greener is compatible with, and can often enhance the achievement of corporate and community benefits.

**Key Objectives:**

**Zero Carbon: Reducing Carbon Emissions:** Use of fossil fuels releases carbon, forming a layer which traps heat and contributes to temperature rises with consequent changes in weather patterns, creating challenges for the survival and wellbeing of species. To mitigate climate change, carbon reduction will be pursued by applying the energy hierarchy, especially in relation to buildings and transport. Efficient use of water resources will also be encouraged within Council-owned operations and in the wider community, to save carbon. Reduction of landfill and protection of the natural environment will also be recognised for their role in reducing carbon emissions.

**Maximising Resilience to the Impacts of Climate Change:** The delayed effect of carbon emissions on the climate means that, even if we reduce future emissions, changes in weather patterns are expected to increase due to carbon that has been released in the past, creating a need to adapt to inevitable climate change. Work will be undertaken to better understand the likely impacts, on service providers and users and on the wider community, arising from changes in weather patterns, and action will be taken to reduce risk and increase resilience to the anticipated future effects of climate change. Prioritisation of action will be based on contexts where service users are most vulnerable, and contexts where there is a direct link to existing organisational priorities, including biodiversity action planning, health promotion and flood risk management.

**Zero Waste: Reducing Material use and Waste Generation:** The environment is adversely affected when materials are extracted and returned at the end of their lives; our patterns of material use and waste generation often exceed the capacity of natural cycles to accommodate them, causing habitat loss, threats to biodiversity, pollution, and waste of valuable and finite resources. The Council will stimulate a reduction in the amount of materials being used and disposed of by supporting the 'zero waste Scotland' agenda, encouraging, in order: minimisation of unnecessary material use; re-using resources where possible; and recycling materials that cannot be re-used.

**Reversing Biodiversity Decline:** Biodiversity encompasses all living things; a biologically diverse environment is important in its own right and offers far-reaching benefits to society and the economy. Society has a responsibility to protect biodiversity from the increasing rate of loss that is occurring globally due to human activity. East Dunbartonshire has a rich and varied biodiversity, and the Council will protect and enhance the local natural environment to help to maximise the variety of native species and habitats in East Dunbartonshire, especially those identified as priorities in the Local Biodiversity Action Plan.

**Sustainable Materials:** In addition to the amount (quantity) of resources we use, the type (quality) is an important consideration. Technological advances have produced substances which do not break down naturally when disposed of into land, air or the water system, and their resultant build-up disrupts ecosystems. The Council will seek to use materials that minimise environmental harm, including consideration of embodied energy and chemicals known to be harmful, especially in the construction and refurbishment of buildings. We will also address the legacy of industrial, commercial and agricultural contamination in our area by encouraging, and where necessary enforcing, remediation of affected land.

**Maximising Opportunities to Promote Health and Wellbeing:** Reducing health inequalities and increasing physical and mental wellbeing are key priorities in the Local Outcome Improvement Plan, as is the related aim of promoting safety. Health

and wellbeing are influenced by many factors, from basic physical requirements to higher-level needs such as culture and recreation. The Council will continue to promote health and wellbeing within the workforce and in the wider community and will do this in a way that is joined-up with environmental objectives including active travel, provision of high quality greenspace and offender rehabilitation programmes that protect and enhance the environment.

**Supporting Fairness and Reducing Inequality Locally and Globally:** Equality of opportunity to access jobs, training and services is an important aspect of quality of life. The Sustainability and Climate Change Framework supports the strategic direction and long-term priority of the LOIP, which is “to reduce inequality between the most and least deprived communities” Factors such as disability, ethnic origin, age, gender and geographical location can limit a person’s ability to realise their potential and fully contribute to society, and undermine opportunities to meet their own needs. Through the Sustainability and Climate Change Framework, the Council will work to pursue equality of opportunity in ways that also promote environmental benefits, including addressing fuel poverty and stimulating green jobs and skill development. Global equalities will also be promoted, recognising the impact that we have on the wider world, especially the poorest countries, and ensuring that those we depend on are given a fair deal in return for the goods and services they provide us with.

**Promoting Community Empowerment:** To ensure that goods and services are tailored to the needs of the communities they are serving, and to engender a sense of control and involvement, it is important to engage communities in the design and delivery of services. The Council will work with other public sector partners and directly with community groups to deliver on the Change Community Empowerment (Scotland) Act 2015 to strengthen local democracy by ensuring, as far as possible, that decisions on service priorities and design are shaped by the individuals and communities receiving the services.

**Supporting Local Businesses:** *The Council will encourage the start-up and retention of successful local businesses through supportive policies, provision of infrastructure and sound purchasing decisions.* As part of the Council’s commitment to economic development, various services are provided to support new and existing local businesses. There is scope to further improve these services to better link them to environmental and social goals; the Council will encourage socially-responsible business models and adoption of circular economy principles across the business community and will lead by example by demonstrating efficiency in its day-to-day operations.

