

Policy and Sustainability Committee

10.00am, Thursday, 17 November 2022

2030 Climate Strategy - Environmental Assessment Consultation and Review

Executive/routine
Wards
Council Commitments

1. Recommendations

It is recommended that the Policy and Sustainability Committee:

- 1.1 Note the findings from the consultation process on the environmental report as summarised in Appendix 1;
- 1.2 Agree the proposed actions in response to the findings of the Strategic Environmental Assessment as highlighted in Appendix 3, subject to on-going analysis of available resources;
- 1.3 Note the overview of key work undertaken to support the 2030 Climate Strategy delivery plan, and in particular the establishment of the IIPB and City Partnerships;
- 1.4 Note the increasing financially challenging context and agree the prioritisation of the decarbonisation of transport; active and public transport; climate change adaptation; energy efficiency of public buildings and the delivery of infrastructure that enables a 'net zero' city as the most impactful ways of reducing the city's emissions and ensuring future resilience to climate impact;
- 1.5 Thank Dr Sam Gardner, the current chair of the Edinburgh Climate Commission and the other volunteer commissioners for their contribution over the last three years to climate action in Edinburgh and, in particular, their support in the development of the Climate Strategy and the City Climate Compact; and
- 1.6 Note that the Edinburgh Climate Commission (ECC) is now reviewing its purpose and will progress, subject to the decision of ECC members, as part of an independent programme funded by PCAN.

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2030 Climate Strategy environmental assessment consultation and annual review

2. Executive Summary

- 2.1 The Council approved the publication of the 2030 Edinburgh Climate Strategy while acknowledging that both the Strategy and the Implementation Plan would operate as a 'live document' that would need to be reviewed at key points, including to take account of the outcomes of the Strategic Environment Assessment (SEA).
- 2.2 Sustainability remains a key priority for the Council. However, the Council is facing a challenging financial outlook at the same time as reduced capacity. Therefore, it is more important than ever to prioritise the Council's interventions to ensure that available resources are focused on the areas which will have the greatest impact in reducing the city's emissions.
- 2.3 The Council's priorities for climate action have been centred around transport, climate change adaptation and the delivery of infrastructure that enables a 'net zero' city such as energy efficient buildings.
- 2.4 The city's performance against the net zero target is reported elsewhere on this agenda. The latest annual progress report covers 2020/21 and shows that Edinburgh continues to meet its annual target. However, the report acknowledges that the pandemic has contributed to that target and that to be able to meet future targets, the pace of climate action needs to significantly accelerate.
- 2.5 This report also notes that the Edinburgh Climate Commission has now run for three years and that the current Chair, Dr Sam Gardner will step down in December. Elected members are invited to express thanks to Dr Gardner and the other volunteer commissioners for the support and advice they have offered the city as it established its climate plans and delivery partnerships and to note the next stages of development for the Commission.

3. Background

- 3.1 The Committee set out the 2030 Climate Strategy and implementation plan in November 2021 noting that these would operate as a 'live document' and would need to be reviewed at key points. This included taking account of the findings and recommendations of the Strategic Environment Assessment.

- 3.2 In Scotland, public bodies and private companies which operate in a public character, such as utility companies - are required to assess, consult on, and monitor the likely impacts that their plans, programmes and strategies will have on the environment. This process is known as Strategic Environmental Assessment (SEA).
- 3.3 To meet this duty, an SEA of the 2030 Climate Strategy was undertaken with the Environmental Report (as agreed by this committee) issued for public consultation in August 2022 for consultation with statutory authorities (Scottish Environmental Protection Authority (SEPA), Historic Environment Scotland (HES), and NatureScot) and the wider public. This report provides a summary of the findings of that consultation and proposed actions, alongside reporting on progress in delivery of key actions in the 2030 Climate Strategy.
- 3.4 In addition to this report, separate papers are also provided for the Committee's consideration relating actions to reduce Council emissions - the Public Bodies Climate Change Duties report and CERP Annual progress report.

4. Main report

SEA Consultation and review findings

- 4.1 The scope of the SEA itself reflected the fact that parts of the strategy will, or have, undergone their own SEA such as the City Plan and the City Mobility Plan. A sifting exercise was undertaken to determine which sections of the strategy had already been subject to SEA and this was presented as an Appendix to the Environmental Report.
- 4.2 The consultation on the draft Environmental Report and in line with the live strategy approach has presented a broader opportunity for key partners and the public to reflect on the strategy a year on from first publication
- 4.3 Feedback received from the public during this consultation broadly reflects feedback which was considered as part of the initial strategy consultation in 2021. Responses on the climate strategy itself were minimal but also of a mixed nature (15 agree that the strategy has the right vision and approach for Edinburgh, 16 disagree, 18 don't know). Some agreed that the strategy had the right vision and approach. However, some were more openly sceptical of the requirements to cut carbon emissions, the capacity of the Council and partners to effect change at scale or within time, and the benefits that would result from moving to a zero-carbon lifestyle.
- 4.4 Previous engagement highlights that climate scepticism is a factor which influences uptake and support for change and support for a net zero future is not universal. However, these submissions do not override the overwhelming support which was received for the strategy in 2021 when over 300 citizens responded.
- 4.5 In respect of the statutory consultation, there were a small number of responses from the public directly related to the Environment Assessment. Issues raised included;

- 4.5.1 **consideration of strategic alternatives.** The rationale for the approach taken was presented in section 3.7 of the Environmental Report and agreed with the statutory authorities.
- 4.5.2 **a request for a simplified version of the report.** A non-technical summary was provided as part of the Environmental Report. The forthcoming Post Adoption Statement will also provide a less technical summary of the purpose of the Environment Assessment and how the strategy has been updated.
- 4.6 Feedback from consultation authorities on the findings of the Environment Assessment was broadly positive. Detailed responses are available in Appendix 2. A few minor amendments were suggested to the baseline and policy summaries provided within the SEA and these will be picked up in the forthcoming Post Adoption Statement.
- 4.7 The SEA recommendations to enhance the Climate Strategy Implementation Plan and how the Council would take these recommendations on board are provided in Appendix 3.

