

Heart of Neolithic Orkney World Heritage Site Management Plan 2008–13

Consultation Report

Historic Scotland

October 2008

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1. Introduction

1.1 *Background to the consultation*

- 1.1.1 A consultative draft of the Heart of Neolithic Orkney World Heritage Site Management Plan 2008–13 was issued for public consultation on 8 May 2008 for a period of six weeks. It is available at: www.historic-scotland.gov.uk/index/about/consultations/orkney-management-plan-consultation. It invited views on how the Partners – Historic Scotland, Orkney Islands Council (OIC), Scottish Natural Heritage (SNH) and the Royal Society for the Protection of Birds (RSPB) – propose to manage the Site over the next five years. It also set out the Partners' vision and long-term aims over the next thirty years and evaluated how the Site has been managed since it was inscribed on the World Heritage List in 1999.
- 1.1.2 A 'strategic environmental assessment' (SEA) was undertaken on the Management Plan to meet the requirements of the Environmental Assessment (Scotland) Act 2005. The findings of the environmental assessment were set out in the Environmental Report that accompanied the draft Plan as an appendix.
- 1.1.3 The consultation closed on 19 June and a public meeting was held on 7 June. 17 written responses were received and these are available at: www.historic-scotland.gov.uk/index/about/consultations/consultation-responses-orkney. Hard copies can be consulted at the Scottish Government Library, Y Spur, Saughton House, Broomhouse Drive, Edinburgh, EH11 3XD. To request copies by post, enquire about photocopying charges or make an appointment to view responses, telephone 0131 244 4556 or email SGLibrary@scotland.gsi.gov.uk.
- 1.1.4 An Analysis Report which compares the number of participants with the distribution list, summarises the written responses and public meeting discussion, analyses the views expressed, and identifies the key issues raised is available at: www.historic-scotland.gov.uk/index/about/consultations/closed-consultations.

1.2 *Report objectives*

- 1.2.1 This report outlines what has been taken forward into the final Management Plan and why. It sets out the substantive changes to the consultative draft made in the light of the consultation responses, public meeting discussion and any other relevant information. Factual errors that were raised have been corrected. The final Plan is available from: www.historic-scotland.gov.uk/index/learning/freepublications.htm. Hard copies may be requested from the Heart of Neolithic Orkney World Heritage Site Co-ordinator at Historic Scotland, Longmore House, Salisbury Place, Edinburgh, EH9 1SH or hs.orkneywhs@scotland.gsi.gov.uk.
- 1.2.2 This report also sets out the information required for the post adoption stage in the SEA process. It explains how the findings of the environmental assessment have informed the finalised plan, how the opinions expressed on the environmental assessment have been taken into account, and identifies the measures proposed to monitor the environmental effects of the Management Plan.
- 1.2.3 This report therefore incorporates the statutory requirements of section 18 of the Environmental Assessment (Scotland) Act 2005 and, for clarity, the following table identifies where the information required at the post adoption stage is included in the report:

Table 1: SEA Post Adoption Statement

Information required by the SEA Act	Section
How environmental considerations have been integrated into the plan	2.3
How the environmental report has been taken into account	2.3
How the opinions expressed during the consultation period have been taken into account	2.2 and Annex A
Transboundary consultations	There were no transboundary consultations as the plan will not affect other EU Member States.
Reasons for adopting the finalised plan	3.1
Monitoring	3.2

1.2.4 Copies of this report can be downloaded from www.historic-scotland.gov.uk/index/about/consultations/closed-consultations. Printouts may be requested from the Heart of Neolithic Orkney World Heritage Site Co-ordinator at Historic Scotland, Longmore House, Salisbury Place, Edinburgh, EH9 1SH or hs.orkneywhs@scotland.gsi.gov.uk.

