



Date: 2nd October 2023
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PLACE, NEIGHBOURHOOD AND CORPORATE ASSETS
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Dear SEA Gateway and Consultation Authorities,

**SEA Screening Determination
Local Heat and Energy Efficiency Strategy and Delivery Plan**

I refer to your email dated 1st August 2023 outlining the responses from the Consultation Authorities to the Screening Report that was submitted on 4th July 2023 in relation to the proposed Local Heat and Energy Efficiency Strategy and Delivery Plan.

The Consultation Authorities are in agreement with the Council that the Strategy and Delivery Plan are unlikely to have any significant environmental effects. On 28th September 2022 East Dunbartonshire Council made a determination under Section 8(1) of the Environmental Assessment (Scotland) Act 2005 that the Strategy and Delivery Plan are unlikely to have any significant environmental effects. Therefore, the Strategy and Delivery Plan will not be subject to a full Strategic Environmental Assessment and an Environmental Report will not be prepared alongside the document.

In accordance with Section 10(1) of the Act, a copy of the screening determination along with the Screening Report and Consultation Authority responses will be made available on request as well as on the Council website at www.eastdunbarton.gov.uk/S-E-A. An advert will also be placed in the Kirkintilloch Herald and Milngavie and Bearsden Herald to publicise the screening determination.

If you have any further queries, please don't hesitate to contact Neil Samson (Climate Change Policy and SEA Officer) on 0141 578 8615.

Yours faithfully,

Neil Samson
Climate Change Policy and Strategic Environmental Assessment Officer

SCREENING REPORT

STEP 1 – DETAILS OF THE PLAN

Responsible Authority:

East Dunbartonshire Council

Title of the plan:

Local Heat and Energy Efficiency Strategy and Delivery Plan

What prompted the plan:

(e.g. a legislative, regulatory or administrative provision)

The Local Heat and Energy Efficiency Strategies (Scotland) Order 2022 was enacted by the Scottish Parliament and requires each local authority to prepare a Local Heat & Energy Efficiency Strategy and Delivery Plan by the end of 2023.

Plan subject:

(e.g. transport)

Energy: Energy Efficiency and Heat.

Screening is required by the Environmental Assessment (Scotland) Act 2005.

Based on Boxes 3 and 4, our view is that:

An SEA is required, as the environmental effects are likely to be significant: Please indicate below what Section of the 2005 Act this plan falls within

Section 5(3)

Section 5(4)

An SEA is not required, as the environmental effects are unlikely to be significant: Please indicate below what Section of the 2005 Act this plan falls within

Section 5(3)

Section 5(4)

Contact details:

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Place, Neighbourhood & Corporate Assets Directorate
East Dunbartonshire Council
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G66 1XQ

Date:

4th July 2023

STEP 2 – CONTEXT AND DESCRIPTION OF THE PLAN

Context of the Plan:

Through the Local Heat & Energy Efficiency Strategy (LHEES), the Council aims to drive local delivery of the heat transition, supporting achievement of statutory national emissions reduction targets.

As a forward-looking long-term strategy to be produced in 5-year cycles, it sets out a direction of travel rather than new policies. It will set out pathways and actions through which national targets could be met and as actions are developed over time impact assessment requirements, including SEA and EIA, will be considered at the appropriate scale and points in delivery.

These are the key national plans and strategies underpinning the Scottish Government's ambitions around net zero, and implications for building energy efficiency & heating:

Draft Energy Strategy & Just Transition Plan (2023)

This plan is for the whole energy system in Scotland, including heating, transport, energy generation. Vision: by 2045 a climate-friendly energy system that delivers affordable, resilient, and clean energy supplies for Scotland's households, communities and businesses.

Heat in Building Strategy (2021)

The Heat in Buildings Strategy (HiBS) sets out a pathway for the way in which zero emissions heating systems, accompanied by measures to reduce the amount of energy that is used, will keep us on course to achieve our binding emission reduction targets. It includes a series of actions for the near term and beyond, including the principles that will be applied to ensure that those actions, and accompanying programmes of support, are consistent with fuel poverty objectives and commitments, and with a just transition.

The HiBS introduces LHEES (heat & energy efficiency) as a way to support the coordination of action at the local level to help meet targets in relation to heat & energy efficiency.

Heat Networks (Scotland) Act (2021)

Regulation of heat networks to support objectives of HiBS, specifically to support growth of heat networks in Scotland.

The Act will be supported by a range of regulations, coming into force from 2023 onwards.

Heat Networks Delivery Plan (2022)

The Heat Networks Delivery Plan sets out how the provisions of the Heat Networks (Scotland) Act 2021 and wider policy will contribute to increasing heat networks in Scotland.