Progress in delivery of 2030 Climate Strategy Priorities

- 4.8 The Committee has received a number of reports detailing progress on the council and city emissions targets including the public bodies reporting duties which details activity undertaken. However, in summary:
 - 4.8.1 Work is now underway to build 444 net-zero homes, with 195 for social rent, as part of the wider £1.3 billion Granton waterfront regeneration project. The project is set for completion in 2025. In total, over the next 10 – 15 years, the regeneration will deliver around 3,500 new net zero carbon homes (over 35% of them affordable); a primary school and health centre, commercial, creative, and community space, a district heating network and a new coastal park. New active travel and public transport infrastructure will be created throughout the regeneration area, including new cycle paths and a mobility hub.
 - 4.8.2 The Council, acting on behalf of the wider BioQuarter partnership, is appointing Ramboll to carry out a feasibility study on the development of a heat network at Edinburgh BioQuarter in southeast Edinburgh.
 - 4.8.3 Stages one and two of the statutory Local Heat and Energy Efficiency Strategy (LHEES) have been completed; the Council is currently in the process of procuring support with stages three to eight.
 - 4.8.4 A new Climate Ready Edinburgh adaptation plan is in development, informed by an updated climate change risk assessment commissioned by the Council. At regional level, a business case is in development for a regional climate change risk assessment under the Edinburgh and East of Scotland City Region Deal's Shared Prosperity Framework.
 - 4.8.5 Works are progressing to deliver active travel improvements in the city, and construction of the new segregated cycleways of the City Centre West to East Link connecting Roseburn to Leith Walk started in February 2022. Construction

for the West Edinburgh Link project is due to start in 2023, and for the Meadows to George Street project in 2024.

- 4.8.6 The city centre Low Emission Zone was introduced in May 2022, with enforcement due to start on June 2024, following a two-year grace period.
 - 4.8.7 The Tram to Newhaven lines are about to go live, with passenger services due to begin in the start of 2023.
 - 4.8.8 The expansion of the public on-street electric vehicle charging network has continued with 81 new chargers installed this summer, including 41 rapid and fast chargers at on-street locations with the remainder provided at Hermiston and Ingliston Park and Ride sites.
 - 4.8.9 A Communal Bin Review (CBR) project is underway, with Phase 1 in the final stages of completion (Road works for installation of metal fences and roll out of new/refurbished bins in the first geographical area – around Leith).
 - 4.8.10 A decision to progress development of a Workplace Parking Levy (WPL) business case and undertake initial stakeholder engagement was made by the Committee in November 2022.
 - 4.8.11 The Council has supported the development of the Edinburgh Community Climate Forum and Business for Good programme to support businesses to transition.
 - 4.8.12 Seven new signatories have joined the Climate Compact, committing to take action within their own organisation to contribute to a green recovery and radically reduce the city's carbon emissions.
 - 4.8.13 The development of an Infrastructure Investment Programme Board (IIPB), with supporting delivery partnerships to drive collaboration across the city
 - 4.8.14 The Council has started the roll out of the Carbon Literacy training across the organisation, with 156 colleagues having received the accreditation as of October 2022. The Head of Human Resources also attended the Climate Solutions training from the Royal Scottish Geographical Society and the Council Leader was also successfully selected to participate in the UK100's Climate Leadership Academy in Autumn 2022. Officers will continue to provide opportunities for elected members to receive carbon literacy training, either internally or through the Improvement Service.
 - 4.8.15 The Net Zero Communities programme is progressing, and an update will be provided to Committee in the start of 2023.
- 4.9 As a result of this activity in the round, Edinburgh has continued to receive recognition as a city at the forefront of climate action:
- 4.9.1 Edinburgh is one of just 95 cities world-wide to be placed on the 2021 A List by CDP (only city in Scotland) – an international charity which runs the world's largest environmental disclosure system for companies and cities. This recognition means Edinburgh is seen as a city that is taking bold leadership on

environmental action and transparency. The evaluation of Edinburgh's 2022 submission is not available at the time of writing.

- 4.9.2 Edinburgh has been ranked among the top three councils in the UK in 2022 by the Council Climate Plan Scorecard project for the quality of our Climate Strategy
- 4.9.3 Edinburgh features on the top 100 Sustainable Cities Index (16th place)¹
- 4.9.4 Edinburgh has been awarded silver status by the Sustainable Food Places Network in 2022, in recognition of the city's pioneering work to promote healthy and sustainable food.
- 4.9.5 For three years in succession, 2020, 2021 and 2022, Edinburgh has been awarded with the maximum of six badges from the Global Covenant of Mayors (GCoM)² initiative, recognising its climate mitigation and adaptation efforts. Edinburgh is one of 8 fully compliant local authorities in the UK (out of 63 UK LA who are GCoM members), and the only fully compliant local authority in Scotland (out of 10 who are GCoM members).

