

Directorate for the Built Environment

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Mrs. V.C.K. Metcalfe
Community Councillor
Avich & Kilchrenan Community Council



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Dear Mrs Metcalfe

FREEDOM OF INFORMATION REQUEST

Thank you for your further email of 02 April, regarding the Environmental Report for Scotland's Renewable Energy Routemap and Electricity Generation Policy Statement.

I note your point about 'qualitative assessments of greenhouse gases and fuel savings' and having to identify the most up to date information on which to base decisions. However, I should point out in terms of satisfying the requirements of Directive 2001/42/EC, which is implemented in Scotland by the Environmental Assessment (Scotland) Act 2005, public bodies are not required to generate new baseline data where none already exists, when developing new plans and programmes.

The Directive recognises most public organisations do not have the means to undertake the collection of baseline data. Hence the EC guidance for the Directive refers to 'include the information that may reasonably be required'. This allows organisations, such as the Scottish Government to identify and utilise published environmental information that is already available. It also supports the fact the Directive requires public bodies to identify the 'likely' environmental effects of implementing a plan or programme.

The sources of environmental information relating to greenhouse gases and fuel savings for the Routemap and Policy Statement, are referenced within the Environmental Report and linked for the reader to access the source material.

In terms of the judgement of 'significant' in relation to environmental benefits of low carbon energy sources, it is clear from the assessment that there are a number of caveats to this statement setting the context for significant effects to occur. Furthermore as you can note, the Environmental Report within Chapter 3, considers the environmental issues relating to the potential sources of energy production. However, the statement of significant for renewable sources is based on the environmental information that is available and the likely effects of the route map and policy statement, if implement and is therefore is a qualified statement for the purposes of Strategic Environmental Assessment.



It is further qualified by the fact that as Scotland moves to a low carbon economy all contributions to an overall reduction in carbon production can be viewed as a significant positive contribution. As with most national public plans and programmes, legal challenge is a reality. However, a meaningful consultation process allowing those who could be affected or who may have an interest, to have their opinion taken into account, is just one means to reduce the risk of challenge.

The consultation process is therefore an important part of the preparation and assessment process for the Routemap and Policy Statement and I would hope you view this as an opportunity to have your opinion taken into account.

Yours sincerely

William Carlin
SEA Gateway Manager