Key targets outlined in national plans/strategies:

- Net zero emissions by 2045 and 75% reduction by 2030
- In the year 2040, as far as reasonably possible no household in Scotland is in fuel poverty
- By 2030 emissions from buildings have to be 68% lower than 2020 levels, which requires zero emissions heating in:

The vast majority of 170,000 off-gas fossil fuel heated homes and at least 1 million on-gas homes

- By 2030 the large majority of buildings achieve a good standard of energy efficiency
- By 2033 all homes have the equivalent of EPC C.
- By 2045 our homes and buildings no longer contributing to climate change

LHEES specifically are expected to be primarily driven by the first two of these statutory targets for greenhouse gas emissions reduction and fuel poverty:

- Net zero emissions by 2045 and 75% reduction by 2030.
- In 2040, as far as reasonably possible, no household in Scotland is in fuel poverty.

LHEES is a new duty to support the coordination and delivery of the Scottish Government's objectives and targets in relation to heat and energy efficiency. Specifically, LHEES is a key component of the Government's Heat in Buildings Strategy.

The statutory duties around LHEES have been enacted by the Scottish Government to ensure consistent, comprehensive coverage of LHEES across Scotland, and enable local planning, coordination, and delivery of the decarbonisation of Scotland's homes and buildings.

Description of the Plan:

LHEES is a long-term plan for an entire local authority area to decarbonise heat and improve energy efficiency of the building stock. As set out in LHEES Guidance, they will:

- Set out how each segment of the building stock needs to change to reach net zero.
- Identify strategic pathways and areas for heat decarbonisation and set out the measures for reducing buildings emissions.
- Prioritise actions for delivery of heat decarbonisation.
- Act as a prospectus for where government funding and private investment for heat decarbonisation and energy efficiency investment should be targeted.

The scope of LHEES is focused on energy efficiency and heat decarbonisation. Completion of LHEES Strategies and Delivery Plans by each local authority will support the Scottish Government to understand further the national landscape for the delivery of heat decarbonisation and where there are potential gaps to support the needs and aspirations of local authorities. It should also help to ensure that local authorities are supporting actors delivering changes to buildings and local infrastructure at a suitable rate to help achieve national targets as set out in the HiBS, and that there is a level of standardisation and consistency between local authority LHEES Strategies and Delivery Plans.

Recommended actions will include a portfolio of potential projects around decarbonised heat and energy efficiency improvements. This will cover both domestic and non-domestic sectors and include early consideration of heat networks, heat decarbonisation (e.g., heat pumps) and energy efficiency improvement measures, including addressing poor building energy efficiency as a driver for fuel poverty.

The LHEES will not introduce any new powers, initiate any legislation, or allocate any resources. The LHEES will not set targets, these will be defined by targets set nationally, for example through the HiBS (2021) as outlined in the preceding section. The LHEES will set out potential pathways for achieving building-related targets, steered by the LHEES Guidance and Methodology developed by the Scottish Government. Using technical data, the LHEES will identify areas of buildings which may, for example, be better suited for heat pump deployment, improvements in building energy efficiency and/or heat network infrastructure.

All buildings (domestic & non-domestic) across East Dunbartonshire will fall within the remit of the LHEES. LHEES will not itself take forward any potential works to buildings; rather it will set out how these works might be best undertaken/coordinated to achieve national targets providing a strategic framework to attract investment and target existing and future funding.

The first LHEES will cover the period 2024 to 2029, with a duty for LHEES to be prepared every 5 years. Due to the evolving funding, policy, regulatory and evidence framework LHEES delivery plans will provide a 'live' evidence-base which will consequentially require to be updated regularly. The rate and scale of delivery will equally be shaped by upcoming changes to the national policy, regulatory and funding/financing landscape.

It is important to note the identification of strategic pathways and areas for action and delivery through the LHEES Strategies and Delivery Plans will be indicative only. Site-specific recommendations regarding priorities for implementation are beyond the purpose and scope of this Strategy and Delivery Plan and will be dealt with at the more appropriate scale of site-specific proposals. Any site-specific impacts are equally more substantial

What are the key components of the plan?

The key components of the LHEES comprise:

- Methodology - the approach to preparing the LHEES, the consultation undertaken, and local authority formalities.
- Policy and strategy context - a summary of the key policies and regulations pertinent to the LHEES.
- Local authority progress - a review of relevant work carried out in the council area to date.
- Baselineing - an assessment of the performance of the areas existing building stock.
- LHEES Strategy: a long-term strategy for the improvement of the energy efficiency of buildings and the reduction of greenhouse gas emissions resulting from the heating of such buildings in the context of relevant EPC and net zero targets and includes generation of strategic pathways for assessing options for decarbonising buildings.
- LHEES findings and next steps - identifying next steps based on the LHEES findings.

Have any of the components of the plan been considered in previous SEA work?

Delivery Plan - setting out potential short-term actions stemming from the LHEES providing a prospectus for where government funding and private investment for heat decarbonisation and energy efficiency investment should be targeted. To create an easily accessible, vital (full of reasons for people to visit) and viable (attractive to both visitors and investors in the longer-term) town centre.