Accelerating partnership action and collaboration

- 4.10 Over the past year, the City of Edinburgh Council has led on the establishment of Edinburgh's Infrastructure and Investment Programme Board (IIPB), set up to oversee implementation of Edinburgh's 2030 Climate Strategy and support collaborative development of strategic city infrastructure in line with Edinburgh's 2030 net zero target.
- 4.11 The Board, whose governance is aligned and accountable to the Edinburgh Partnership Board:
 - 4.11.1 Provides city wide leadership in creating a green, clean, and sustainable future for the city
 - 4.11.2 Oversees, agrees, and drives delivery of five thematic workstreams (Adaptation; Energy Efficient Public Buildings; Heat and Energy; Transport Infrastructure and Just Economic Transition) which in turn are responsible for developing a pipeline of green infrastructure projects for the city.
 - 4.11.3 Develop a green infrastructure investment plan for the city.
- 4.12 The Council's Executive Director of Place chair's the board and core partner organisations include public sector organisations in the city with significant control over public buildings and homes (NHS, the City of Edinburgh Council, Edinburgh universities and colleges), the private sector utility companies investing significantly in the infrastructure of the city (SP Energy Networks, Scottish Gas Network, Scottish Water), as well as the Edinburgh Chamber for Commerce representing business, employment and economic interests. The role and remit of the IIPB and the Partnerships are provided in more detail in Appendix 1.

¹ [Report](#) by consulting company Arcadis

² <https://www.globalcovenantofmayors.org/>

- 4.13 The IIPB has already undertaken extensive combined citywide data analysis mapping including:
- 4.13.1 heat and energy demand and supply
 - 4.13.2 buildings and land ownership and investments
 - 4.13.3 relevant transport infrastructure
 - 4.13.4 areas vulnerable to climate change, and
 - 4.13.5 wider socioeconomic spatial data.
- 4.14 This data has been interrogated to place level to identify local areas where collaborative infrastructure planning will yield the greatest opportunity and support the scale of transition required by net zero. The Board has commissioned work to deliver:
- 4.14.1 A single combined (partner shared evidence base) data map to underpin organisational operation and financial planning.
 - 4.14.2 A first opportunity appraisal at place level with a view to progressing deeper data analysis and targeted feasibility work at more 'places'. This includes identification of project pipelines, project readiness and a feasibility assessment of collaborative opportunities and options.

Support for communities and business

- 4.15 The Council has continued to engage with citizens through the co-development of the Edinburgh Community Climate Forum's work programme which the Council sponsors. The Forum works with local networks, community groups, voluntary and third sector organisations. The Forum aims to help empower communities to lead on transitioning their communities to Net Zero. It is doing this by:
- 4.15.1 supporting community capacity to deliver transformational change;
 - 4.15.2 supporting community leadership and inclusion in climate planning and action,
 - 4.15.3 facilitating catalyst projects between communities and organisations
 - 4.15.4 encouraging transformative change and working with communities to embed Community Wealth Building in local climate actions.
- 4.16 The Council has also supported the development of Everyone's Edinburgh and their Business for Good programme. The programme delivers advice, support, and encouragement to Edinburgh businesses seeking to take climate action. During 2022 the programme has developed new [online resources](#) and guidance for businesses of all sizes, including toolkits, access to online courses, one to one guidance, as well as online masterclasses for business leaders.

Resources and cost pressures for Edinburgh 2030 Climate Strategy

- 4.17 The Council has experienced a decrease in resource in the corporate sustainability team as previously highlighted to the Committee. A number of posts were fixed term with 12 month funding that cannot go beyond the end of the financial year. These

two factors combined have meant that it has not been possible to fill fixed term team vacancies. At the same time, critical delivery teams in the organisation are also under capacity pressure with key skill gaps such as in energy. As part of its plans to deliver the Council Business Plan, the Council will need to consider the nature and amount of resources that are now needed to support the net zero agenda and how the Council can be competitive in respect of the skills it needs in the current market.

- 4.18 At the same time, the Council is facing long-term financial pressures, a lack of certainty and flexibility over funding. Other challenges include the increasing costs of building retrofit and shortages in the supply chain and signalling from both the UK and Scottish Government that there will be reduced targeted investment to support councils to deliver on net zero ambitions.
- 4.19 In this context, it is essential that the Council is very clear on areas of greatest priority within the climate strategy, although the ambition to work across the whole implementation plan remains.

Prioritisation for the Edinburgh 2030 Climate Strategy

- 4.20 In order to make sure Council resources are focused on the most impactful actions needed to reduce city emissions and ensure future resilience to climate change, a number of actions have been identified as priorities for delivery over the next two years. These are actions:
- 4.20.1 needed to address the largest sources of climate emissions,
 - 4.20.2 where investment is expected to have the greatest impact, and
 - 4.20.3 where the Council can exert direct influence or control.
- 4.21 Using this approach, it is proposed that Council priority actions should focus on
- 4.21.1 the decarbonisation of transport; active and public transport;
 - 4.21.2 climate change adaptation;
 - 4.21.3 improving the energy efficiency of public buildings and
 - 4.21.4 the delivery of enabling infrastructure needed for a 'net zero' city.
- 4.22 These priorities and what actions may be undertaken to deliver against them are covered in more details in the draft Council Business Plan also under consideration by this Committee. Decisions relating to these priorities and their supporting actions will be taken by full council as part of the Council Business Plan. Ongoing delivery of the wider implementation delivery plan for the 2030 Climate Strategy will be progressed as resources allow.

Edinburgh Climate Commission update

- 4.23 The Council would like to acknowledge and thank members of the Edinburgh Climate Commission for their work to date, and in particular the support from the Commission's chair Sam Gardner and commissioner Clare Foster who led the Climate Compact activity.