**Section 2: Environmental Considerations**

**2.1. Integration of Environmental Considerations in the Sustainability and Climate Change Framework**

2.1.1. This chapter highlights how environmental considerations have been integrated into the final SCCF. **Table 1** highlights how the environmental problems identified in the Scoping and Environmental Reports have been addressed.

**Table 1: Implementing Environmental Considerations**

Sustainability and Climate Change Framework			
Environmental Factor	Environmental Considerations from Scoping/Environmental Reports	Accepted (Yes/No)	Incorporating Environmental Considerations
<b>Population and Human Health</b>	Eight datazones within East Dunbartonshire fall into the top 25% most deprived areas in Scotland; these are located in Hillhead, Lennoxton, Auchinairn and Milngavie. In particular, some areas in Hillhead remain within the 5% most deprived areas in Scotland according to the Scottish Index of Multiple Deprivation.	Yes	<p>The SEA preferred options along with the integration of mitigation measures proposed through the SEA have been carried forward into the Final SCCF. As a result, the policy framework (particularly Ambition and Key Objective 4, 6, 8 and 9 and the Strategic Aims/Commitments) are anticipated to provide significant benefits to population and human health through:</p> <ul style="list-style-type: none"> <li>- provision of a safe, healthy sustainable environment for all communities.</li> <li>- increased awareness and understanding of sustainability and climate change.</li> <li>- active support for physical activity levels and community health improvements throughout the area.</li> <li>- encouraging behavioural changes within the Council and across communities.</li> </ul> <p>The SCCF monitoring framework will ensure that significant impacts on the assets outlined are reduced or prevented, along with the integration of mitigation measures proposed in the SEA Environmental Report.</p>
	There is a significant reliance on public transport and access to primary facilities such as town centres, retail parks, healthcare and leisure, as well as a reliance on vital services that are able to meet the needs of all communities in East Dunbartonshire. This is particularly important due to East Dunbartonshire’s ageing population and existing areas of deprivation.		
	East Dunbartonshire has a potentially unsustainable economic position due to population decline and different service needs.		
	Current use and awareness of sustainability and climate change has scope to be improved through the SCCF. This, along with promoting cultural and behavioural changes will help to achieve the aims of the SCCF and encourage ownership within the local community to contribute to improving the sustainability performance		



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	in East Dunbartonshire.		
<b>Cultural Heritage</b>	East Dunbartonshire has a varied and valued natural and historic cultural heritage, including the Antonine Wall World Heritage Site. In the development of the SCCF, the opportunities that will be identified should consider how they can ensure the protection of the historic environment and encourage sustainable use of East Dunbartonshire’s heritage sites.	Yes	<p>The SEA preferred options along with the integration of mitigation measures proposed through the SEA have been carried forward into the Final SCCF. As a result, the policy framework (particularly Ambition and Key Objective 1, 2, 4, 6, and 7 and the Strategic Aims/Commitments) are anticipated to provide minor benefits in relation to the historic environment. This is mainly through the protection and conservation of historic environment assets from the relating climate change impacts and organisation behavioural changes.</p> <p>The SCCF monitoring framework will ensure that significant impacts on the assets outlined are reduced or prevented, along with the integration of mitigation measures proposed in the SEA Environmental Report.</p>
	East Dunbartonshire is host to tourist attractors across the whole of the Council-wide area such as the Antonine Wall Heritage Site, the Campsie Fells, West Highland Way and Mugdock Country Park. However, increased footfall to the main attractors can result in both positive impacts, such as stimulating the local economy, and negative impacts, such as increasing the negative effects of climate change.		
	The SCCF intends to play a significant role in developing East Dunbartonshire’s sustainable reuse and development agenda of which the historic environment is a key asset within this agenda in terms of the need for climate change adaptation and mitigation measures and the related effects (positive and negative) on the historic environment.		
<b>Biodiversity, Flora and Fauna</b>	East Dunbartonshire has a wide range of designated and non-designated sites, including those of ecological importance and protected species. This is seen through a number of Local Nature Conservation Sites and Important Wildlife Corridors, Tree Preservation Orders and Local Nature Reserves. East Dunbartonshire also has 6 Sites of Special Scientific Interest (SSSI). The management, enhancement and protection of these assets is essential.	Yes	<p>The SEA preferred options along with the integration of mitigation measures proposed through the SEA have been carried forward into the Final SCCF. As a result, the policy framework (particularly Ambition and Key Objectives 1-7 and the Strategic Aims/Commitments) are anticipated to provide significant benefits in relation to the natural environment and biodiversity value. This is specifically represented through Objective – Reversing Biodiversity Decline. The significant positive impacts identified through this objective have the opportunity to be wide-ranging through the removal of the limitation to include</p>
	Biodiversity and greenspace enhancement are current priorities within the Council due to the Open Space Strategy and emerging LBAP. The integration of		