Heat in Buildings Strategy (HiBS) Strategic Environmental Assessment Environmental Report (SEA ER)

Overall, the LHEES Strategy sits within the context of the Heat in Buildings Strategy (2021).

The HiBS SEA identifies a range of environmental issues related to energy, energy efficiency, and heat decarbonisation (e.g., challenging weather, poor energy efficiency and reduced heating options (especially in rural areas) can make fuel bills unaffordable, resulting in fuel poverty). The current trajectory is a reduction in carbon emissions from buildings and so the outcomes of LHEES therefore represent an acceleration of, and coordination of action to support, the ongoing trend rather than a departure.

The HiBS SEA concludes the:

- Draft Strategy is likely to have significant positive effects on climatic factors, air, population and human health and material assets.
- Potential for effects in combination with other plans, programmes and strategies has also been considered – HiBS has potential to positively and cumulatively contribute across a wide range of Scottish Government policy areas within the context in which it sits.

The HiBs SEA notes that due to the high-level nature of the draft Strategy there is an inherent degree of uncertainty regarding the environmental impacts which may arise as a result of upscaling of strategically important energy efficiency measures and heat technologies now and in the future. Taking into account uncertainty and potential limitations of the assessment, the Environment Report (section 4.5.1) outlines that “Existing planning and consenting regimes and regulatory processes, allied to good working practices and monitoring, can help to ensure that potential adverse effects are avoided, and positive effects enhanced.” Furthermore, it references that the roll-out of LHEES will provide an important platform to consider both local community and wider national infrastructure issues and their associated potential environmental effects.

However, the first iteration of the LHEES will also be high-level in nature (at the regional rather than national level), and it is unlikely to have committed building-level actions, with generic impacts of energy efficiency/heat decarbonisation measures already considered in the HiBS SEA.

Energy Efficient Scotland 2018: SEA Environmental Report

In addition to the HiBS, LHEES (and district heating) also sits in the context of the Energy Efficient Scotland SEA Environmental Report (2018).

The environmental report identified the impact of regulations required to roll out LHEES will be "likely to have overall positive effects in contributing to meeting GHG emissions reduction targets". Furthermore, it notes the roll out of LHEES is likely to have mixed impact on material assets and

biodiversity, and at the local level installation works may have impacts related to noise, dust and visual impact, however these are likely to be short term in nature, and “mitigated with careful use of construction management planning”.

Regarding cultural impact it notes interventions are only specified and undertaken after full consideration of the likely impact on the building. As the first iteration of the LHEES will be high-level in nature, it is unlikely to have committed building level actions at this stage.

The report also states there is the potential for negative impacts on some aspects of the built environment, for example retrofitting older buildings – however existing mechanisms including “the planning process, EIA, HRA, and regulations relating to the management of protected species, will manage the potential for environmental effects prior to works commencing.”

Furthermore, it notes mitigation mechanisms related to cumulative impacts (relevant in areas designated for their cultural heritage). The potential for adverse impacts from the construction and operation of new energy developments could be further managed through the use of appropriate design and construction management measures at the project level. This should include, where appropriate, Environmental Management Plans.

Heat Networks

The LHEES Strategy will include indicative areas for strategic Heat Network zones. However, the formal designation of heat network zones falls outside the scope of LHEES, as noted in the Scottish Government’s LHEES Guidance. The indicative areas included in LHEES can be used as a starting point for detailed, follow-on work for consideration of heat networks through heat network zoning as required by the Heat Networks Act. Any SEA requirements of formally designating Heat Network Zones including any cumulative impacts and consideration of alternatives – as required under the Heat Networks (Scotland) – will be fully considered at that time of formal designation and review. The Scottish Government’s proforma to support formal heat network zone designation review includes guidance for consultation to include consultees to ensure any environmental impacts can be considered.

As noted in Chapter 8 of the Heat Networks Delivery Plan (HNDP) 2022, alongside the HiBS and during the passage of the Heat Networks (Scotland) Bill, a series of impact assessments, including a Strategic Environment Assessment, were developed and published.

Sections 6.4.11 to 6.4.14 of the HiBS SEA outlines the range of environmental effects considered likely in relation to heat pumps & heat networks including uncertain effects and appropriate mitigating actions. These are set out below:

- Localised mixed/uncertain secondary effects on a range of SEA topics could occur as a result of the deployment of heat pumps and heat networks, the significance of which would be largely dependent on the scale as well as location with respect to sensitive human, natural and cultural receptors.

