

Our Ref: PCS111590
SG Ref: SEA00513/sco

M. Aftab Majeed
Enterprise Planning & Infrastructure
9th Floor
St. Nicolas House
Broad Street
Aberdeen City Council
Aberdeen
AB10 1 BW

28 January 2011

By email: sea.gateway@scotland.gsi.gov.uk

Dear Mr Majeed

**Environmental Assessment (Scotland) Act 2005
Aberdeen City Council Open Space Strategy – Scoping consultation**

Thank you for your Scoping consultation submitted under the above Act in respect of the above Strategy. This was received by SEPA via the Scottish Government SEA Gateway on 24 December 2010. As required under Section 15(2) of the Act, we have considered the document submitted and comment is attached in respect of the scope and level of detail to be included in the Environmental Report (ER).

The Scottish SEA Toolkit (available for download at: www.scotland.gov.uk/Publications/2006/09/13104943/0) provides guidance to Responsible Authorities about the type of information that is expected to be provided at each SEA stage. We have used the toolkit to inform this scoping response which is attached as Annex 1.

On completion, the Environmental Report and the Strategy to which it relates should be submitted to the Scottish Government SEA Gateway (sea.gateway@scotland.gsi.gov.uk) which will forward it to the Consultation Authorities.

Should you wish to discuss this consultation, please do not hesitate to contact me on 01349 860359 or via SEPA's SEA Gateway at sea.gateway@sepa.org.uk.

Yours sincerely

Susan Haslam
Senior Planning Officer (SEA)
Planning Service

Enc

Chairman
David Sigsworth

Chief Executive
Dr Campbell Gemmell

SEPA Corporate Office
Erskine Court, Castle Business Park, Stirling
FK9 4TR
tel 01786 457700 fax 01786 446885
www.sepa.org.uk

Annex 1: Comments on the Scoping Report

General comments

The scoping report provides clear and detailed information on the proposed scope and level of detail of the assessment. As we do not consider it likely that the Strategy will have strategically significant effects on the environmental receptors we have an interest in we have limited detailed comments to make on the proposals but those which we have are outlined below.

Detailed comments

For ease of reference the following comments are provided in the same order as the scoping report.

1. Environmental problems

- 1.1 We consider that the environmental problems described generally highlight potential issues of relevance for the SEA topics within our remit. However, we would suggest that issues relating to open space, such as recreation, probably do not contribute significantly to these problems.

2. Alternatives

- 2.1 We understand that the Strategy will be compared with a "do optimum" alternative. We would encourage you to record the alternative strategic directions, policies or proposals that are being considered as part of the strategy-making process.

3. Scoping in/out of SEA Objectives

- 3.1 We suggested at the screening stage that the Strategy was not likely to have significant strategic effects in respect of our main areas of interest (human health, soil water, air and climatic factors).
- 3.2 We note that it is still proposed to scope human health, soil and water into the assessment. Based on the information provided in the scoping report, consideration of the criteria detailed in Schedule 2 of the Act and due to the area covered by the Strategy we still consider that it is likely that the Strategy will not have strategically significant effects on these environmental receptors. However, we appreciate that you have a much better understanding of the developing Strategy than we do and generally welcome your conservative approach.

4. Methodology for assessing environmental effects

- 4.1 Please note that we generally expect all aspects of the Strategy which could have significant effects to be assessed.
- 4.2 Guidance on assessment techniques and developing assessment methods can be found in Chapter 9 of the Scottish Government SEA Toolkit. We would recommend that enough information and justification is provided in the ER to allow the Consultation Authorities to understand how the results of the assessment were reached.

- 4.3 The aforementioned new website www.seaguidance.org.uk includes advice and guidance on how to take air, soil and water into account in SEA.

5. Mitigation

- 5.1 One of the most important ways to mitigate significant environmental effects identified through the assessment is to make changes to the Strategy itself so that significant effects are avoided. The ER should therefore identify any changes made to the Strategy as a result of the environmental assessment.
- 5.2 Where the mitigation proposed does not relate to modifications to the Plan itself then Table 5.6 looks like a clear way to record how the mitigation will be achieved and by whom.

6. Monitoring

- 6.1 Although not specifically required at this stage, we would welcome the early consideration of monitoring requirements to be included in the ER. Wherever possible and appropriate, existing monitoring frameworks and indicators can be used effectively to meet the SEA monitoring requirements.

7. Next steps

- 7.1 We are satisfied with the proposal for a six week consultation period for the ER.