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	<p>appropriate measures in the SCCF should support these priorities. This will be aided by balancing the economic, social and environmental factors of sustainability within the Framework.</p> <p>There is scope within the Framework to consider its role in environmental enhancement and managing ecosystem services including carbon storage, drainage and to alleviate flooding.</p>		<p>only land Council-owned or managed and incorporate the whole of East Dunbartonshire under the same level of protection and enhancement measures in relation to biodiversity value which will represent a more ambitious approach for the Council. This along with the other related Objectives encourage the promotion of the importance of biodiversity to the local environment and encouraged public use. As well as the enhanced protection and conservation of biodiversity assets from the relating climate change impacts and organisation behavioural changes and also the increased awareness of sustainability and its importance.</p> <p>The SCCF monitoring framework will ensure that significant impacts on the assets outlined are reduced or prevented, along with the integration of mitigation measures proposed in the SEA Environmental Report.</p>
<p><b>Soil and Geology</b></p>	<p>There are several sites in East Dunbartonshire that have been identified as peatland. Disturbance to peat has the potential to result in the release of carbon into the atmosphere which contributes to the negative effects of climate change. Consequently, it is vital that peatland is protected.</p>	<p>Yes</p>	<p>The SEA preferred options along with the integration of mitigation measures proposed through the SEA have been carried forward into the Final SCCF. As a result, the policy framework (particularly Ambition and Key Objectives 1, 2, 3, 4 and 7 and the Strategic Aims/Commitments) are anticipated to provide benefits in relation to soil quality and geology. This is mainly through the protection of sensitive soils and the sustainable uses of land.</p> <p>The SCCF monitoring framework will ensure that significant impacts on the assets outlined are reduced or prevented, along with the integration of mitigation measures proposed in the SEA Environmental Report.</p>

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<p><b>Landscape</b></p>	<p>East Dunbartonshire has varying degree of landscapes including the green belt, Local Landscape Areas such as the Campsie Fells/Kilpatrick Hills, and agricultural land. Ensuring that the landscapes are well-connected and protected in terms of retaining local distinctiveness, landscape character and settlement patterns throughout East Dunbartonshire should be considered.</p>	<p>Yes</p>	<p>The SEA preferred options along with the integration of mitigation measures proposed through the SEA have been carried forward into the Final SCCF. As a result, the policy framework (particularly Ambition and Key Objectives 4, 6 and 7 and the Strategic Aims/Commitments) are anticipated to provide benefits in relation to landscape character and local distinctiveness. This is mainly through the protection of sensitive soils and the sustainable uses of land.</p> <p>The SCCF monitoring framework will ensure that significant impacts on the assets outline d are reduced or prevented, along with the integration of mitigation measures proposed in the SEA Environmental Report.</p>
<p><b>Water Quality</b></p>	<p>There are a number of good/moderate quality watercourses in East Dunbartonshire including the Forth and Clyde Canal which is also a Scheduled Monument. These assets require protection in order to reduce, prevent or offset any adverse impacts to water quality.</p> <p>There are a number of sites within East Dunbartonshire’s landscape which are classified as wetland. Wetlands provide vital habitats for a number of species and ecosystem services but their quality is under pressure from external influences such as flooding, developments and climate change.</p>	<p>Yes</p>	<p>The SEA preferred options along with the integration of mitigation measures proposed through the SEA have been carried forward into the Final SCCF. As a result, the policy framework (particularly Ambition and Key Objectives 1, 2, 3, 4 and 7 and the Strategic Aims/Commitments) are anticipated to provide benefits in relation to water quality. This is mainly through East Dunbartonshire maximising resilience levels to the impacts of climate change, supporting the use and procurement of sustainable materials and the reduction of waste generation and material use where possible.</p> <p>The SCCF monitoring framework will ensure that significant impacts on the assets outline d are reduced or prevented, along with the integration of mitigation measures proposed in the SEA Environmental Report.</p>