1.3 The consultation methods

1.3.1 The Analysis Report sets out in detail the formal consultation process in Section 2. To summarise, the Management Plan and accompanying Environmental Report were issued for public consultation on 8 May for six weeks. The consultation documents were available to download from the Historic Scotland website or to consult in hard copy at six locations in Orkney. Respondents were encouraged to use a response form which set out the 18 consultation questions with spaces for comments under each one. The consultation exercise was widely advertised in the media and on posters. Verbal feedback formed part of the consultation with a public meeting on 7 June at the end of Week 4 of the consultation and a pre-consultation meeting on 28 February. Two meetings with local councillors were also scheduled at the same time. The analysis of the responses and public meeting comments identified gaps in terms of the lack of response from specific interest groups and the main issues that had been raised.

1.3.2 The SEA process involved a number of stages prior to the publication of the Environmental Report which required formal consultation with the Consultation Authorities (SNH and the Scottish Environment Protection Agency (SEPA)). In February 2008 we sought their views on whether the Management Plan was likely to have significant environmental effects. Both SNH and SEPA responded to our screening consultation agreeing that significant environmental effects were likely. In March 2008 they were consulted on the proposed scope and level of detail of the environmental assessment. SNH were in agreement with our suggested approach and provided some detailed comments. SEPA were largely in agreement and considered that we should include an assessment of flooding issues within the SEA, and also provided more detailed comments. Annex A of the Environmental Report explains how those comments were taken into account in the environmental assessment.

1.3.3 After the formal consultation periods of the draft Management Plan and OIC's draft Supplementary Guidance on Onshore Wind Energy closed, Historic Scotland and OIC exchanged responses which related to the World Heritage Site Buffer Zone proposals and met to discuss the way forward. Historic Scotland and OIC also met

with representatives of Orkney Energy Renewable Forum (OERF). Meetings were also arranged with the NFU (National Farmers' Union) Scotland, VisitOrkney and the Orkney Tourism Group. In each of these cases discussion focused on the areas of the draft Plan most relevant to their interests.

1.4 Summary of views and other information

- 1.4.1 Section 4 of the Analysis Report outlines the opinions expressed during the formal consultation period under each consultation question. These views are summarised in Section 5.2 of that report.
- 1.4.2 Most respondents were generally supportive of the overall aims of the Plan. Some felt that providing public benefit should have been an explicit Issue for the next five years. Many comments focussed on the perceived impact of revised World Heritage Site Buffer Zones on wind energy development which they felt would restrict such development over an unreasonably large area. A few participants thought that the Setting of the World Heritage Site had been affected by visitor facilities and that this type of development was of greater impact than wind turbines some distance from the Site.
- 1.4.3 Most of the respondents who commented on the Environmental Report thought that the SEA had been conducted appropriately. However, others thought that socio-economic and climatic impacts of the Plan and World Heritage Site status should have been assessed given the perceived impact of revised Buffer Zones on wind energy development.
- 1.4.4 Consultation with OERF focused on how views it expressed in writing during the formal consultation could be taken into account in the final Plan. OERF expressed concern related to the methodology used to define areas to control development around the World Heritage Site.
- 1.4.5 NFU Scotland noted that successful tourism in Orkney was dependent on good stewardship through agriculture and it would welcome increased interaction between the Partners and the agricultural community related to World Heritage Site management.
- 1.4.6 VisitOrkney and the Orkney Tourism Group agreed that the World Heritage Site was of great value to the tourism sector in Orkney. They were also supportive of the specific objectives relating to access, the range of values listed in the draft Plan and initiatives such as the revised grass-cutting regime at Brodgar and the Maeshowe twilight tours.

2. How have views and information been taken into account?

2.1 Introduction

- 2.1.1 This section identifies the key issues raised and explains how they have been taken into account. In this, the issues are those which called for substantial changes or additions to the Plan. Views in support of the draft are summarised in the Analysis Report and do not form part of this section.
- 2.1.2 The 'main issues' section below incorporates both the comments provided on the draft Management Plan and on the Environmental Report as many of the consultees raised very similar issues. Greater detail on how environmental considerations and the recommendations of the Environmental Report have been taken into account is also provided.