- 4.24 The Independent Climate Commission was established jointly by the Council and ECCI and despite launching just as the world went into lockdown and a global pandemic has made a significant and positive impact on the city's ambition to be net zero. In particular, the Commission, through their collaboration, challenge, and support, improved the 2030 Climate Strategy which has been independently evaluated as best in Scotland and ranked third in the UK.
- 4.25 The Commission meets three times per annum, with 8 full Commission meetings held to date, complete minutes of which are published on its website.
- 4.26 Since its inception, the Commission has produced three major reports:
- 4.26.1 A Net Zero Carbon Roadmap for Edinburgh (Dec. 2020), providing evidence for the development of the Climate Strategy
 - 4.26.2 Forward, Faster, Together (July 2020), providing recommendations for a Green Economic Recovery in Edinburgh
 - 4.26.3 Commission feedback on the City of Edinburgh strategy (Sept. 2021), a response to the draft 2030 Climate Strategy.
- 4.27 In 2021 the Commission developed and launched The Edinburgh Climate Compact, securing commitment by leading businesses and employers in Edinburgh to take action within their own organisation to contribute to a green recovery and radically reduce the city's carbon emissions. Since its launch, signatories to the compact has grown to reach 25 organisations who meet quarterly to share knowledge, expertise and to promote good practice to the wider business community.
- 4.28 In addition to these actions, current work underway by the Commission includes:
- 4.28.1 Convening a programme of work on a place-based approach to net zero opportunities and skills development. The programme aims to help facilitate a co-ordinated approach to planning for and investing in a workforce with the skills needed to accelerate the city's transition to net zero, and position Edinburgh as a Just Transition leader, and
 - 4.28.2 Undertaking research into policy enablers and barriers to place based climate action in Scotland. Working with the Scottish Cities Alliance, this work aims to understanding the limitations of existing powers and governance arrangements in Scotland, which is linked to the ability of Scottish local authorities to progress net zero, identify areas where change is needed, and to develop recommendations for improvement.
- 4.29 PCAN, who provided supporting funding for the Commission are now conducting a review of a number of city commissions in order to establish what might be needed to continue to support Commissions to have impact into the future.
- 4.30 As such, and given that the Chair and several volunteer Commissioners will now step down from the commission having served 3 years in a voluntary capacity, the Commission has taken the decision to take this opportunity to consider and refresh its role, remit and membership. This also allows the Commission to reflect the

changed context in Edinburgh following the establishment of the IIPB and its supporting partnerships.

- 4.31 At this juncture, and reflecting the resourcing pressures in the Council, Council capacity will be targeted towards the delivery partnerships while PCAN continues to support the Commission. The Council will remain a signatory of the compact and a supportive collaborator of the Commission in its next phase of activity. In this vein the Council is participating and presenting at a planned Climate Compact Event called 'raising our game' which is planned for January 2023.

5. Next Steps

- 5.1 The priorities for climate action will be reflected in the refreshed Council Business Plan, subject to Member debate and approval at full council. These will represent the priority outputs for the delivery of the Edinburgh 2030 Climate Strategy over the next two years. Work will continue on wider delivery commitments as resources allow.
- 5.2 To conclude the statutory consultation of the 2030 Climate Strategy a Post Adoption Statement will be prepared and published at the end of 2022. This will capture consultation comments, final monitoring framework, and identify how the SEA process improved the Strategy

6. Financial impact

- 6.1 This report seeks to take account of the resources pressures facing the Council.
- 6.2 The costs associated with the development of the SEA are being met by the Council Budget 2022/23 set aside for the delivery of the strategy.

7. Stakeholder/Community Impact

- 7.1 The consultation was carried out in line with the Council's consultation policy and the proposal was submitted through the Consultation Advisory Panel to check robustness and quality.
- 7.2 Communications for this consultation focussed directly on the relevant organisations and community organisations involved in sustainability discussions in the past. It was also open to members of the public for comment. However, taking into account there were no substantial changes since the previous consultation at the end of 2021, and in order to avoid over consultation/consultation fatigue, the public were not directly targeted to promote the consultation.
- 7.3 An Integrated Impact Assessment has been undertaken on the 2030 Climate Strategy. Further IIAs will be commissioned as appropriate as key strategic actions are taken forward.

8. Background reading/external references

- 8.1 [Strategic Environmental Assessment guidance](#), Scottish Government, June 2022.

- 8.2 [2030 Climate Strategy](#), City of Edinburgh Council, October 2021
- 8.3 [2030 Climate Strategy – Draft for Consultation](#), City of Edinburgh Council, June 2021
- 8.4 [2030 Climate Strategy – consultation and engagement](#), City of Edinburgh Council, August 2021
- 8.5 [2030 Climate Strategy and Implementation Plan](#), City of Edinburgh Council, November 2021

9. Appendices

- 9.1 Appendix 1 – IIPB role and remit
- 9.2 Appendix 2 - Consultation Responses on the Climate Strategy SEA Environmental Report
- 9.3 Appendix 3 – Recommendations for the Climate Strategy Implementation Plan

Appendix 1 – IIPB Role and remit

Edinburgh Partnership Board

Climate Strategy Infrastructure Investment Programme Board

Chair: City of Edinburgh Council (Paul Laurence); City of Edinburgh Council (Gareth Barwell).

Secretariat: City of Edinburgh Council

Scope: Align and Agree a Green Investment Plan for Edinburgh; oversee and drive delivery of the thematic partnerships

City Heat and Energy Partnership

Chair: SP Energy Networks (Stuart Walker; Vice-Chair: CEC (David Cooper).

Secretariat: SP Energy Networks

Draft Role and Remit

To develop a whole-system strategic approach to meeting the city's current and future energy needs, in ways which reduce the city's emissions from energy to net zero by 2030.

To support place-based approaches to local energy generation which help build community wealth; delivering a city heat energy map.

To test, develop and scale innovative approaches to funding which help unlock private sector investment; and support inclusive growth, workforce development and employment opportunities for the just transition to a low carbon economy.

To deliver a Heat and Energy Masterplan (including an EV demand and heat map for city); an Edinburgh Villages masterplans.

To develop an Energy project pipeline of projects and mapping that shows current and planned investments.

To conduct an options appraisal assessment on new delivery models.