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<p><b>Air Quality</b></p>	<p>Unacceptably high levels of air pollution can be harmful to the environment and human health. East Dunbartonshire currently has two designated Air Quality Management Areas (Bishopbriggs and Bearsden Cross). These are managed primarily through Air Quality Management Plans and the emerging Air Quality Strategy, although the SCCF has the opportunity to contribute to improving poor air quality, with secondary impact in reducing the urban heating effect and the deterioration of ecosystem services.</p>	<p>Yes</p>	<p>The SEA preferred options along with the integration of mitigation measures proposed through the SEA have been carried forward into the Final SCCF. As a result, the policy framework (particularly Ambition and Key Objectives 1-7 and the Strategic Aims/Commitments) are anticipated to provide significant benefits in relation to air quality. This is mainly through East Dunbartonshire working towards reducing carbon emissions, maximising health and wellbeing for all and maximising resilience levels to the impacts of climate change.</p> <p>The SCCF monitoring framework will ensure that significant impacts on the assets outline d are reduced or prevented, along with the integration of mitigation measures proposed in the SEA Environmental Report.</p>
<p><b>Climatic Factors</b></p>	<p>Domestic emissions account for the largest proportion of carbon dioxide in East Dunbartonshire, although emissions from transport account for the largest proportion of NO<sub>2</sub> and PM10 emissions. This contributes to the effects of climate change which include changing temperatures and rainfall patterns, and increased incidences of extreme weather events. The SCCF will have a direct influence on encouraging the management and adaption to these effects by focusing on actions within the Council, including construction and building operations.</p> <p>Climate change has a direct link to flood risk. The SEPA Flood Risk Map has identified several locations within the East Dunbartonshire Council area which could have a significant impact on the value of East Dunbartonshire’s environment as well as a number of different social and economic impacts.</p>	<p>Yes</p>	<p>The SEA preferred options along with the integration of mitigation measures proposed through the SEA have been carried forward into the Final SCCF. As a result, the policy framework (particularly Ambition and Key Objectives 1-7, 9 and the Strategic Aims/Commitments) are anticipated to provide significant benefits in relation to climatic factors. This is mainly through East Dunbartonshire working towards reducing carbon emissions, climate change mitigation, , maximising health and wellbeing for all, maximising resilience levels to the impacts of climate change, reducing material use and waste and supporting fairness and equality.</p> <p>The SCCF monitoring framework will ensure that significant impacts on the assets outline d are reduced or prevented, along with the integration of mitigation measures proposed in the SEA Environmental Report.</p>

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<p><b>Material Assets</b></p>	<p>As a result of the spatial strategy of the impending Local Development Plan there is potential for a rise in developments in East Dunbartonshire over the life of the Plan. In addition to impact of developments including material use and waste, new developments are likely to require infrastructure improvements which have the potential to further contribute to the effects of climate change. As a result, the SCCF should consider such impacts on sustainability and climate change, as well as identify potential actions to influence planning.</p> <p>It is important that resources in East Dunbartonshire are both managed and procured sustainably. This includes reducing the volume of water used as part of Council operations is at the core of achieving sustainable development with benefits socially, economically and environmentally which can be achieved by changing behaviours and Council operations.</p> <p>Current recycling rates for East Dunbartonshire have scope to be significantly improved to meet and exceed Scottish Government targets. Overall, waste reduction should be encouraged to improve the sustainability and climate change performance in the Council across all Services.</p>	<p>Yes</p>	<p>The SEA preferred options along with the integration of mitigation measures proposed through the SEA have been carried forward into the Final SCCF. As a result, the policy framework (particularly Ambition and Key Objectives 1, 2, 3, 5, 7, 9 and the Strategic Aims/Commitments) are anticipated to provide significant benefits in relation to material assets. This is mainly through East Dunbartonshire working towards reducing material use and waste generations together with the promotion and use of sustainable materials.</p> <p>The SCCF monitoring framework will ensure that significant impacts on the assets outlined are reduced or prevented, along with the integration of mitigation measures proposed in the SEA Environmental Report.</p>

**Section 3: Consideration of Alternatives**

**3.1. Consideration of Alternatives in the Sustainability and Climate Change Framework**


3.1.1. The Environmental Assessment (Scotland) Act 2005 requires the effects of ‘reasonable alternatives’ to be identified, described and evaluated. The Act states that the Responsible Authority shall give ‘the reasons for choosing the plan, or programme as adopted, in the light of the other reasonable alternatives considered’. This section shall describe the process that East Dunbartonshire applied for developing the SCCF.

**3.2. Reasonable Alternatives to the SCCF**

3.2.1. In order to determine the SEA preferred option for the delivery of the SCCF, 3 different strategic alternatives for the delivery of East Dunbartonshire’s SCCF were assessed against the SEA objectives. Consequently, **the SEA preferred alternative was adopted for the development of the final SCCF.**

3.2.2. **Table 2** provides an overview of the strategic alternatives considered for the SCCF.

**Table 2: Strategic Alternatives for EDC SCCF**

Alternative Approach	Outline and Implications of the Strategic Direction	SEA Preferred Strategic Alternative
<b>STRATEGIC DIRECTION 1</b>		
<b>A Framework for East Dunbartonshire Council, responding to the challenges of climate change and sustainable development</b>	This approach will involve partnership working between the Sustainability Policy Team and other teams in the Council to facilitate a change primarily within the Council but with scope to inform improvements in the wider local context in order to provide a means of addressing the challenges associated with climate change and sustainable development. The Framework will give a particular focus to the environmental concerns of sustainability, but with opportunities to address the social and economic implications of sustainability alongside the effects of climate change with an appropriate degree of balance. This approach to delivering a SCCF will be more holistic with a greater opportunity for a wide range of benefits.	
<b>STRATEGIC DIRECTION 2</b>		
<b>Addressing issues of climate change and sustainable development within other Council policies</b>	Issues related to climate change and sustainability are often closely linked to a number of other Council policies that are either in production or already integrated, such as the Local Transport Strategy, Air Quality Strategy and Sustainable Development Strategy, where such challenges are considered. Although there is merit in incorporating measures to improve East Dunbartonshire’s sustainability performance and to reduce the effects of climate change into other policies, these topics would not be the main focus and the importance of it as a priority environmental issue would be weakened.	
<b>STRATEGIC DIRECTION 3</b>		
<b>No Framework /</b>	East Dunbartonshire Council has previously produced a	