- Previous SEA work recognises that the installation of district heating network infrastructure such as pipes has the potential for localised environmental effects including short term negative effects on material assets from new development activities. Localised negative effects on population and human health could also arise such as, through noise linked to the operation of heat pumps. Potential localised negative effects on landscape and cultural and historic heritage could also occur as a result of at scale changes to infrastructure necessary for deployment. For example, the installation of an individual air source heat pump would require an external unit, which would require a place outside the home where it can be fitted to a wall or placed on the ground, including space around it to ensure the flow of air. The size of the unit could vary greatly depending on the building's heat demand and the local characteristics.
- Localised positive effects on material assets and population and human health could also occur from support for more affordable and locally available supplies of heat associated with heat networks. Effects could be maximised where individual heat pumps are combined with appropriate energy efficiency measures which makes them highly effective in most buildings.
- Any potential adverse impacts are considered likely to be mitigated by existing mechanisms such as the planning system as well as environmental guidance and on-site management measures and these, as well as potential strategic mitigation opportunities, are discussed further in Section 7 of the HiBS SEA.

A further commitment is made in the HNBP to assess whether there is a need for additional impact assessments beyond those carried out for the Heat in Buildings Strategy and the Heat Networks (Scotland) Bill as work is progressed to implement individual provisions of the Heat Networks (Scotland) Act and wider policy and delivery framework on heat networks. As the HNBP is delivered, the Scottish Government has committed to taking these impact assessments and associated mitigating actions into account.

As outlined in the HiBS SEA (section 3.5.5), detailed proposals for potential Permitted Development Rights (PDR) for Heat Networks are being considered during Phase 4 of the Scottish Government's PDR review programme.

Energy Efficiency Measures

Sections 6.4.8 to 6.4.10 of the HiBS SEA outlines the range of environmental effects considered likely in relation to energy efficiency measures, including uncertain effects and appropriate mitigating actions. These are set out below:

- Localised mixed/uncertain secondary effects on a range of SEA topics could occur as a result of the deployment of energy efficiency measures. Any potential adverse effects are considered likely to be largely localised because they relate to the fabric of individual buildings.
- For example, the installation and operation of efficiency measures could in principle give rise to some localised negative effects on biodiversity (as a result of works undertaken to roof cavities (i.e. insulation) which may hold bat roosts), on cultural and historic heritage (such as directly from visual impacts on settings), and on landscapes (such as directly from

visual impacts on settings). Localised negative effects on population and human health and air quality in the short term could also occur (such as from construction activities and development work) but these are considered likely to be temporary in nature. Localised positive effects on population and human health are also considered likely (as a result of reducing the cost of achieving thermal comfort).

- Any potential adverse impacts are considered likely to be mitigated by existing mechanisms such as the planning system as well as environmental guidance and on-site management measures. Local mitigation is discussed further in Section 7 of the HiBs SEA.

Permitted Development Rights (PDR) review Sustainability Appraisal (SA) Update

Phase 3 of the review of PDR is currently out for consultation. The PDR focuses in domestic and non-domestic zero/low carbon technologies including those relevant to the LHEES (air, water, and ground source heat pumps; replacement windows; etc.). To accompany the consultation a Sustainability Appraisal Update has also been published which describes the proposed PDR changes for both domestic and non-domestic buildings, the potential positive and negative impacts of each technology, and appropriate mitigation including use of HES guidance on micro-renewables/windows in historic buildings.

The report also covers secondary, cumulative, and synergistic effects. Specifically, it notes “Chapter 21 of the 2019 SA considered possible cumulative and synergistic effects arising from all the developments included in the PDR work programme. At that stage, it was not possible to identify which changes in PDR would be progressed therefore a summary of the maximum potential synergistic and cumulative effects was provided.” As previously noted, the first LHEES will also be high-level in nature with specific building level projects unlikely to be identified for progression. Therefore, the cumulative impacts identified would be similar to the ones in PDR SA. The PDR SA also covers potential cumulative impacts on cultural heritage.

As noted above, detailed proposals for new micro-renewable or heat network permitted development rights are anticipated to be considered during phase 4 of the Scottish Government’s review programme.

Climate Change (Scotland) Act 2009: Section 63

Covers assessments to improve energy performance.

Notes an approach of using existing EPC assessment methodology minimises implementation costs, minor carbon emission savings from using new assessments; work to improve energy efficiency will be required to comply with the current building regulations; and any improvement works will provide positive benefits to environmental impact of a building by reductions in resource use, carbon dioxide emissions and improved energy efficiency.

Scotland’s Climate Change Plan (2018) and Energy Strategy (2017) – Joint SEA Environmental Report

Covers district heat networks, heat pumps, loft and wall insulation.

Notes installation of these could have positive impacts on climatic factors, air quality, material assets, population and human health. Potential temporary

localised adverse impacts linked to construction/ installation works (population and human health, soil, water, air and biodiversity) are identified, and longer-term potential impacts related to landscape and cultural heritage.

Many of the potential adverse effects will be considered as appropriate under existing mechanisms such as the planning or consenting process, environmental management plans, etc.

Though this SEA, references LHEES as considering cumulative impacts, it is important to note LHEES has evolved significantly since 2017/18, and the updated position is covered in the Heat in Buildings Strategy and Draft Energy Strategy (2023).

Climate Change Plan Update 2020: SEA Environmental Report

Covers low-carbon heat and energy efficiency measures for industry and buildings.