Energy Efficient Public Buildings Partnership

Chair: Edinburgh University (Grant Ferguson)

Secretariat: Edinburgh University

Draft Role and Remit

To develop a map of large public building retrofit needs and plans and collaborate on aligning investment and developing new financial models for resourcing building and estate transformation.

To share learning from feasibility studies and pilot retrofit projects, to inform model development and cost analysis for both joint retrofit projects and individual city partner plans.

To complete an analysis of large building retrofit needs across the city. This will include an assessment of opportunities for place-based approaches/collaboration on buildings retrofit and adaptation of estate grounds.

To develop a joint city public estate retrofit plan and project pipeline that shows current and planned investments.

Just Economic Transition Forum

Chair: Edinburgh Chamber of Commerce (Liz McAreavey)

Secretariat: Edinburgh Chamber of Commerce

Draft Role and Remit

To coordinate city private sector leadership on net zero and support for a just transition including fair work.

To share knowledge and expertise on net zero and just transition activity across the private and third sector including; the climate compact; business for good; circular economy

To promote private and third sector contribution to net zero and just transition activity in Edinburgh

To collaborate with the other themed partnerships on heat and energy generation, building retrofit, transport investment and adaptation

To develop a map of private sector supply chain opportunities and skills needs..

Transport Infrastructure Partnership

Chair: City of Edinburgh Council (Daisy Narayanan).

Secretariat: City of Edinburgh Council

Draft Role and Remit

To provide city wide collective leadership on delivery of the city mobility plan and support the outcomes of the city plan 2030.

To develop shared outcomes for and collaborate on an integrated multimodal transport network plans for the city.

To share knowledge, innovation, data and coordinate organisational investment plans as far as possible.

To develop a pipeline of investment for public transport decarbonisation, including active travel infrastructure developments; public transport improvements; business fleet and freight routes; and EV infrastructure.

Adaptation Partnership

Tbc.

Secretariat: tbc

Draft Role and Remit

To provide city wide leadership in adapting Edinburgh to the impacts of unavoidable climate change.

To collaborate with wider city partnerships and City Region Deal partners to develop regional approaches.

To develop a costed climate change risk assessment for the city, identifying current and future risks to the city's built and natural environment.

To develop a new city adaptation plan to address current and future risks from climate change and create a climate resilient Edinburgh.

To develop a pipeline of adaptation investment proposals, supported by business cases for mitigating future costs by preventing climate impact damage.

Appendix 2 - Consultation Responses on the Climate Strategy SEA Environmental Report

Section	Comment	CEC Response
Scottish Environment Protection Agency (SEPA)		
General	In large part, we are content that the SEA issues we previously highlighted have been adequately addressed. Please see Summary below for details of where we consider our advice has been taken and areas where we consider work is needed for the ER and to inform the Climate Strategy.	Noted
Summary	We have focussed our comments on the draft ER in four subject areas. Energy and Air Quality relate to the reduction of the causes of climate change and the achievement of Net Zero Emissions. Flood Risk and The Water Vision/Strategic Water Management relate to the need to adapt to inevitable climate change. In addition, we are pleased to see that comments made at a later meeting about “sifting” have been taken into account: We asked the consultants to ensure that there is a clear overarching document showing that items that were not taken forward in the ER, following a sifting exercise, are being covered by other PPS (City Plan, City Mobility Plan, etc.). This is to ensure that this SEA can point people in the right direction for implementing actions and ensuring nothing is forgotten. Appendix D found on CEC Consultation hub – Strategic Actions Sifting Exercise – shows exactly that, even pointing at the page number of those PPS.	Noted
	The ER states: “The Strategy is focused on putting in place actions that can be implemented now, using approaches that will work and drawing from lessons learned and experience from other cities. As discussed at the meeting following the scoping exercise, we consider the post adoption statement may be the most appropriate place to highlight these actions	Noted. Consideration will be given to the prioritisation and delivery of these actions within the Post Adoption Statement.
Energy	We consider that our advice in our scoping response has been included and we agree with the conclusion of the draft ER that the strategy will have a significant, positive, cumulative impact.	Noted
Air Quality	Our advice on amending the SEA to assess air quality effects has been taken forward by CEC and its consultants. We agree with the conclusion in the draft ER that overall, a significant, positive, cumulative effect on air quality is expected from the Strategy.	Noted
Flood Risk	We have reviewed the draft ER in relation to the advice given from SEPA in the previous consultation (PERMS 5254, SH Ref: SEA01724, 10th June 2022). We consider that some of the recommendations we have made have now been incorporated in the updated SEA Environmental Report, whereas several others have not been captured	Noted – see response to detailed comments below

