

HS Consultation Response ref: ORK/WHS/007  
RESPONSE FORM:

HEART OF NEOLITHIC ORKNEY WORLD HERITAGE SITE MANAGEMENT PLAN 2008–13

Please complete your name and address below and add your comments on the consultation beneath each question. Please return it with your respondent information form.  
Thank you for your help.

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<b>HEART OF NEOLITHIC ORKNEY WORLD HERITAGE SITE MANAGEMENT PLAN 2008–13</b>	
<b>Question 1</b> Do you have any comments on the current Buffer Zone?	
<p>The current Buffer Zone and its near equivalent of the proposed Inner Buffer Zones seem fully appropriate in terms of the extent and nature of the landscape they affect. They give a plausible case for proportionate development control which is readily understood.</p>	
<b>Question 2</b> Do you have any comments on the proposed Buffer Zones?	
<p>As above, the proposed Inner Buffer Zones seem appropriate in extent as development control mechanisms. However the proposed Outer Buffer Zone [OBZ] is seriously flawed in several respects, and lacks credibility as a result.</p> <p>1] its archaeological rationale derives from a new theory about Bronze Age [BA] landscape use of the West Mainland Bowl [WMB]. The analysis presents some plausible and interesting insights into potential sightlines from small BA features in and around the rim of the WMB into the centre of the WMB and the WHS core site locations. However, the results do not robustly demonstrate that the BA patterns were specifically focused on the WHS core sites in a way that might justify the OBZ extent. They could instead be an unrelated passive exploitation of the WMB topography. The theory deserves further analysis, particularly to highlight exceptions within the WMB and to compare BA viewsheds within and outside the WMB to show if the pattern within the WMB is sufficiently distinct from the norm to add to the WHS. If the BA analysis is regarded as sufficiently valuable to warrant the OBZ extent, then it should be recognised and validated as an element of the Outstanding Universal Value [OUV]; unless it is given this procedural kudos, the use of the BA analysis to underpin the OBZ concept seems a tactic to sterilise the WMB on relatively minor and as yet flimsy archaeological arguments.</p> <p>2] despite the BA landscape elements, it is unclear why the OBZ extends beyond the ridgelines which define the WMB rim, and why it should extend for more than 10km from the WHS core sites, which is both substantially more than PAN 45 distance guidelines would suggest and probably futile for most prevailing visibility conditions in the WMB.</p> <p>3] the other big concern about the OBZ is that no analysis is given for the cost to Orkney's</p>	

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economy and communities of the consequent development control. Until further information is given about what developments might be prohibited or controlled (eg is it purely directed at wind turbines? what else might be caught?), what planning regime might prevail (would the threshold be "any adverse impact" or "a significant adverse impact"?), and some predictions of economic impact, then the OBZ has the potential to become a major threat for Orkney's future viability and sustainability. As a non-statutory designation, the rationale for retaining a WHS is crucially dependent on its benefits for the host area, and that its obligations stay a long way short of the tipping point where constraints overtake benefits. The massive proposed OBZ suggests that it could bring such a tipping point into effect. If the WHS then loses its positive balance for Orkney, then its rationale collapses and OIC, in particular with its mission of governing for the benefit of all of Orkney and its people, could no longer justify supporting the WHS.

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Alternative approach: recent events such as the implications of the currently unresolved Merranblo enquiry and increased UNESCO emphasis on setting issues are noted. While the increased OBZ capture might reassure UNESCO, it would not resolve future Merranblo-type scenarios where OIC need the flexibility to take planning decisions on a broader view of Orkney's requirements and prospects than just the WHS obligations; ultimately the size of or even the existence of an OBZ is incidental for OIC's perspectives. Instead of an OBZ, the real need is for UNESCO, HS and OIC to agree a robust and consistent statement of intent for handling planning proposals which might cause significant adverse impacts on the WHS core sites from locations outside the IBZ. All three organisations, as well as the Orkney community and potential developers, need a predictable and realistic process in which all perspectives can be integrated pragmatically. An OBZ does not change that need nor provide a reliable solution – instead it is probably a distracting irrelevance with little real value for the planning process.

**Question 3**

Do you have any comments on the Other Values of the World Heritage Site; is anything missing?

No specific suggestions for additions - the range of values is broad and should enable most perspectives to be accommodated. However the economic value is underplayed - it is a crucial rationale rather than an incidental item, and should be emphasised above the other values and expanded in scope.

**Question 4**

Do you have any comments on the range of Stakeholders that have an interest in the World Heritage Site; are any missing?

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Again this is underplayed, although the main elements are briefly identified. A dynamic approach for active stakeholder engagement is needed to ensure the WHS does not just operate for the purposes of a WHS, but is good for Orkney. (see also answer to Q12)

**Question 5**

Do you have any comments on the Evaluation of the Aims and Actions of the 2001 Management Plan; is anything missing?

The main concern is that there is very little mention of evaluating economic impact and benefit for Orkney, even though to date these elements probably give a positive balance. Again a shift in thinking is needed from good-for-the-WHS indicators to identifying and pursuing good-for-Orkney evidence.

**Question 6**

Do you have any comments on The Vision or Long-term Aims for the World Heritage Site?

The issue of concern is yet again the lack of any real external thinking about ensuring benefits for Orkney rather than the narrower pursuit of WHS aims.