The SEA states policies, proposals and incentives to support the uptake of low-carbon technologies, district heating networks, and the installation of energy efficiency measures may reduce the demand for electricity and heat from fossil fuel sources. This will have positive effects on climatic factors.

It also notes energy efficiency measures will likely result in a reduction in the demand for energy, thereby reducing pressure on supply and distribution networks, having positive effects on material assets. Further benefits are recorded for air quality, population and human health.

Additional benefits of low-carbon heat technologies could help improve security of supply and reduced pressure on waste management facilities through the promotion and uptake of the circular economy. This could reduce reliance on finite resources and limit carbon generation from the processing of such materials, having benefits for both material assets and climatic factors.

Potential for temporary localised adverse impacts (population and human health, soil, water, air and biodiversity), as a consequence of construction and infrastructure improvement. Potential impacts are likely to be mitigated by existing mechanisms such as the planning system, SEPA regulation, EIA, HRA and on-site management measures.

Energy Efficient Scotland (2018): SEA Environmental Report

Covers LHEES and District Heating Regulation.

Identifies the impact of regulations required for the roll out of LHEES "likely to have overall positive effects in contributing to meeting GHG emissions reduction targets," and likely to have mixed impact on material assets and biodiversity.

At the local level installation works may have impacts related to noise, dust and visual impact, however these are likely to be short term in nature, and "mitigated with careful use of construction management planning."

Regarding cultural impact it notes interventions are only specified and undertaken after full consideration of the likely impact on the building.

Note potential for negative impacts on some aspects of the built environment, (retrofitting older buildings) – however existing mechanisms including "the planning process, EIA, HRA, and regulations relating to the management of protected species, will manage the potential for environmental effects prior to works commencing."

Notes mitigation mechanisms related to cumulative impacts (relevant in areas designated for their cultural heritage).

Infrastructure Investment Plan (2021): SEA Environmental Report

Covers district heat networks, and states these are likely to give rise to significant positive impacts for climatic factors through climate change mitigation and adaptation.

Draft Energy Strategy and Just Transition Plan (2023): SEA Environmental Report

The SEA covers energy efficiency measures (insulation), heat pumps, heat networks within the heating and cooling our buildings assessment table.

The SEA reports significant positive direct effects on climatic factors, and population & human health; and minor positive direct effects on air.

Minor negative direct effects are identified for:

- Soil and geology related to development of ground source heat pumps and heat networks - noting these would form part of a range of renewable technologies being developed, and the footprint of these varies depending on the approach used, and is localised in extent
- Biodiversity related to improving energy efficiency of buildings – impacts are likely to be temporary in nature.
- Cultural heritage related to external changes to improve energy efficiency or retrofit renewable energy. It is noted these impacts will be localised, and not widespread.
- Landscape related to external changes to improve energy efficiency or retrofit renewable energy

Mixed impacts are recorded for material assets, with improved energy efficiency improving the quality of buildings and reducing energy demand; however minor negative indirect effects will arise from resources required.

Fuel Poverty Strategy

SEA screened out, noting environmental consideration in respect of potential works undertaken to improve the energy efficiency of homes, decarbonise their heat supply and tackle fuel poverty are considered during the development of Scotland's Energy Efficiency Programme (SEEP) – see Energy Efficient Scotland above.

It also states energy efficiency programmes currently available from the Scottish Government's Home Energy Efficiency Programmes which are designed to improve energy efficiency and tackle fuel poverty are referenced in the Draft Climate Change Plan and the Draft Scottish Energy Strategy SEA Environmental Report published in January 2017.

Housing to 2040

SEA screened out, noting the plan is likely to create some new expectations, but those which have environmental implications are already known as they relate to existing commitments which have previously been subject to SEA.

The plan aims to map out the steps to enable housing to deliver good quality, energy efficient, zero carbon housing, meeting targets already set out elsewhere, including working towards net-zero emissions by 2045 as set out in the Climate Change Plan and Energy Strategy; making Scotland's homes warmer, greener and more energy-efficient by 2040 as set out in the Energy Efficient Route Map.

National Planning Framework 4 (2023): SEA Environmental Report

The heat and cooling policy references LHEES in the framework document.

For this policy the SEA notes:

- Significant long-term positive effects on climatic factors.
- Positive long-term effects for air quality are expected where heat energy is generated from low or zero emissions sources.
- Positive effects on built material assets and population & human health are expected.
- No significant effects on water expected, however consideration may need to be given to longer term impacts on water quality from individual technologies.
- Uncertain impacts on biodiversity, which would be managed at plan or project level.
- Impacts on soil from installation of heat network infrastructure would be managed at plan or project level.
- New infrastructure has potential to negatively impact historic assets and their setting, however the emphasis on placemaking within the overall draft NPF4 and the requirements of the Historic Assets and Places draft policy, should limit where potentially negative impacts could arise.
- Potential for localised negative impacts associated with new infrastructure. These will be site specific and would be managed through the plan and project consenting stages.

