

15/6/08

Historic Scotland
Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Dear Sir,

Reference: Heart of Neolithic Orkney World Heritage Site Management Plan consultation.

Thank you for the opportunity to comment on the management plan. As a resident of Orkney, and someone who is building our home within sight of the Maeshow and the Ring of Brogdar I have particular interest in this consultation.

Before going into detail I would like to express my concern at the extent of the buffer zone being proposed. I consider the proposals put forward in the Atkins report to be excessive and do not balance the needs of sustainability. In my opinion the woolly language used in the Atkins report and the sweeping assumptions as to what is acceptable in the vicinity of the WHS are poor foundations upon which to build the management plan.

I am pleased, however, to note that much of the action plan is founded on better ground and is more focussed. The targets and aims appear largely sustainable and worthy of Historic Scotland's adoption. I expect the management plan, when refocused, will command the necessary support sought by UNESCO.

Context: The recent event run in Orkney by OIC clearly set the backdrop against which this action plan needs to be set. A backdrop where there will be significant extinction, population displacement (human, animal and plant) caused by increased temperatures and increasing reliance upon renewable energy and a lower overall energy use.

The regular references to sustainability in the document are therefore welcomed. There is some concern, however, about whether the import of this has been thoroughly grasped. The references to preservation within the document are therefore a concern as there will be some features within the landscape that will be incapable of preservation. E.g. there will be continuing changes to the flora and fauna surrounding the WHS, there will either be a

loss of Skara Brae to the sea, or a change in the setting in Skail bay through coast protection works.

It is widely realised that the changes that will occur need to be managed and where there is a choice in the matter of change then sustainable solutions should be sought. It will not be possible, however, for business as usual.

Answers to Specific Questions:

1. Comment on the current buffer zone:

The existing buffer zone is adequate for the ring of Brogdar, but is excessive for Skara Brae. Given the Atkins assessment of the nature of the experience (Section 6) then it is inappropriate to sterilise all land to the ridgeline from further development.

2. Comment on the proposed buffer zones:

I believe the extent of the zone is entirely inappropriate. It has been sized based on a false presumption that wind turbines are incompatible with the WHS. This can clearly not be the case because the wind turbines on Burgar Hill pre-date the WHS designation. If the two were incompatible the WHS designation would not have been granted.

The perpetuation of this silly idea is unworthy of an organisation such as HS and should be retracted immediately.

Furthermore the assumption that wind turbines will be 150m high is also incorrect and skews the exercise. This unsupported assumption gave rise to the Atkins Figure 11 which then appears to have been incorrectly translated into Figure 13 for the buffer zone. (Fig 11 coloured edges are limited by the ridgeline, but Fig 13 extends to the shore around Evie etc.). This flawed Fig 13 has then in turn been taken incorrectly by OIC into its SPG (OIC has no planning jurisdiction over Skail Bay below HWS).

It is the misuse of the notional 150m structure, the assumption that no part of a new feature can be accommodated or be visible, the misuse of the data and the mis-translation that forms the core of my opposition to the buffer zone being proposed.

The zone seeks to impose development restrictions to seaward and also inland in an inappropriate manner.

Overall; relying upon the apparently superficial Atkins report undermines the entire management plan. It appears that HS are seeking dominion over the West Mainland of Orkney despite this being outwith their remit.

3. Comments on other values of the WHS. Is anything missing?

I am partly pleased to see that there is recognition in 3.3.2.6 that the primary benefit of the WHS to the local economy is related to tourism. Given the numerous studies that have show that tourists are not put off by wind turbines

and indeed the majority see them as interesting features, there should be no presumption against them on tourism economic grounds.

The landscape already supports evidence of continuous experimentation by the farmers of Orkney. The landscape is indeed hard worked (3.3.3.2) and diversification within farming has been continuous. One of the latest crops being attempted is electricity either from bio-digesters or wind. Stifling such diversification is not HS remit and imposing policies that damage the nation's ability to achieve sustainable development would be contrary to HS' commitment¹ to work within Scotland's sustainable development strategy².

Section 2.8 commits Scotland to making sure it:

- *is maximising the potential of our renewable energy sources*
- *has a vibrant, low-carbon economy*
- *provides a quality environment for all.*

The management plan as drafted appears to heavy-handedly work against these national objectives for new endeavours. Fortunately the management plan does not propose the removal of other agricultural practices introduced since the Neolithic. It is therefore necessary to accommodate further appropriate development, not prevent it.

Clearly there are all manner of agricultural change that are moderated by scale and distance. A blanket ban on anything new within sight of the WHS is clearly unenforceable and more thought needs to be given to the risks associated with blanket bans being applied. Formal recognition of this is necessary in the Management Plan and is, in my opinion, inadequate at present.

4. Stakeholder list.

The bulleted list is slightly misleading in that Tourism has already been identified elsewhere as the economic benefit of the WHS. As such I am unclear as to why Tourism is treated differently from 'Business & Agriculture'. I would suggest that these either need to be three items, or one. It is also not clear as to how wide the attendance of this group is presently or intended to be.

The reference in the Aim 5 (Pg 36) of the Stakeholder group meeting only annually and then appearing to fall into abeyance is understandable, but a shortcoming. I would suggest that this has in part contributed to the failure to deliver Aim 1. Further resources need to be deployed upon this to ensure effective identification of stakeholders and their engagement.

¹ Section 3.2 of SHEP 1

² Choosing our Future: Scotland's Sustainable Development Strategy.

5. Comments on the Evaluation of the Aims? Is anything missing?

Aim 6. This says that it has been achieved. This may be the case for the 2001 plan, but it is incorrect to state it has been achieved for this draft management plan since this is in consultation and has not been agreed. I believe that the significant changes proposed in this plan by the adoption of the heavy-handed Atkins approach means that there is not agreement to this plan.

Aim 8. As made clear elsewhere, the Atkins report proposal should be rejected and HS should concentrate on seeking to discharge its duties whilst not preventing sustainable development.

Aim 9. At present I would say that this has not been achieved. The blanket discouragement to wind development cannot be regarded as positive measures for the enhancement of the site. They are adversely affecting the rural economy and failing to deal with the climatic change effects that threaten the site.

Aim 10. If the planned massive expansion of the buffer zones is permitted then there will be a significant increase in workload to establish and maintain liaison with the increased numbers of affected landowners. It is unclear how the costs of this would be accommodated.

Aim 13. There is clearly a very long way to go on the delivery of this aim. The absence of effective and sustainably powered public transport for visitors is clearly a significant shortcoming. It is unclear whether there is the appetite or budget within HS to tackle such an important area.

Additionally there is little sign of effective energy management at Skara Brae when the doors are often propped open, the lights on during daylight hours and no apparent attempt to minimise water use or undertake recycling. There is no apparent attempt by HS to source its energy supplies from sustainable sources & the product range in the shop bears little sign of being sustainably sourced. Tackling all of these items would be extremely welcome, and HS should be commended for recognising the importance of its role in delivery of sustainable development.

Aim 16. Once again a greater emphasis on local products would benefit the visitor experience in Orkney and also the local economy.

Aim 17 & 18. There are clear statements as to the need for partnership working, however there is a prevailing view that HS keeps visitors to itself. I.e. there is little interaction with other features in Orkney. Whether there is greater potential to work with OIC and their museum services to disperse visitors to the farm museums and other sites should be explored.

6. Comment on Vision & Long –term aims for WHS:

The Vision is broadly acceptable. There is a significant omission in 6.3.1 by not having reference to the Setting in the middle three bullet points and the title. It is unclear if HS has the remit to control the use of the WHS or indeed the setting

Yours faithfully,