2.2 Main issues

Issue 1: Buffer Zone and constraints on wind energy development

- 2.2.1 The consultative draft proposed two layers of Buffer Zone. Firstly, two local Buffer Zones designed to manage small-scale change in the local area around the World Heritage Site and, secondly, a large Buffer Zone to manage large-scale change which may affect the Setting of the World Heritage Site. Points raised in consultation were that Buffer Zones were not an appropriate way to control development in Mainland Orkney as the existing 'Buffer Zone' (the Zone of Visual Influence in the Local Plan) had been ineffectual; or that the rationale behind the local Buffer Zones was reasonable but that the large Buffer Zone would impact on Orkney in terms of socio-economic disbenefits by preventing wind energy development within that zone.
- 2.2.2 The nature of these responses suggest that the purpose of World Heritage Site Buffer Zones was unclear in the draft Plan. Buffer Zones do not create areas which have blanket restrictions placed upon them. They are tools to help guide developers and decision-makers about where development *might* have an impact on the Setting of particular World Heritage Sites and thus where such impacts need to be carefully assessed. This has been explained in more detail in the final Plan.
- 2.2.3 The Atkins Ltd report which accompanied the draft Plan made recommendations to the Partners on if and whether Buffer Zones could help protect the Setting of the World Heritage Site. The report has also been revised to make its scope and recommendations clearer. Atkins Ltd's recommendation for a single Buffer Zone to manage small-scale change in the local area and an indicative 'Sensitive Area' to help manage large-scale change, more particularly wind energy development, has been adopted in the final Management Plan as the preferred way forward. The Management Plan is a non-statutory document which sets out how the Site will be managed over the next five years such as the conservation of monuments, and access and education provision. In order to make a clearer distinction between the aims and objectives of the Plan and the Setting Report, they have been published as standalone documents. The revised Setting Report is available from: www.historic-scotland.gov.uk/index/learning/freepublications.htm.
- 2.2.4 Atkins Ltd recommended that the Sensitive Area be used in Onshore Wind Energy Supplementary Guidance and that planning policy should also be supported by a dedicated World Heritage Site Supplementary Guidance document. It is for the local authority to consider these recommendations in formulating Guidance and reviewing the Orkney Local Development Plan.

- 2.2.5 This issue was also raised in comments to the Environmental Report where a number of respondents considered that the economic and climatic effects of limiting wind energy development through Buffer Zones should have been included in the environmental assessment. This issue was not addressed in the environmental assessment because it is not considered to be an impact of the Management Plan. As outlined above, the purpose of the Management Plan is to protect and manage the World Heritage Site. Development is managed by the Orkney Islands Development Plan and the associated planning policy produced by OIC.

Issue 2: Demonstrating public benefit

- 2.2.6 Some respondents felt that the Plan did not fully demonstrate the public value or benefits of World Heritage Site status in terms of sustaining the local economy. These comments predominantly related to the perceived additional constraints on development which would be brought about by revised Buffer Zones.
- 2.2.7 World Heritage Site status is a recognition of the international significance to present and future generations of cultural and natural sites. In 1999 the World Heritage Committee decided that the Heart of Neolithic Orkney was of outstanding universal value, of sufficient authenticity and integrity, and could be managed to sustain these qualities. The purpose of a World Heritage Site Management Plan is to demonstrate how the Site is being protected and preserved under the terms of the UNESCO World Heritage Convention which includes adopting “a general policy which aims to give the cultural and natural heritage a function in the life of the community”. An overarching aim of both the 2001 and 2008 Management Plans is to deliver and promote public benefits. In response to consultation comments, the public benefits of the Orkney World Heritage Site have been emphasised in the final Plan.
- 2.2.8 This issue was also raised in comments on the Environmental Report where a number of respondents considered that the impacts of World Heritage Site status on the economy and local community should have been included in the environmental assessment. This issue was not considered to be within the scope of the SEA, which is focussed on the environmental issues that are identified in the Environmental Assessment (Scotland) Act 2005. Additionally, a number of the environmental issues included in the Act were not considered to be significantly affected by the Management Plan at the scoping stage of the SEA process, and so were not included in the assessment.