EDC Sustainability and Climate Change Framework: SEA Environmental Report

Through the Corporate Support Functions within the SCCF, EDC identified several priority policy areas for development to support improved performance in relation to sustainability and climate change. This includes a District Heating Strategy, which will now be delivered through the LHEES and Delivery Plan. This was assessed and committed to within the SCCF to identify opportunities to deliver greener, more cost-effective sources of heat, with particular emphasis on corporate buildings and housing stock and also identifying opportunities to collaborate with the wider public and private sectors.

The Built Environment section incorporates future actions including construction methods, with a particular emphasis on energy and heat-efficient buildings and sustainable drainage systems. The development of a District Heating Strategy was also intended to enhance the heat efficiency of new and existing developments.

The SCCF SEA Environmental Report identified significant positive effects in relation to the majority of environmental factors, including population and human health, biodiversity, material assets and climatic factors, anticipated through various elements of the strategic approach to sustainability and climate change. Those relating to the LHEES content, include:

- _ Exploring the role of the historic environment with respect to sustainable reuse and development agenda, climate change adaptation and mitigation.
- Commitments towards climate change mitigation and the reduction of carbon emissions throughout Council-owned properties and operations in terms of energy efficiency improvements and decarbonising heat.
- The Framework is intended to reduce material use and the generation of waste through the implementation of sustainable construction methods and techniques employed throughout Council development projects.

Local Development Plan 2: SEA Environmental Report

Contributing to sustainable development is the purpose of the LDP through the development and use of land in the best long-term public interest. Significant positive environmental impacts were considered through assessment in particular for climatic factors and population and human health through the overall Plan Objectives, including:

- Promote sustainable development, as part of a low carbon economy, which is energy efficient, improves air quality and contributes to net zero emissions by 2045 and climate change mitigation and adaptation.

Policy 9. Climate Change, Sustainability and Energy Infrastructure

The LDP2 development strategy, as set out above, is underpinned by a commitment to contributing to national climate change targets and objectives and to promoting sustainability in the wider sense. This commitment sits at the heart of the local development plan process and will inform decisions on all development proposals. New development proposals will therefore be expected to demonstrate how climate change mitigation, climate change adaptation and wider sustainability have been considered as part of the design process.

All new developments must be designed in such a way that they minimise carbon emissions in accordance with the energy hierarchy below:

- Reduce the demand for energy.
- Maximise the energy efficiency of buildings.
- Energy generation from renewable or low carbon sources.
- Incorporating conventional energy sources.

The LDP2 is supportive of district heat networks and communal heating systems as an important way of reducing heat demand by ensuring efficient use of waste heat. Combined heat and power fired by low-emission sources and/ or microgeneration of heat and heat recovery technologies will be particularly encouraged. All significant/anchor developments, substantial developments and development adjacent to heat networks/sources will be expected to establish the potential for, and viability of, decentralised energy centres and heat networks.

The assessment for the policy identified predominantly positive impacts, with some uncertainties identified. Through this policy all applicants must ensure that their proposals minimise carbon emissions, contribute towards or impact adaptation measures and address key sustainability requirements. Various additions/enhancements to the policy included the requirement for a Sustainability and Energy Statement to be provided by developers; this will ensure greater energy efficiency in relation to developments and ensure the Council can keep track of measures through the Statement.

This policy supported by the new Building Standards Regulations will further enhance the required set standards for specific types of developments reaching a higher-level of sustainability and energy in emissions standards. Higher building standards end energy efficiency will play a key role in tackling issues relating to fuel poverty i.e. it is particularly important for low income families that their homes are energy efficient. The policy also includes a stronger emphasis on local heat networks with links to the emerging LHEES.

The LDP2 SEA ER assessed the policy and related elements to LHEES in terms of building standards enhancements and efficiencies and tackling fuel poverty, could have a significant positive impacts in relation to Climatic Factors, Water Quality and Population and Human Health, as well as further positive impacts to Cultural Heritage, Biodiversity Flora and Fauna and Air Quality.

Emerging EDC Climate Action Plan: SEA being undertaken

The emerging Climate Action Plan CAP vision and objectives (still to be finalised) will contain content relating to the reduction of carbon emissions from buildings, promoting heat decarbonisation and ensuring that this is done in a way that addresses fuel poverty.

The CAP will contain a section on buildings, which will include strategic commitments and specific actions for achieving net zero in the building stock and improving energy efficiency. These will sit alongside and provide the strategic context for the delivery actions in the LHEES and Delivery Plan.

The corporate and net-zero pathways currently being developed through the Evidence & Options Report will be assessed in terms of their environmental effects and the preferred net zero pathways will be incorporated into the CAP. This will set the net zero targets and milestones for the Council and for East Dunbartonshire as a whole, while also setting the strategic framework for the LHEES.

In terms of timescales, the final LHEES is scheduled to be approved in June 2024, while the final CAP is not scheduled to be approved until September 2024. However, the Draft CAP and ER is scheduled to be completed in February 2024 and can therefore influence the finalisation of the LHEES.