	or omitted. It is for Jacobs and CEC to determine the risks and benefits associated with not including the advice provided by SEPA.	
	In relation to PERMS 5254, we raised under 'Adaptation', Section 2.5 that updates to SEPA pluvial flood maps are currently underway and the flood map outputs (including climate change impacts are anticipated to be available in the next 18 months. This project is ongoing and SEPA/JBA have provided updates to CEC regarding timescales for each milestone prior to delivery of the maps. We note the SEA has not identified these updated pluvial flood maps are future additions for understanding baseline flood risk	Noted. Reference to the updated pluvial flood maps will be included within the Post Adoption Statement monitoring approach to ensure that these are considered in future monitoring.
	Similarly, in relation to Section 2.6, we note there has been no reference to future updates on the next iteration of coastal flood hazard maps for South-East Scotland (including Edinburgh) which are due to be progressed in the earlier part of the next 6-year cycle.	Noted. Reference to the updated coastal flood maps will be included within the Post Adoption Statement monitoring approach to ensure that these are considered in future monitoring.
	We acknowledge that 'surface water management plans' will be considered and incorporated in the SEA in line with our advice	Noted
	We previously raised (Section 3.20, PERMS 5254) SEPA's recently published Climate Change Allowances (Version 2: https://www.sepa.org.uk/media/594168/climate-change-guidance.pdf) which provides updated rainfall and flow uplifts based on the Future Drainage Project and the CEH 2020 Study. Contrary to our advice we note this guidance source has not been referred to in the current SEA to reflect the latest developments in climate change science, particularly for application to the Forth River Basin Region which is most relevant to Edinburgh.	Noted. Reference to this guidance note will be included with the Post Adoption Statement with an 'Updates to the Environmental Report' section.
	Similarly, as requested in Section 3.21 (PERMS 5254), we note that no reference to the updated Dynamic Coast 2 dataset has been included in the current ER report contrary to our advice. Based on the draft National Planning Framework 4, we note that coastal erosion will also be an important consideration for existing and future development siting, so this is a further reason to ensure the SEA refers to all available datasets	Noted. Reference to the updated coastal flood maps will be included within the Post Adoption Statement monitoring approach to ensure that these are considered in future monitoring.
	We are pleased that the statement regarding flood risk avoidance pertaining to all flood sources, not just surface water risk, has been reflected in the latest iteration of the ER report.	Noted
	The ER report has not referenced the Edinburgh and Lothian Strategic Drainage Partnership (as requested in PERMS 5254, Section 3.23) which we consider to be a key partnership that could help to deliver some of the objectives from the 2030 Climate Strategy and linkages should be considered.	Noted. Reference to this guidance note will be included with the Post Adoption Statement with an 'Updates to the Environmental Report' section.

<p>The Water Vision/Strategic Water Management</p>	<p>As indicated at point 8 in Flood Risk, we would emphasise what we consider as the need for the Climate Strategy to align more explicitly with CEC's Water Vision and all work streams flowing from it including work on Green Blue Infrastructure. One means of doing that might be amendments to the section on Water on pages 9 and 10.</p> <p>One means of doing that might be amendments to the section on Water on pages 9 and 10.</p> <p>A minor positive effect on the water objective is expected from the climate resilient development Strategic Action Area.</p> <p>A number of the Strategic Actions are aimed at developing a long-term approach to water management.</p> <p>Through SEPA's and SW's engagement with CEC departments and interaction under the Edinburgh and Lothians Strategic Drainage Partnership, aligning with the Adaptation partnership and Infrastructure Investment Board, wider private public and finance and community partners we are working to deliver the City's Water Vision. In doing so, CEC is working to embed future fitting water resilience as part of place led design & retrofit in such a way that measures also contribute to social and economic capital.</p> <p>It is recognised that weather extremes are likely to become much more frequent. Implementing interconnected Blue Green Infrastructure, at all scales, across the city will not only improve water management reduce the risk of flooding and support resilience in times of drought. It will also enhance the water quality, amenity value and accessibility of Edinburgh's water bodies.</p> <p>Collaborating with green finance experts to support the resourcing and delivery of major city climate projects, beginning with the city Water Vision would have an indirect positive impact on the water objective, by improving water quality and reducing flood risk. These interactions can also be tied to business incentivisation schemes, bolstering private business interaction and learning.</p> <p>An alignment of water resilience action to wider climate resilience and place led objectives will support the development of project pipelines with associated narrative, attractive to private investors. All of this interaction has potential to support new Natural Capital markets and a new innovative job market.</p> <p>A neutral effect on the water objective is expected from energy generation and energy efficient buildings, emission transport, and investing in change Strategic Action Area.</p> <p>There was no clear relationship or negligible relationship between the water objective and the other Strategic Action Areas.</p>	<p>Noted. Rather than amend the text within the Environmental Report we will include text within the Post Adoption Statement monitoring approach to highlight the important of the integration in the delivery of the Climate Strategy and CEC Water Vision to ensure holistic approach to development and enhancement of green blue infrastructure.</p>
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NatureScot		
	<p>We are content with the assessment, which has taken on board many of our comments made at SEA scoping stage, and which was also discussed at a recent meeting with the consultants and the consultation bodies.</p> <p>We note that strategic actions which have been assessed by SEAs of other plans and strategies have not been included within the main assessment of this SEA.</p> <p>However, the ER appears to be missing the appendices which would further clarify this sift. That aside, we have no specific comments to make on the assessment.</p>	<p>Noted. Appendices were provided on the CEC consultation hub at 2030 Climate Strategy - Draft Strategic Environmental Assessment - City of Edinburgh Council - Citizen Space. The sift is clarified in Appendix D.</p>
	<p>It is also noted that due to the nature of the strategy, there will be no negative impacts and therefore no mitigation required to address such impacts. The assessment has therefore taken the opportunity to list some enhancement recommendations that could feedback into the strategy and its implementation plan (Table 5.1).</p> <p>We welcome these positive recommendations which help to focus the detail and practicalities of taking forward the strategy and environmental enhancements, for example, in how nature based solutions can be used to help infrastructure adapt, and detail of biodiversity enhancements, tree planting etc.</p>	<p>Noted</p>
Historic Environment Scotland (HES)		
Environmental Report	<p>We are content to agree with the findings of the Environment Assessment and have no detailed comments to offer.</p>	<p>Noted</p>
Edinburgh World Heritage		
Maladaptation	<p>The negative impacts of maladaptation on Cultural Heritage and Landscape and Townscape due to inappropriate climate change adaptation and mitigation interventions should be more specifically mentioned in the Environmental report.</p> <p>This could affect historic buildings, public realm/green spaces and the historic urban and natural setting across the city and, in particular, the Old and New Towns of Edinburgh World Heritage and Conservation Areas.</p>	<p>Noted. At this Strategic level impact on the historic environment was considered neutral as the SEA didn't have sufficient detail to assess a specific approach to adaptation or consider where proposals could be considered 'maladaptation'.</p> <p>Further assessment will be undertaken as adaptation/retrofit proposals are taken forward.</p> <p>Recommendations were included in the Environmental Report that seek to ensure that 'maladaptation is avoided'</p> <p><i>Include commitment to ensure a collaborative</i></p>