Issue 3: Engaging with stakeholders

- 2.2.9 Some respondents felt that certain stakeholder views, in particular from Business & Enterprise, had not been considered given the perceived additional constraints of redefined Buffer Zones. It was also felt by some that there had been a lack of community involvement in the Management Plan review process.
- 2.2.10 The composition of the World Heritage Site Management Board was queried and so this has been made more explicit in Chapter 3 of the final Plan. The Board is composed of organisations who have a direct locus in managing the Site and facilitating access to it. Other than the four main Partners other stakeholder organisations are represented on sub-groups. At the public meetings attendees said that they would appreciate more opportunities to talk face-to-face with representatives of the Partners. The role of stakeholders in implementing and monitoring the Plan objectives has been added to the final Plan in the Objectives document.

2.2.11 Chapter 1 of the draft Plan on the consultation process has been redrafted into the final Plan Preface. Greater detail on the steps taken to engage the community in the Management Plan review can be found in Section 2.5 of the Analysis Report and the consultation methods used are explained in Section 1.3 of this report. Two public meetings (Stakeholder Forums) were held before and during the formal consultation period and the review was widely publicised. About 40 people attended the February meeting and 26 people attended the June meeting. The local community were represented in greater numbers at the first meeting. In response to consultation comments, Objective 37 of the final Plan has been reworded to emphasis two-way communication with the local community and stakeholders to stimulate involvement and share information.

Issue 4: Impact of visitor facilities

2.2.12 Views were expressed that existing visitor facilities, limited access to parts of the Site, and excessive visitor numbers at peak times detracted from the visitor experience and that the facilities themselves had had an adverse impact on the Setting of the monuments.

2.2.13 Historic Scotland is obliged to provide appropriate public access to the World Heritage Site which is cared for by it on behalf of Scottish Ministers and the people of Scotland. The other Partners also have public access remits. Visitor requirements must be balanced with minimising the impact of facilities on the World Heritage Site and other cultural and natural heritage sites. This aim has been made explicit in Objectives 25–27 and 30 of the final Plan and is central to the long-term aims in Chapter 5. The impact of recent facilities will be evaluated, as indicated under Aim 15 of the Evaluation of the 2001 Plan (Chapter 4). Ideas expressed during consultation about providing occasional supervised access for the local community to areas of the Site normally closed to the public will be considered and facilitated wherever possible.

2.3 *Integrating environmental considerations into the plan and taking account of the environmental assessment*

2.3.1 In addition to the key issues identified above, there were a number of more detailed comments provided on the Environmental Report (e.g. suggestions for mitigation measures and monitoring indicators) that have been taken into account in finalising the Management Plan. These detailed comments are provided in Annex A of this report.

2.3.2 One of the key aims of the SEA process is to influence and inform the finalised version of the plan by integrating environmental considerations into the plan and taking account of the environmental assessment. This has been achieved in the following ways:

- the nature and purpose of the Management Plan is environmental in terms of its overarching vision to protect, conserve and enhance the World Heritage Site
- the vision, aims and objectives of the Management Plan were developed in close consultation with the Partners (OIC, SNH and RSPB) and incorporate wider environmental interests (e.g. biodiversity interests are included in Objective 14, carbon footprint and environmental sustainability issues are included in Objective 45)
- the draft aims were amended following the environmental assessment to incorporate the recommendations made during the assessment. In particular, an

- the Plan's objectives will be monitored annually to establish progress made, and an objective that solely relates to the SEA was added to the plan to help establish a link between the plan and the SEA. Progress towards meeting Objective 46 "ensure that the results of the strategic environmental assessment are taken forward as the objectives are delivered" will be considered as part of the annual review of the objectives
- a number of the draft objectives were considered to have uncertain, or potentially negative environmental effects depending upon more detailed matters that will be established as the plan is implemented. Detailed mitigation measures were proposed for these objectives to help manage this uncertainty. A clear link with the SEA is made in the finalised Management Plan by including a column in the objectives and monitoring indicators table in the Objectives document that indicates which objectives will need further environmental assessment (a red triangle symbol is used). This can be cross-referenced to the Schedule of Commitments which identifies the mitigation measures in detail.