In terms of your response to Boxes 7 and 8 above, set out those components of the plan that are likely to require screening:

It is considered that only the Delivery Plan section of the LHEES requires screening as the other components of the LHEES are for information only.

**STEP 3 – IDENTIFYING INTERACTIONS OF THE PLAN WITH THE ENVIRONMENT AND
CONSIDERING THE LIKELY SIGNIFICANCE OF ANY INTERACTIONS (Error! Reference source not found.)**

Plan Components	Environmental Topic Areas										Explanation of Potential Environmental Effects	Explanation of Significance
	Biodiversity, flora and fauna	Population and human health	Soil	Water	Air	Climatic factors	Material assets	Cultural heritage	Landscape	Inter-relationship issues		
LHEES Strategies including Strategic Zoning (generic to all Local Authorities)	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗	No potential environmental effects at this stage. Strategic zones and pathways are split out by pre-defined geographical areas such as intermediate zone or data zone. Specific actions will not be assigned against strategic zones due to the high-level nature of these. They are intended to understand the baseline performance of building stock, and the scale of potential and initial areas of focus. The guiding principles of LHEES were fully considered during the preparation of the HiBS Strategy, which underpins the actions taken forward in LHEES. The Strategic pathways (captured at intermediate or data-zone level) are included as part of the LHEES Strategy and are used to present information on a range of themes such as building stock performance, fuel poverty probability rates, etc.	
LHEES Delivery Plans including Delivery Plan Area Zoning.	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗	It is not envisaged the LHEES delivery plan will have a sufficient level of granularity to differentiate it from existing SEAs from the national plans. The ability to complete area-based analysis is constrained in the detail of not being able to state exactly what area and building-level actions could be delivered. Subsequent iterations of the LHEES and formal designation of heat network zones, as required under separate duties in the Heat Networks (Scotland) Act 2021, would be subject to an appropriate level of assessment, against the requirements of the Environmental Assessment (Scotland) Act 2005.	

STEP 4 – STATEMENT OF THE FINDINGS OF THE SCREENING

Summary of interactions with the environment and statement of the findings of the Screening:

(Including an outline of the likely significance of any interactions, positive or negative, and explanation of conclusion of the screening exercise.)

East Dunbartonshire Council consider that SEA is not required on the basis of the evidence presented in this document.

As stated above it is our view that the overarching national strategies have already been environmentally assessed. The LHEES aims to identify pathways to enable buildings within the Council area to decarbonise heat and improve energy efficiency of the building stock, working towards net-zero emissions by 2045 as set out in the Heat and Buildings Strategy, Climate Change Plan and Energy Strategy, Draft Energy Strategy and Just Transition Plan and deliver our climate change commitments including helping address fuel poverty. Those actions which have environmental implications are already known as they relate to existing commitments, which have previously been subject to SEA as demonstrated in this document.

In addition to this, the Screening Report also sets out the relationship between EDC's emerging Climate Action Plan (CAP). The corporate and net-zero pathways currently being developed through the Evidence & Options Reports will be assessed in terms of their environmental effects and the preferred net zero pathways will be incorporated into the CAP. This will set the net zero targets and milestones for the Council and for East Dunbartonshire as a whole, while also setting the strategic framework for the LHEES.

It is considered that only the Delivery Plan section of the LHEES requires screening as the other components of the LHEES are for information only. It is our view that the Delivery Plan, due to evolving national policy, regulatory and funding landscapes does not present detailed proposals within each component of the plan and have not yet been fully developed in the 1st iteration of LHEES. Therefore, we do not envisage the LHEES delivery plan having a sufficient level of granularity to differentiate it from existing SEAs completed for the existing Scottish Government plans and strategies and will not have significant environmental effects, especially as these options will still be subject to planning & other consenting regimes at the building-level.

The ability to complete area-based analysis is constrained in the detail of not being able to commit what areas and/or building level actions could be delivered within the existing funding, regulatory and policy landscape which, as outlined above, is currently under review and reform. However, any new framework for projects, programmes, or strategies such as the HN zoning, which are developed to deliver the outcomes of the LHEES will be subject to an appropriate level of environmental assessment, against the requirements of the Environmental Assessment (Scotland) Act 2005, either as a separate SEA process or part of an existing mechanism such as the LDP and corresponding SEA process. Further to this, any known targets, and the pathways to achieve them which may be incorporated within the plan (e.g., energy efficiency targets, heat

decarbonisation measures) have already been assessed in the context of existing Scottish Government plans & strategies.

Therefore, it has been determined that, under Section 5(3) of the Environmental Assessment (Scotland) Act 2005, a full SEA is not required for the 1st iteration of the LHEES.

When completed send to: SEA.gateway@scotland.gsi.gov.uk or to the SEA Gateway, Scottish Government, Area 2H (South), Victoria Quay, Edinburgh, EH6 6QQ.