**Question 7**

Do you have any comments on the Issues identified for the World Heritage Site over the next five years; is anything missing?

My answer is the same as for Q6 for the same reasons.

**Question 8**

What in your opinion is/are the Issue(s) of the highest priority and why?

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The need is to change the mindset to prioritising benefits for Orkney as the overriding ambition, not what in the real world are the secondary needs of the WHS. Recent conversations have suggested that some senior people involved with the WHS management team only see the needs of protecting the WHS and its international prestige as the primary concern. I vehemently disagree - to my mind, the WHS regime should be prepared to accept its ultimate expendability if its demands become too constraining or it no longer provides the best opportunity for Orkney, and it should therefore be ensuring such a point is never reached by maximising all benefit strategies and applying the utmost caution in proposing restrictive obligations.

At the Stenness consultation event, a venerable and respected Orcadian with an immense pride in their heritage and no windfarm involvement whispered to me that the colonial imperialists had returned again. My impression is that this is an opinion held by many Orcadians in relation to the WHS proposals, and it should be treated as a serious message to avoid any possible future backlash against the continuation of the WHS from the people whose lives would be affected by its implementation.

**Question 9**

Do you think that there any issues in the Management Plan that may affect an equality group (age, disability, religion and belief, gender, LGBT (lesbian, gay, bisexual and transgender), race); if so, how, and what can be done to mitigate them?

No expertise to respond.

**Question 10**

Do you have any comments on any of the specific Objectives, how they relate to the Issues and how they have been prioritised?

From my previous comments, it should be evident that my concerns mainly derive from the lack of an external perspective. As a result, I can find no real mention of the following indicators, posed here as reciprocal questions.

1] How are the economic effects of the WHS being measured, by whom, and under what criteria?

2] What responsibilities are defined in legislation, policy and the WHS agreements to ensure such economic assessments are undertaken?

**Question 11**

Do you have any comments on how any of the specific Objectives will be monitored?

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Again, omissions of scope give two reciprocal questions.

1] Is there any intention to evaluate the economic implications of the increased buffer zones before proceeding with steps towards their implementation?

2] How can any of the WHS partners anticipate when any of the WHS activities and protections might approach a tipping point where the accompanying benefits are outweighed by the economic drag?

These may be big scary questions in many respects for a heritage initiative to contemplate, but many indicative answers could be found from examining planning applications received in the last decade by OIC from the various buffer zone areas, and identifying whether their outcomes were affected by WHS concerns. These emergent trends could then be extrapolated into a predictive analysis which could highlight where the tipping point might lie and the steps needed to ensure it is never reached.

**Question 12**

Do you have any general comments about how the Management Plan will be implemented and progress reported?

Given the need to ensure the WHS operates dynamically for the good of Orkney, the current composition of the management team is probably a severe constraint, with three of the four partners being primarily heritage conservation agencies. A wider management group could create a much greater coherence across the identified stakeholder interests, with some suggestions being:

1] HIE to give an Orkney-based economic perspective, and possibly to help develop a strategy to measure the wider impacts of the WHS for Orkney

2] community council representation from the West Mainland districts to give a direct influence from the people who live in and around the WHS; the community involvement in many Orkney windfarm proposals and OIC's championing of such community involvement makes these viewpoints particularly relevant alongside the variety of other community issues for the WHS

3] representation from Orkney's renewables energy sector to allow as much opportunity for early liaison and sharing of agendas as can be built to avoid reaching incompatible strategic choices for Orkney's future (note also the Scottish Parliament debate suggestion along these lines on 23:04:08)

4] representation from Orkney's tourism sector to provide a voice for the wider industry and reduce the chances of the WHS honey-pot characteristics damaging other players.

**Question 13**

Do you have any other comments about the Management Plan that you have not covered in your responses to other questions?

A final point about the OBZ proposals which may resolve itself in the near future, but deserves a mention as a current uncertainty. If the result of the Merranblo enquiry is approval for the application, would the outcome be that UNESCO put the Orkney WHS on the endangered list, as their enquiry evidence threatened? If the Orkney WHS goes on the list, how much benefit is there in pursuing other strategies to protect the setting? Would any ambitions for an OBZ automatically be abandoned, which logically should be the consequence?

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<b>ENVIRONMENTAL REPORT</b>
<p><b>Question 14</b> Do you have any comments on the baseline information, or the environmental problems/issues?</p>
<p>No</p>
<p><b>Question 15</b> Do you have any comments on the approach taken for the environmental assessment?</p>
<p>My understanding of a Strategic Environmental Assessment is that it should assess the Strategic Environment, with particular emphasis on the costs and advantages of adoption or non-adoption of the proposals (see for instance the SEAs accompanying HS releases of SHEP draft consultations). The WHS SEA misses this dimension entirely, and only covers environmental measures of WHS activities and its "green" credentials. I suggest this is a major deficiency which severely hinders the ability to fully anticipate the impacts and implications of the WHS now and in the future, and therefore the ability to fully respond to this consultation exercise.</p>
<p><b>Question 16</b> Do you agree with the results of the environmental assessment? Have we identified the key issues?</p>
<p>No response.</p>
<p><b>Question 17</b> Do you have any comments on the environmental mitigation measures, including the schedule of commitments?</p>

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No response.

**Question 18**

Do you have any comments on the proposed additional environmental monitoring indicators?

No response.