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<p><b>Continue with East Dunbartonshire Council's Sustainable Development Strategy (2004)</b></p>	<p>Sustainable Development Strategy (SDS) which provided a framework to promote a strong local economy, ensure social wellbeing and protect the natural environment. The main priorities discussed within the SDS are comparable with those of the proposed SCCF. However, if East Dunbartonshire Council chooses to not produce a new framework and continue with the SDS, the opportunity to respond to address current climate change challenges and improve the Council's sustainability performance will be lost and it is likely that options discussed in the SDS will be irrelevant to East Dunbartonshire's changing economic and environmental state. It is also likely that there would be fewer opportunities to guide sustainable practices within Council services.</p>	
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**Section 4: Consultation**

**4.1. Environmental Report Consultation Responses**

4.1.1. The Environmental Report, which provided details of the likely environmental effects of the SCCF, was published for consultation with the SEA Consultation Authorities from 5<sup>th</sup> July 2016 – 16<sup>th</sup> August 2016. The consultation on the Environmental Report provided an opportunity to respond to the findings of the report and influence the finalised draft of the SCCF.

4.1.2. **Table 3** sets out the responses received from the Consultation Authorities and other interested parties, which are of relevance to the SEA Environmental Report. It states the actions taken as a result of the responses received from the Consultation Authorities.

**Table 3: Consultation Responses**

Consultee	Consultation Response	Incorporating Consultation Response
SNH	Overall we find the Environmental Report to be well presented and the assessment rationale easy to follow. It is also clear how the SEA process has shaped the detail of Sustainability and Climate Change Framework through the refinement of the Strategic Direction, Ambition, Key Objectives, and Strategic Aims.	<p style="text-align: center;"><b>Environmental Report</b></p> <p>Noted</p>
		<p>Noted – amendment to the formatting of tables has been included within the ER and related appendices. This formatting will be reflected in forthcoming assessment tables for clarity and ease of use.</p>
SEPA	We are satisfied that an adequate assessment of the framework has been undertaken and overall would agree with the findings of the assessment. We note that our comments provided at scoping stage have been taken into account and also acknowledge, with reference to our comments regarding renewable heat, the intention to produce a District Heating	<p style="text-align: center;"><b>Environmental Report</b></p> <p>Noted</p>



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Consultee	Consultation Response	Incorporating Consultation Response
	<p>Strategy for the council area. Additionally, whilst we welcome the changes made to Key Objective 3 as a result of the SEA, this may have been further enhanced by reference to energy recovery in line with the Zero Waste Plan. Please note, this response is in regard only to the adequacy and accuracy of the ER and any comments we may have on the framework itself will be provided separately.</p> <p>As the Sustainability and Climate Change Framework is finalised, East Dunbartonshire Council as Responsible Authority, will be required to take account of the findings of the ER and 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 <a href="#">Scottish Government SEA Guidance</a>. A copy of the SEA statement should be sent to the Consultation Authorities via the Scottish Government SEA Gateway on publication.</p>	<p></p> <p>Noted</p>
<p><b>Historic Environment Scotland</b></p>	<p><b>Part 2: Environmental Report</b></p>	
	<p><b>Part 2: Environmental Report</b></p> <p>I welcome that you decided to scope the historic environment into the assessment, and that in considering environmental issues for the sustainability and climate change framework, you identified that sustainable reuse and climate change adaptation and mitigation are important areas for the historic environment.</p>	<p>Noted</p>
	<p><b>Assessment findings</b></p> <p>The Environmental Report as a whole is accessible and well presented. In some cases the rationale for historic environment scoring was unclear, and the assessment commentary could have usefully expanded the reasoning behind these scorings (for instance for Key Objectives 1, 4, 6 and 7, the community capacity building strategic aims, or the natural environment strategic aims).</p>	<p>Noted</p>