3. Conclusions

3.1 Introduction

- 3.1.1 This section states why the Management Plan is considered to have adequately considered environmental effects under SEA, outlines the process to monitor and review the Management Plan, and describes the environmental mitigation and monitoring that will be followed.
- 3.1.2 The Environmental Assessment (Scotland) Act 2005 requires that information is provided to explain the reasons for choosing the finalised plan in light of other reasonable alternatives. As noted in the Environmental Report, we did not assess strategic alternatives i.e. the ‘no plan’ option or strategic options for the overall direction of the plan, as these are largely prescribed by the UNESCO guidance and are not considered to be reasonable alternatives. The Management Plan has been prepared in consultation with the Partners and the vision, aims, issues and objectives have been refined through this process. We considered alternative wordings for the vision, aims and objectives, and the environmental assessment has helped to inform the final version of the plan through making amendments to the draft objectives and incorporating particular objectives related to the SEA.
- 3.1.3 The majority of the objectives included in the Management Plan are considered to have positive or neutral environmental effects. A few of the objectives could have negative environmental effects, however, the scale and nature of any environmental effects is uncertain at this stage and will depend upon the implementation of the objectives. Detailed mitigation measures have been developed to manage this uncertainty and ensure that further environmental assessment is integrated into the implementation of the Management Plan. Overall, we consider that the Management Plan fulfils its purpose by providing a clear framework to manage the World Heritage Site, and incorporates wider environmental issues as far as possible.

3.2 Next Steps

- 3.2.1 The final Management Plan and revised Setting Report will be submitted to UNESCO. The objectives of the Management Plan will be continually monitored and a Monitoring Report will be published each year on Historic Scotland’s website. Co-ordination between the Partners and two-way communication with stakeholders are high priorities to ensure that the Plan is implemented and that the values of the Heart of Neolithic Orkney World Heritage Site are conserved, enhanced and promoted. The Management Plan is next due for review in 2012–13.

Environmental mitigation

- 3.2.2 As noted in paragraph 3.1.3, further environmental assessment will be required for some of the Management Plan’s objectives as they are implemented. Table 2 describes the detailed mitigation measures that will be taken forward during the lifetime of the plan:

Table 2: Schedule of commitments

Objective	Mitigation commitment
8	Develop proposals to alter the World Heritage Site boundary in consultation with partners and undertake public consultation
13, 18, 25	Manage visitor numbers to avoid exacerbating problems at sensitive sites
8, 10, 11	Consider the implications of the predicted effects of climate change for the

	management of the World Heritage Site
8, 24, 25, 26, 27, 30	Integrate environmental assessment into the development of options for any new visitor facilities and car parks. Include consideration of sustainable urban drainage systems for any new developments
10	Include section on environmental risk in the Risk Strategy
11	Undertake Environmental Impact Assessment for proposals to address coastal erosion at Skara Brae and seek early involvement of partners and SEPA
12	Include environmental interests in Conservation Strategies
13	Consider environmental sustainability issues when addressing carrying capacity problems
18, 19, 22, 34, 44	Proposals for archaeological research to consider possible environmental effects of the proposed work
18, 19, 22, 34	Grant funding from Historic Scotland to incorporate environmental criteria into the evaluation of funding proposals
23	Include environmental sustainability questions in the programme of visitor studies
24	Include wider environmental issues in the Interpretation Plan
25, 26, 30	Integrate environmental sustainability principles into the review of public access to the World Heritage Site
15, 16, 38	Improve general awareness of biodiversity duty
45	Determine the environmental measures that will be required to reduce our carbon footprint. Audit current baseline and describe measures that are already being undertaken to prioritise key areas for action. Links made with the Green Tourist Business Scheme and Historic Scotland's Environmental Management Scheme