		<p><i>approach with World Heritage and Historic Environment Scotland when developing an approach to retrofit properties located in conservation areas or listed buildings.</i></p> <p><i>Include general, high-level reference to cultural heritage resources in the city at risk of climate impacts, describing how they are vulnerable (e.g. parks and gardens, historic buildings, archaeological resources) and how they will be protected.</i></p>
City Views	<p>Regarding Cultural Heritage and Landscape and Townscape:</p> <p>a) the Old and New Towns of Edinburgh World Heritage Site's skyline and setting are vulnerable to unsympathetic development – including cumulative (negative) impacts resulting from inappropriate incremental changes. The city's topography and visual characteristics (landmarks, townscape characteristics) create a uniquely visible landscape setting for the city. A majority of key views from the 'Skyline Study' cut across the World Heritage Site; their protection is essential to the protection of the historic environment. Key views should also be monitored and included in the SEA baseline environmental conditions..</p>	<p>Noted. Reference will be added to the Post Adoption Statement to ensure consideration of the Skyline Study in the monitoring of key views as part of the ongoing monitoring approach.</p>
	<p>b) it is important to consider, quantify and monitor traditional buildings - built before 1919 and made of traditional materials – whether they are listed or not as they contribute to the character of an area - in the Old and New Town of Edinburgh World Heritage Site, in Conservation Areas but also across the city.</p>	<p>At this strategic level a recommendation was included in the Environmental Report that stated <i>Include general, high-level reference to cultural heritage resources in the city at risk of climate impacts, describing how they are vulnerable (e.g. parks and gardens, historic buildings, archaeological resources) and how they will be protected.</i></p>
Consultation responses from the public related to the SEA Environmental Report		
Strategic Alternatives	<p>Due to the climate emergency reasonable alternatives are not explored and are therefore not presented to people for comparison purposes.</p>	<p>The rationale for the approach to the consideration of alternatives was presented in section 3.7 of the Environmental Report</p>

		and agreed with the Statutory Authorities.
Simplified Version of the Report	Request a simplified version as the Environmental Report is considered a very technical document	A Non-Technical Summary was provided as part of the Environmental Report. The forthcoming Post Adoption Statement will also provide a less technical summary of the purpose of the SEA and how the SEA influenced the Strategy.

Appendix 3 - Enhancement Recommendations for the Climate Strategy Implementation Plan

Enhancement Recommendations for Implementation Plan	Relevant SEA Topic	CEC response
Net zero, climate resilient development and growth		
Develop an outline business case for a programme of building assessments, beginning with buildings in areas identified for future joint retrofit investment.	Climatic factors	Recommendation accepted. The Council and the Energy Efficiency and Public Buildings partnership has a robust programme of work to map building archetypes and technical solutions. In the Council this is being taken forward through the Green Growth Accelerator Programme and the Partnership board is looking for opportunities for future joint investment.
Clarify the members of the city's climate adaptation partnerships referred to in the outcome 'Renewing the focus on climate resilience and accelerating the adaptation of the city'.	All topics	Recommendation accepted. Membership of the Edinburgh Adapts partnership and will be added to the implementation plan. The council has worked with partners to refresh the Edinburgh Adapts partnership, appointing a new chair from Scottish Water who will ensure connectivity with wider flood risk activity and widened the membership of the partnership. Additional members of the partnership will be considered on an ongoing basis and as areas of work are identified Other adaptation partnerships include the Multi-Agency Risk Group established by the Lothian and Borders Local Resilience Partnership, and the Edinburgh and Lothians Strategic Drainage Partnership, comprising the Council, SEPA and Scottish Water.
Include actions that show ongoing collaboration between sectors and neighbouring councils to reduce GHG emissions.	Climatic Factors, Air Quality, Biodiversity, Water	Recommendation accepted. The Council collaborates with neighbouring Councils through the Edinburgh and South East City Region Deal and the regional growth framework with prioritisation being given to transport, energy and adaptation at a regional level. The Edinburgh and Lothians Strategic drainage partnership is another example of regional collaboration on water management.
Include commitment to ensure a collaborative approach with World Heritage and Historic Environment Scotland when developing an approach to retrofit properties located in conservation areas or listed buildings.	Cultural Heritage, Material Assets	Recommendation accepted. Collaborative working has and is being done in relation to adaptation as EWH and HES have been long term members of Edinburgh Adapts
Include actions that show ongoing collaboration with national and international organisations to share best practice on GHG emissions reduction, climate adaptation and nature-based solutions.	All topics	Recommendation accepted. The implementation plan includes the following actions to share best practice: <ul style="list-style-type: none"> a. Nationally <ul style="list-style-type: none"> 3.1 "Share learning from public sector partners approaches to improving energy efficiency in public sector new build operational estate with the new Energy Efficient Public Buildings Partnership" 1.1 "Share learning from the Edinburgh CST programme to support capacity building across Scotland's cities and local authorities" b. Internationally The Council will continue to report to CDP, sharing climate action progress transparently.
Include wider description of how the city's infrastructure will be resilient to specific climate impacts,	Climatic Factors	Recommendation accepted. This will be included in the Climate Ready Edinburgh Plan.