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Consultee	Consultation Response	Incorporating Consultation Response
	<p>Following on from our comments in Part One of this letter, the assessment for Key Objective 3 and the Built Environment Strategic Aims could have benefited from a fuller exploration of opportunities for positive benefits for the historic environment through promoting climate change adaptation measures and the sustainable reuse of existing traditional / historic buildings and their fabric.</p>	<p>Assessments amended to reflect comments. The Council is currently developing a Climate Change Adaptation Strategy which will further explore these elements and ensure the links between the Key Objectives and Strategic Aims of the SCCF are carried forward through this emerging Strategy.</p>
	<p><b>Monitoring</b>            You have identified that effects on the historic environment are likely as a result of retrofitting sustainable and renewable technologies to historic assets. However, it is unlikely that these types of effects will significantly influence the percentage of heritage assets at risk, and you could consider replacing this with an indicator that focuses more closely on the predicted effects.</p>	<p>Monitoring Indicator replaced with:</p> <p>Number of applications submitted and approved regarding the installation of sustainable and/or renewable technologies on historic environment assets.</p> <p>Number of developments reusing existing traditional / historic buildings and their fabric.</p>
	<p><b>Consultation</b>            I note that the main Consultation webpage for the draft Framework (<a href="https://www.eastdunbarton.gov.uk/draft-sustainability-and-climate-change-framework-consultation">https://www.eastdunbarton.gov.uk/draft-sustainability-and-climate-change-framework-consultation</a>) does not refer to the Environmental Report (ER). This means that, whilst the ER is available elsewhere on the website, many consultees may be unaware of the ER, with the result that its findings are unable to inform their response to the consultation. In view of this, it is good practice to refer to the ER within the consultative draft and also on the consultation webpage (and any other medium the Responsible Authority may use to invite consultation responses).</p>	<p>Comment noted and amendments to consultation procedures and clarification of future SEA documentation updated.</p>

**Section 5: Monitoring**

**5.1. Monitoring Framework**

5.1.1. The Environmental Report contained a draft monitoring programme, which set out the proposals for monitoring the effects of the SCCF. This allowed the Consultation Authorities (CAs) to provide comments and suggestions regarding the monitoring proposals which were taken into action when establishing the final monitoring framework. The final monitoring framework has been integrated below, incorporated comments from the CAs.

**Table 4: SCCF Monitoring of Action Delivery**

SEA Category	Indicators	Data Source
Population, Human Health	Changes in the deprivation levels in 15-20% SIMD areas.	SCROL
	% increase in overall walking and cycling rates in East Dunbartonshire.	EDC
	Number of Council employees changing their mode of travel to work towards sustainable alternatives.	EDC/Transport Scotland/SPT/Bus Operators
	Number of community growing opportunities created.	EDC
	Eco-school Awards achieved.	
	Number of businesses benefited as a result of Strategic Commitments within the SCCF.	EDC / Transport Scotland / SPT / Bus Operators
	% increase in sustainable business practices e.g. fair trading.	EDC
Cultural Heritage	Number of applications submitted and approved regarding the installation of sustainable and/or renewable technologies on historic environment assets.	EDC/HES
	Number of developments reusing existing traditional / historic buildings and their fabric.	
	Number of people who access heritage sites using active travel alternatives.	
Biodiversity, Flora and	Changes to the presence of different species and habitats	EDC / SNH
	Number of biodiversity projects undertaken (in conjunction with the LBAP)	
	Ecosystem specific indicators, such as area of woodland habitats improved/changed and wetland habitats.	
Soil & Geology	Area of potentially contaminated land remediated.	SNH / EDC / James Hutton Institute
	Changes to number of vacant and derelict land sites in East Dunbartonshire	
	% of peatland improved/deteriorated.	
Landscape	Framework content in line with the Campsies Action Plan.	SNH / EDC
	Changes in extent and quality of green belt resource.	EDC

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Water Environment	Changes to the classification of water bodies in line with the requirements of the Water Framework Directive.	SEPA
	Council reduction in pesticide / fertiliser use.	EDC / SEPA
Air Quality	% change in emissions levels in East Dunbartonshire (NO <sub>2</sub> and PM10 levels are measured continuously within East Dunbartonshire. There are 4 monitoring stations in Bishopbriggs, Kirkintilloch, Bearsden and Milngavie. There are also 43 sites with monitoring tubes for NO <sub>2</sub> around the EDC area)	SEPA / EDC / Scottish Government Air Quality Data
	Changes in pollutant levels within existing Air Quality Management Areas in Bishopbriggs and Bearsden.	EDC / SEPA
	Designation of any new Air Quality Management Areas within East Dunbartonshire.	EDC / SEPA
Climatic Factors	Greenhouse gas output trends for the Council and in East Dunbartonshire.	SEPA / EDC
	Changes in the extent to flooding in relation to SEPA Flood Mapping.	SEPA
	Number of renewable and/or sustainable energy technologies installed within EDC estate.	SEPA / EDC
	Area of peatland/carbon-rich soils improved or deteriorated in terms of carbon capture/storage.	SEPA
Material Assets	Sources of water supply, its local capacity and reduction in water use.	EDC
	Council waste arisings and % recycled/composted.	EDC
	Monitoring of corridors where active travel routes have been provided to determine the impact on traffic levels.	EDC
	Access and use of public transport and active travel networks.	EDC / SPT / Transport Scotland / Bus Operators
	Number of purchase orders procuring sustainable resources.	
	Number of planning applications and developments supporting zero-carbon and zero-waste principles.	EDC

