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Dear Mr Majeed

**Environmental Assessment (Scotland) Act 2005  
Aberdeen City Council: Open Space Strategy  
Scoping Report**

Thank you for consulting Historic Scotland on the scoping report prepared for the environmental assessment of Aberdeen City Council's Open Space Strategy which was received in the Scottish Government's SEA Gateway on 29 December 2010. I have reviewed the Scoping Report on behalf of Historic Scotland in its role as a Consultation Authority under Section 15 of the above Act. This letter contains our views on the scope and level of detail of the information to be included in the Environmental Report (part 1) and the duration of the proposed consultation period (part 2).

**1. Scope of assessment and level of detail**

- 1.1 My understanding from the scoping report is that the strategy is being prepared to provide a framework for the protection, creation, connection and improvement of open spaces throughout Aberdeen city. I note that this will comprise a number of strategic objectives and related actions including those which aim to encourage people to enjoy and access open spaces.
- 1.2 I note that the historic environment is scoped in to the assessment. In our screening response we agreed that there are likely to be some effects for the historic environment as a result of managing access to designated sites located within open spaces and the opportunity to promote understanding and enjoyment of the historic environment, but that we did not consider these effects would be significant. This view was based on the actions that might come forward and the framework that exists for the protection and management of the historic environment. I note from the scoping report that you have already drafted objectives and actions for the open space strategy. Based on these I still

consider that the strategy is unlikely to result in significant effects for the historic environment. However you may have further information which is informing your view and as such, subject to my specific comments in the Annex to this letter, I am content with the scope and level of detail proposed for the assessment.

## **2. Consultation period for the Environmental Report**

2.1 I am content with the period of 6 weeks proposed for the consultation on the Open Space Strategy and Environmental Report. For administrative purposes, Historic Scotland consider that the consultation period commences on receipt of the relevant documents by the SEA Secretariat.

None of the comments contained in this letter should be construed as constituting a legal interpretation of the requirements of the SEA Act. They are intended rather as helpful advice, as part of Historic Scotland's commitment to capacity-building in SEA. Please contact me should you wish to discuss this response.

Yours sincerely



**Hannah Garrow**  
Senior Development Assessment (SEA) Officer

## **Annex: Detailed comments on the Scoping Report**

For ease of reference the comments in this annex follow the same order as the Scoping Report.

### **Description of the content of Aberdeen City Open Space Strategy**

1. I note that you have included a draft of the objectives and actions which will be in the open space strategy. The role of SEA should be to influence the content of the strategy to ensure, where possible, the best environmental outcome. In this respect it will be interesting to see if and how the objectives and actions change as a result of the assessment.

### **Relationship to other plans and policies**

2. I welcome that you have identified national plans, programmes and strategies relevant to the preparation of the statement. I am pleased to see you have included reference to the consolidated Scottish Planning Policy (SPP) and our own Scottish Historic Environment Policy (SHEP) in the review. You should note however that the SHEP was consolidated into one document in October 2008 and has since been updated to include policies for historic battlefields. The most recent version is available on our website. In the ER you should focus the review on the key environmental messages for the historic environment emerging from these documents which you consider are of relevance to the preparation of the Open Space Strategy.

### **Baseline**

3. Simply for information Historic Scotland has recently published [Scotland's Historic Environment Audit 2010 \(SHEA\)](#) which contains information about baseline trends in the historic environment and should be a useful resource in identifying relevant environmental problems.

### **Scoping in/out of SEA Issues**

4. I note that the historic environment is scoped in to the assessment. As noted above while I agree that there is the potential for actions to impact locally on the historic environment, given the nature of the actions that are likely to come forward and the framework that exists for the protection and management of the historic environment I do not think that these effects are likely to be strategically significant. As such I would be content for the historic environment to be scoped out of the assessment. However you may have further information which is informing your view e.g. you may wish to use the open space strategy to identify land for development or designation as open space/recreation. It might have been useful in this respect if Table 5.1 were to include some commentary to explain why certain topics are scoped in/out.

### **Framework for assessing environmental effects**

5. I note that a matrix approach is proposed for the assessment. I welcome the inclusion of a column in the matrix for additional comments.

6. It may also help to focus or guide your assessment were you to consider including some criteria for each of the environmental topics. This could be achieved through the development of SEA objectives and accompanying questions. For example an appropriate objective for the historic environment would be to *'protect and where appropriate enhance the historic environment'* and the constituent questions to ask yourself when carrying out the assessment might include:

- Will the objective/action impact on any scheduled monument and/or its setting?
- Will the objective/action affect any locally important archaeological site?
- Will the objective/action impact on any listed building and/or its setting?
- Will the objective/action affect a Conservation Area?
- Will the objective/action affect a Garden or Designed landscape?