including specific reference to changes in temperature extremes, flooding, high winds and storminess.		
Include actions that describe how land management practices on council-owned land will be adapted to enable increased carbon sequestration and biodiversity enhancement (e.g. type of land cover, vegetation cutting regimes).	Biodiversity, Climatic Factors	Recommendation accepted. This will be included in the Climate Ready Edinburgh Plan.
Add annual milestone targets in relation to tree planting for the Million Tree City Initiative. In addition to target numbers, this should also consider, for example, referring to areas of the city where tree planting could be most effective for amenity value, pollutant removal, cooling and shading.	Population and Human Health, Biodiversity	Recommendation accepted. This will be covered by the action plan for the Million Tree City programme which has been drafted. It is under review by the Million Tree City board and to be shared with the forum. The current annual target (as reported to Committee in April 2022) is 25,000 trees planted per year. However, this target may likely change after the planned i-tree eco survey next year. This will have consideration of the impact of ash dieback and other diseases on tree losses over coming years.
Include general, high-level reference to cultural heritage resources in the city at risk of climate impacts, describing how they are vulnerable (e.g. parks and gardens, historic buildings, archaeological resources) and how they will be protected.	Cultural Heritage	Recommendation accepted. Page 10 of the strategy states "Increased flooding, coastal erosion and more severe weather will disrupt business, including the city's cultural events, and cause damage to homes and the city's public and commercial buildings, including Edinburgh's UNESCO World Heritage Site." The implementation plan includes the following action to protect heritage resources: 4.3 "Adapt Edinburgh's World Heritage Site to be resilient to the impacts of climate change" The Climate Change Risk and Vulnerability Assessment being undertaken by the Council and Atkins will describe in more details how heritage resources are vulnerable, and the Climate Ready Edinburgh plan will describe how these will be protected.
Add milestone targets in relation to reducing flood risk to the population. These should be informed by and linked to the Water Management Vision and Strategy, Strategic Flood Risk Assessment, and other relevant flood risk management plans. The targets should include reference to the specific locations of population most at risk and areas of deprivation.	Water	Recommendation accepted. Submission of bids for consultancy fees for Green Finance options studies to be completed by summer 2022.
Add milestone targets in relation to SUDS installation and the efficacy of new and existing SUDS for surface water management. Monitoring of their biodiversity and amenity value should also be considered.		Noted. This is linked to the flood studies being undertaken as SUDs is one part of the solution. Target setting is dependent on funding being secured.
Consider public education campaigns and demonstrator projects to show the benefits of SUDS techniques (e.g. green roofs, rainwater harvesting) for private homes.		Noted. The Edinburgh and Lothians Strategic drainage partnership has a Community Plan and part of that plan is public education but demonstrator projects are not possible without funding resources.
Include commitment to reduce water demand on the public sector estate and through working with		Noted.

the general public, private sector and Scottish Water.		
Include general reference to the use of Green blue infrastructure or nature-based solutions to be explored and used to help infrastructure adapt to climate change	Biodiversity, Water, Land use, Climatic Factors	Recommendation accepted. Green blue infrastructure is being used to help address climate change adaptation in the Green blue neighbourhood plan work for the three water sensitive catchments in the city. These three catchments have been identified by the Council and Scottish Water as the top priority for work.
Net zero emission transport		
Include actions for city partners to use their procurement and purchasing power to support reductions in emissions from freight and shipping.	Climatic Factors, Water, Air Quality	Recommendation accepted. The Council's Commercial and Procurement services can influence transport emissions at the planning stage (using the Scottish Government's Sustainable Procurement Tools); by making specific requirements in the contract specifications (e.g. reduced deliveries, vehicle type/age, bearing in mind we can't discriminate between providers coming from outwith the UK); by including carbon reduction measures in the award criteria; and by adding specific clauses in the contract conditions. Action 6.3 in the Implementation Plan includes specific actions to tackle supply chain emissions. As a member of the national Climate and Procurement Forum and the Edinburgh Climate Compact, the Council can influence key stakeholders to drive reductions in emissions from freight and shipping.
Supporting a more circular economy and reducing waste		
Develop an outline business case for new circular economy projects in Edinburgh, including appropriate output and outcome targets.	Material Assets	Noted. The Council is committed to collaboration with partners such as the Chamber of Commerce and Zero Waste Scotland on circular economy project subject to available resources.
Consider what milestone targets would be appropriate to help achieve the CEC target of all new investment and purchase decisions being net zero by 2030.	Material Assets	Recommendation accepted. CEC will work with the Just Economic Transition partnership to undertake a workshop with city procurement leads from different organisations to maximise best practice and consider milestones to get to 2030. The council is also already a member of the national Climate and Procurement Forum looking at these issues.
Add milestones to increase the number of businesses participating in the Circular Edinburgh programme across each of the implementation plan delivery phases.	Material Assets	Noted. The Council is committed to collaboration with partners such as the Chamber of Commerce and Zero Waste Scotland on circular economy project subject to available resources.
Add reference to the need to consider carbon emissions at construction, operational and maintenance project stages and consider life cycle analysis for materials and technologies in relation to public sector procurement.	Air Quality, Climatic Factors, Material Assets	Recommendation accepted. The implementation plan includes the following action : "1.2 Subject to support for legislative change, review local planning guidance to encourage net zero climate resilient development decisions (including higher density/mix of use sites), including using whole life carbon scenario assessments when replacing existing buildings. / Engage with developers to support the application of existing guidance and best practice for assessing whole of life costs and emissions impacts of planned developments" "3.4 Building on the construction methodology pilot, carry out further research into approaches to delivering whole-life net zero developments across primary, operational and embodied emissions" The Council's Sustainable Procurement Strategy includes the following action "Increasing whole-life

		costing approach to evaluation criteria and learn from others through best-practice forums”
General		
Ensure implementation plan actions and milestone are clearly attributed to the new city partnerships established to drive delivery of the Strategy priorities	All topics	The Council does not have the power authorities to set milestones for city partners, but we continue to collaborate through the IIPB and its partnerships infrastructure to drive delivery of the strategy priorities. The current Climate Strategy Implementation Plan goes as far as possible to attribute actions and milestones as negotiated with city partners.