Neil Samson

From: sea.gateway@sepa.org.uk
Sent: 26 July 2023 07:51
To: SEA_Gateway@gov.scot
Cc: sea_gateway@nature.scot; sea.gateway@hes.scot
Subject: SEPA Ref 9710-SEA01820

OFFICIAL



Environmental Assessment (Scotland) Act 2005
SEA01820 - Local Heat and Energy Efficiency Strategy (LHEES) and Delivery Plan
Screening report
SEPA ref: 9710

Thank you for consulting SEPA on this Screening Report by way of your email of 5 July 2023.

In accordance with Section 9(3) of the Environmental Assessment (Scotland) Act 2005 we have reviewed the screening report using the criteria set out in Schedule 2 of the Act. In regard to our main areas of interest (air, water, soil, human health, material assets and climatic factors) **we agree with the conclusions of the screening report** that the proposed PPS is **unlikely to have** significant environmental effects.

Although we are of the view that significant environmental effects are unlikely, it is for the Responsible Authority to make a formal determination taking into account the consultation responses received.

The Scottish Government SEA Gateway held an event for Local Authorities and the Consultation Authorities at the end of May 2023 to discuss whether the strategies would require an SEA. It was concluded that the first round of strategies and delivery plans were unlikely to have a significant effect on the environment so an SEA would not be required. The strategies would not introduce any new policies or targets as these will already have been set out at a national level in higher level plans and programmes such as the Scottish Government's Heat and Buildings Strategy. These higher-level plans have gone through the SEA process. The LHEES will include indicative areas for strategic heat network zones but the formal designation of heat network zones falls outside the scope of LHEES.

If you would like to discuss this consultation response, please do not hesitate to contact me by email or via our SEA Gateway at sea.gateway@sepa.org.uk.

Yours sincerely
Jonathan Werritty

OFFICIAL



NatureScot
NàdarAlba

Scotland's Nature Agency
Buidheann Nàdair na h-Alba

Neil Sampson
Place, Neighbourhood & Corporate Assets Directorate
East Dunbartonshire Council
Southbank House
Strathkelvin Place
Kirkintilloch
G66 1XQ

Our Ref: CEA171642
Date: 14 July 2023

Dear Neil,

**Environmental Assessment (Scotland) Act 2005: Local Heat & Energy Efficiency Strategy and Delivery Plan
Screening Determination**

Thank you for your screening report submitted on 04 July 2023 via the Scottish Government SEA Gateway in respect of the above plan.

NatureScot has considered your screening report using the criteria set out in Schedule 2 of the 2005 Act. In terms of our interests, we consider that the above Plan is unlikely to have significant environmental effects.

Please note that this consultation response provides a view solely on the potential for the plan or programme to have significant environmental effects. We cannot comment on whether or not the plan or programme meets other criteria determining the need for SEA as set out in the Act.

Should you wish to discuss this screening determination, please do not hesitate to contact Jimmy Hyslop on jimmy.hyslop@nature.scot or via NatureScot's SEA Gateway at sea_gateway@nature.scot.

Yours sincerely

Lyndsey Kinnes
Operations Manager – West Central Scotland



HISTORIC
ENVIRONMENT
SCOTLAND

ÀRAINNEACHD
EACHDRAIDHEIL
ALBA

By email to: sea_gateway@gov.scot

Neil Samson
Place, Neighbourhood & Corporate Assets
Directorate
East Dunbartonshire Council
Southbank House
Strathkelvin Place
Kirkintilloch
G66 1XQ

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131-668-8716
Switchboard: 0131 668 8600
HMConsultations@hes.scot

Our case ID: 300066924
Your ref: 01820 Screening
17 July 2023

Dear Neil Samson

[Environmental Assessment \(Scotland\) Act 2005](#)
[01820 Screening – East Dunbartonshire Council - Local Heat and Energy Efficiency Strategy and Delivery Plan](#)

Screening Report

Thank you for your consultation which we received on 04 July 2023 about the above screening report. We have reviewed this report in our role as a Consultation Authority under the above Act, in accordance with the requirements of Section 9(3). In doing so we have used the criteria set out in Schedule 2 for determining the likely significance of the effects on the environment.

Historic Environment Scotland's view

In light of the information and reasoning set out within the screening report, we **agree** with your view that there are **unlikely to be significant environmental effects for the historic environment** as a result of this first iteration of the Strategy.

Next steps

The Environmental Assessment (Scotland) Act 2005 requires you as the Responsible Authority to determine whether an environmental assessment is required. You must then notify the Consultation Authorities within 28 days of making this determination. This may be done via the SEA Gateway (sea_gateway@gov.scot).

We hope our advice is helpful to you in making this determination. Please feel welcome to contact us if you have any questions about this response. The officer managing this case is Virginia Sharp who can be contacted by phone on 0131 668 8704 or by email on Virginia.Sharp@hes.scot.

Yours sincerely

Historic Environment Scotland