## Section 6: Conclusion

### 6.1. The Influence of SEA on the Sustainability and Climate Change Framework

- 6.1.1. The Strategic Environmental Assessment process has been a useful and informative tool in assisting with the development of the Sustainability and Climate Change Framework (SCCF) and for highlighting the environmental issues and benefits associated with the SCCF. It has been beneficial in assessing the reasonable alternatives available for the implementation of the Framework throughout East Dunbartonshire as well as confirming that the Framework, overall, will have a positive effect on the receiving environment. The assessment process, highlighted throughout the Environmental Report and Appendices, illustrates where the SEA has influenced the decision making process and impacted on the Ambition, Key Objectives and Strategic Aims taken forward into the Framework itself.
- 6.1.2. The views of the Consultation Authorities have been incorporated in to the final version of the Environmental Report and integrated into the adopted East Dunbartonshire Council SCCF. As part of the consultation period, responses received and through the development of other Council PPS or implementation of new legislation, there have been minor amendments to the wording of two Key Objectives with no impact on the assessment findings of each. Single Outcome Agreement has been replaced with LOIP (Local Outcome Improvement Plan) from the 'Supporting Fairness and Reducing Inequality Locally and Globally' and Community Empowerment (Scotland) Act 2015 has been updated within 'Promoting Community Empowerment' Key Objective. In addition to this, the Strategic Aims have also been renamed as Strategic Commitments within the Final SCCF. The text from the original Strategic Aims hasn't changed from that which has been altered and mitigated against through the SEA process.



**Scottish Natural Heritage**  
**Dualchas Nàdair na h-Alba**

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

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

Neil Samson  
SEA Technical Officer  
East Dunbartonshire Council  
Southbank House  
Strathkelvin Place  
Kirkintilloch  
G66 1XQ

Date: 15 August 2016  
Our ref: CNS/SEA/SSEA/01091

Dear Mr Samson

**Environmental Assessment (Scotland) Act 2005**  
**East Dunbartonshire Council**  
**Sustainability and Climate Change Framework - Environmental Report**

Thank you for consulting SNH on the Sustainability and Climate Change Framework and its Environmental Report. We have reviewed these documents in relation to our natural heritage remit and offer the following comments.

**Sustainability and Climate Change Framework**

We support the general aims of the document, particularly those for the natural environment, and offer the following specific comments:

- Page 25, Paragraph 3 – Although a further site, Bargeny Hill, meets the minimum selection criteria for SSSI designation by virtue of its lowland neutral grassland habitat, other factors have to be taken into consideration when deciding whether to designate an SSSI and these are currently being considered by SNH. As a consequence, we recommend that reference to “one proposed SSSI” is removed from the framework at this stage.
- Page 25, Paragraph 4 – Please note that the Carbon and peatland map 2016 has now been published and is available for download as a GIS shape file from our website. For further details, please see the following link to our website - <http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/>
- Page 27, Application to the Green Stimulus Peatland Action fund for additional peatland restoration - Please note that funding for peatland restoration is now available via the Scottish Rural Development Programme. Please see the following

Scottish Natural Heritage, Caspian House, Mariner Court, Clydebank Business Park, G81 2NR  
Tel: 0141 9514488 Fax: 0141 9514510 [www.snh.gov.uk](http://www.snh.gov.uk)

Dualchas Nàdair na h-Alba, Taigh Caspian, 2 Cùirt a' Mharaiche, Pàirc Gnothachais Bhruach Chluaidh,  
Bruach Chluaidh G81 2NR  
Fòn: 0141 9514488 Facs: 0141 9514510 [www.snh.gov.uk/gaelic](http://www.snh.gov.uk/gaelic)

link for further information - <http://www.snh.gov.uk/climate-change/taking-action/carbon-management/peatland-action/information-for-applicants/>

**Environmental Report**

Overall we find the Environmental Report to be well presented and the assessment rationale easy to follow. It is also clear how the SEA process has shaped the detail of Sustainability and Climate Change Framework through the refinement of the Strategic Direction, Ambition, Key Objectives, and Strategic Aims.

We note that our comments on the Draft Population and Human Health indicators at the scoping stage have been taken into account. One minor point – to improve the clarity of the assessment tables, it would be helpful to repeat the title row with the SEA Environmental Factors each time they are assessed to avoid the need to scroll up and down the document.

Should you wish to discuss any of the comments detailed in this response, please do not hesitate to contact Graeme Heenan on 0141 951 4488 or at [Graeme.Heenan@snh.gov.uk](mailto:Graeme.Heenan@snh.gov.uk).

