



By email to: [REDACTED]

Tom Walsh
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Strategic Development Planning Authority
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Our ref: SDP/1
Our case ID: 300020587
Your ref: 01239 Environmental Report
18 May 2018

Dear Mr Walsh

[Environmental Assessment \(Scotland\) Act 2005](#)
[Aberdeen City & Shire - Strategic Development Plan](#)
[Main Issues Report and Interim Environmental Report](#)

Thank you for your consultation which we received on 04 April 2018 about the above and its Environmental Report (ER). We have reviewed these documents in relation to our main area of interest for the historic environment. The first part of this response relates to the Main Issues Report, with part two focusing upon its environmental assessment.

Part 1: Main Issues Report

We welcome the opportunity we have had to comment on the emerging Main Issues Report in its drafting. We can therefore confirm that we are content with the preferred options put forward in the report and welcome the re-focusing of the vision. We also note that the spatial strategy will largely be a continuation of the existing approach from the adopted Strategic Development Plan.

Part 2: Environmental Report

We welcome the preparation of this environmental report and would offer the following comments on a number of areas of the assessment.

Scoping

We note the analysis of our scoping response and welcome that our comments have largely been addressed in the Interim environmental report.



Table 3.2 SE [REDACTED]

It is unclear from this table as to whether or not there is an intention to consult on the updated ER alongside the Proposed Plan. Should the Proposed Plan contain new proposals/policies/objectives etc that have not been assessed in the current MIR environmental report then we would advise that the [REDACTED] should [REDACTED]

MIR Options and Alternatives

We are content to agree with the approach to options and alternatives outlined in this section.

Assessments – General Comments

The assessment has been carried out at a high-level with the commentary supplied reflecting this. As a general point regarding the findings of the assessments it is unclear from the justifications provided as to whether the differences between the preferred and alternative options are of the magnitude to merit the move from potential significant negative to ascribing non-significant negative effects. Furthermore, it is unclear whether these scorings are reported pre or post mitigation.

We note that the mitigation column of the assessment tables relating to the various components of the MIR have not been populated. We would advise that this be addressed as part of the updated environmental report. Sections of the commentary supplied for these assessments discuss issues that are relevant in this regard (such as “Developments could be designed in such a way to enhance historic features and setting”). The summary mitigation measures contained in Table 6.1 cover this area to an extent but the completion of the mitigation for each individual assessment would aid in setting out what is required to mitigate the identified effects for each element of the SDP.

Assessment of Spatial Strategy

As noted above, we would question whether the change of assessment finding from significant to non-significant is merited in this case. The reasoning supplied of the “proposed allocation is adding in hundreds rather than thousands and should be more positive for the environment” still constitutes additional development to the existing baseline.

Monitoring

As a point of clarification, the Buildings at Risk Register is now maintained by Historic Environment Scotland as opposed to the Scottish Civic Trust.



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None of the c [REDACTED] this letter constitute a legal interpretation of the requirements of the Environmental Assessment (Scotland) Act 2005. They are intended rather as helpful advice, as part of our commitment to capacity building in SEA.

We hope this is helpful. Please contact us if you have any [REDACTED] response. The officer managing this case is [REDACTED] by [REDACTED]

Yours sincerely

Historic Environment Scotland