Environmental monitoring

3.2.3 The final stage of the SEA process is to monitor the environmental effects of the Management Plan. Each of the objectives included in the Management Plan has an associated indicator and target that will be used to measure progress. An annual monitoring report will be prepared to describe the progress made towards meeting the objectives. A number of these indicators are relevant to monitoring the environmental effects of the plan and these are listed below:

- effects of visitor erosion managed
- biodiversity maintained or improved
- condition of monuments maintained or improved
- principle of minimal intervention applied to archaeological investigations
- increased use of sustainable forms of transport, sustainable sources used wherever possible, running of sites carried out in a sustainable manner

3.2.4 We also intend to report on the delivery of the schedule of commitments, and propose the following indicators, which are associated with Objective 46 in the Management Plan:

- environmental assessment undertaken during the development of options to address coastal erosion at Skara Brae
- environmental assessment undertaken for all new developments, including revised car parking arrangements

Annex A: Detailed opinions expressed on the Environmental Report and how they have been taken into account

Question 14 Do you have any comments on the baseline information, or the environmental problems/issues?	
Opinion expressed	Response
1 suggested further information that should be considered in the Atkins report (Individual)	Information incorporated into Atkins report
2 provided factual comments on the baseline information (Public Body and Individual)	Information noted
1 agreed that the ER identified the relevant baseline and issues (Public Body)	Noted
1 queried the relevance of baseline information on population and human health (Individual)	Baseline information was gathered for all of the environmental topics scoped in to the assessment. We accept that some of the information on population and human health may not be directly relevant but it is intended to provide contextual information
Question 15 Do you have any comments on the approach taken for the environmental assessment?	
Opinion expressed	Response
1 suggested that the assessment lacked focus and that key issues were diluted (Individual)	Noted
1 suggested that the effects of visitor transport and access on climate change should be considered (Individual)	At the scoping stage we explained that we do not consider that the Management Plan will have a significant effect on climate change in terms of emission of greenhouse gases. The plan is unlikely to affect the mode of transport chosen by visitors to come to Orkney (i.e. aeroplane versus ferry), however, it may be able to influence the form of transport used to visit the sites (e.g. through controlled ticketing, parking arrangements and footpaths). However, we do not consider that this will have a significant effect on climate change in the context of the strategic environmental assessment
3 agreed with the scope of the assessment (Public Bodies)	Noted

1 suggested more detail on the ongoing assessment would have been useful (Public Body)	Noted, this will be provided for future SEAs
Question 16 Do you agree with the results of the environmental assessment? Have we identified the key issues?	
Opinion expressed	Response
1 suggested that the effects of access on the historic environment resource should be highlighted (Individual)	Agreed. This is included in the mitigation commitments
1 suggested that the protection of landscape is important (Individual)	Agreed. This is included in the mitigation commitments
2 agreed with the results of the assessment (Public bodies)	Noted
Question 17 Do you have any comments on the environmental mitigation measures, including the schedule of commitments?	
Opinion expressed	Response
1 suggested that mitigation should include support of and use of renewables (Individual)	Noted. Where possible, in the future management of the World Heritage Site sustainable principles will be applied to energy and site management. This is reflected in Objective 45 of the Management Plan
3 agreed with the proposed mitigation measures (1 Individual, 2 Public Bodies)	Noted
Question 18 Do you have any comments on the proposed additional environmental monitoring indicators?	
Opinion expressed	Response
1 suggested monitoring energy consumption at World Heritage Site visitor centres (Individual)	Agreed that this would be a useful indicator which could be incorporated into achieving Objective 45 related to reducing carbon footprint
1 agreed with the proposed monitoring programme (Public Body)	Noted