Yours sincerely

**Lyndsey Kinnes**  
Operations Manager  
Strathclyde & Ayrshire

Our ref: PCS/147781  
SG ref: SEA/01091/ER

Neil Samson  
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If telephoning ask for:  
Simon Watt

25 July 2016

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

Dear Mr. Samson

## **Town and Country Planning (Scotland) Acts Sustainability and Climate Change Framework - Environmental Report**

Thank you for your Environmental Report (ER) consultation submitted under the above Act in respect of the Sustainability and Climate Change Framework. This was received by SEPA via the Scottish Government SEA Gateway on 04 July 2016.

We are satisfied that an adequate assessment of the framework has been undertaken and overall would agree with the findings of the assessment. We note that our comments provided at scoping stage have been taken into account and also acknowledge, with reference to our comments regarding renewable heat, the intention to produce a District Heating Strategy for the council area. Additionally, whilst we welcome the changes made to Key Objective 3 as a result of the SEA, this may have been further enhanced by reference to energy recovery in line with the Zero Waste Plan. Please note, this response is in regard only to the adequacy and accuracy of the ER and any comments we may have on the framework itself will be provided separately.

As the Sustainability and Climate Change Framework is finalised, East Dunbartonshire Council as Responsible Authority, will be required to take account of the findings of the ER and 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 [Scottish Government SEA Guidance](#). A copy of the SEA statement should be sent to the Consultation Authorities via the Scottish Government SEA Gateway on publication.

Should you wish to discuss this environmental report consultation, please do not hesitate to contact me on 01698 839 000 or via our SEA Gateway at [sea.gateway@sepa.org.uk](mailto:sea.gateway@sepa.org.uk)

Yours sincerely  
Simon Watt  
Senior Planning Officer

Ecopy: [sea.gateway@hes.scot](mailto:sea.gateway@hes.scot); [sea\\_gateway@snh.gov.uk](mailto:sea_gateway@snh.gov.uk)





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Our ref: AMN/23/667  
Our Case ID: 201601796  
Your ref: 01091 - ENVIRONMENTAL  
REPORT  
22 July 2016

Dear Mr Samson

**Environmental Assessment (Scotland) Act 2005  
East Dunbartonshire Council - Sustainability and Climate Change Framework**

Thank you for your consultation, which I have reviewed on behalf of Historic Environment Scotland in relation to our main area of interest for the historic environment. The first part of this response relates to the Framework, with part two focusing upon its environmental assessment.

**Part 1: The Sustainability and Climate Change Framework**

The draft Framework provides opportunities to create benefits for the historic environment through delivery of the Framework's strategic aims. The benefits identified by the environmental assessment are generated by active travel possibilities and the retrofitting of heritage assets with sustainable technologies to contribute to climate change mitigation. However, we also see scope for delivery of the Framework to do more to encourage adaptation to address the effects of climate change on the historic environment itself, and to promote the valuable role that retention and maintenance of historic environment assets can play in the sustainability agenda.

**Part 2: Environmental Report**

I welcome that you decided to scope the historic environment into the assessment, and that in considering environmental issues for the sustainability and climate change framework, you identified that sustainable reuse and climate change adaptation and mitigation are important areas for the historic environment.

*Assessment findings*

The Environmental Report as a whole is accessible and well presented. In some cases the rationale for historic environment scoring was unclear, and the assessment commentary could have usefully expanded the reasoning behind these scorings (for instance for Key Objectives 1, 4, 6 and 7, the community capacity building strategic aims, or the natural environment strategic aims).

Following on from our comments in Part One of this letter, the assessment for Key Objective 3 and the Built Environment Strategic Aims could have benefited from a fuller exploration of opportunities for positive benefits for the historic environment through promoting climate change adaptation measures and the sustainable reuse of existing traditional / historic buildings and their fabric.

*Monitoring*

You have identified that effects on the historic environment are likely as a result of retrofitting sustainable and renewable technologies to historic assets. However, it is unlikely that these types of effects will significantly influence the percentage of heritage assets at risk, and you could consider replacing this with an indicator that focuses more closely on the predicted effects.

*Consultation*

I note that the main Consultation webpage for the draft Framework (<https://www.eastdunbarton.gov.uk/draft-sustainability-and-climate-change-framework-consultation>) does not refer to the Environmental Report (ER). This means that, whilst the ER is available elsewhere on the website, many consultees may be unaware of the ER, with the result that its findings are unable to inform their response to the consultation. In view of this, it is good practice to refer to the ER within the consultative draft and also on the consultation webpage (and any other medium the Responsible Authority may use to invite consultation responses).

None of the comments contained in this letter should be construed as constituting a legal interpretation of the requirements of the Environmental Assessment (Scotland) Act 2005. They are intended rather as helpful advice, as part of Historic Environment Scotland's commitment to capacity building in SEA.

Please feel welcome to contact me should you wish to discuss this response.

Yours sincerely

Virginia Sharp  
Senior Heritage Management Officer - SEA

## Post-Adoption Statement

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