

HS Consultation Response ref: ORK/WHS/011  
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.

Name	Orkney Sustainable Energy Ltd Richard Gauld BSc(Hons) IEng MInstMC Dip.DesInn
Postal Address	6 North End Road Stromness Orkney KW16 3AG
<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?	
The current Buffer Zone appears appropriate and of the correct scale to ensure adequate development control in the immediate surroundings of the WHS monuments.	
<b>Question 2</b> Do you have any comments on the proposed Buffer Zones?	
The proposed Inner Buffer Zones largely follows the existing buffer zone and seem appropriate	
The use of the NSA or the SSSI boundary seem to be inappropriate as buffer zones since they are created for different purposes.	
The proposed Outer Buffer Zone is significantly flawed and cannot be incorporated into the WHS management plan as a result.	
There is no rationale for extending the Outer Buffer Zone beyond the ridgelines which define the WHS boundaries, nor should it extend for more than 10km from the Ring of Brodgar, Stones of Stenness, Maes Howe and Skara Brae.	
The Outer Buffer Zone map has used 150m tall wind turbines to identify any locations where any part of a turbine could be seen from the World Heritage Site, and then has increased the boundary to the next road or coastline. Such turbines do not exist and cannot be located in Orkney due to access issues and lack of suitable sites. HS is content that the Holodyke and Burgar Hill wind energy projects do not have significantly adverse impacts upon the WHS, yet both of which are clearly visible from the Ring of Brodgar.	
The zone of visual influence map should be used for discussion and guidance, but cannot be	

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used to define an Outer Buffer of the WHS. Appended to this form is a ZVI map produced to help design the Bargar Hill windfarm and is more realistic definition of the skyline around the WHS, and shows possible areas of significant impact; blanket ban of wind turbines in this area is not acceptable.

**Question 3**

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

There is no evidence that the WHS monuments were deliberately sited within the local topography, and indeed in the case of Skara Brae and Boardhouse the villages are there because they are near the the food supply - not because of the view! The Brodgar and Stenness peninsulars were natural elevated routes through a predominatly flat and marshy landscape, and there is no evidence that the monuments are visually linked with the surrounding ridgelines.

**Question 4**

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

The WHS should be there for the good of the residents of Orkney as well as tourists; Orcadians built the monuments, Orcadians were custodians of the sites long before Historic Scotland, SNH and UNESCO existed, and the monuments will be there long after these organisations are replaced. Local stakeholders have been forgotten.

Given the proposed landscape policies and criteria proposed within the management plan, opportunities for producing renewable energy are under threat. The range of Stakeholders should be increased to include the renewables sector, the Stromness Community Business Forum, the Economic Developemnt Department of the Council, the Community Councils and the Community Development Trusts within the proposed buffer zones.

**Question 5**

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

There has been little evaluation of economic impacts and benefits for Orkney. Attempts at restricting the potential for economic growth of a fragile community are not acceptable, and positive measures should be put in place to encourage economic growth - the establishment of a Gateway to the WHS in Stromness would be welcomed by the community.

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**Question 6**

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

There has been no attempt to ensure long term economic benefits for Orkney.

The setting of the WHS should reflect recognisable features where the concept of setting may affect the economic viability of the surrounding community.

**Question 7**

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

There has been no justification as to why wind turbines would be a threat to the WHS; Historic Scotland had no concerns with the Holodyke and Burgar Hill wind energy projects.

There is significant risk of erosion from the effects of climate change, and there is significant risk from the physical impact of increased visitor numbers and the climate change impact of increased visitor numbers.

Great emphasis is placed upon the setting of the WHS, yet visitors are treated like factory produced chickens; everyone is herded through the monuments as quickly as possible, ensuring maximum number of visitors and maximum economic gain to Historic Scotland.

If the setting is important, there should be an extensive network of footpaths and cycleways linking each of the sites, to enable visitors to have the time to appreciate the surrounding landscape.

**Question 8**

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

Prioritise benefits for Orkney

Provide cycletracks and walkways between all the monuments

Establish a WHS Gateway in Stromness - a site is available

Recover a sense of local ownership

Trust Orcadians to look after the sites

The proposed Outer Buffer Zone should be disbanded completely

Remove all Historic Scotland badges, signs and flags; these monuments are not the property of HS. Create a new brand - the Orkney WHS.

**Question 9**

Do you think that there any issues in the Management Plan that may affect an equality group

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(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 comment.

**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?

There is no case for the suggested outer buffer zone and its use in draft planning guidance is not acceptable; the extended buffer zone map and the proposed wind energy planning guidance cannot in themselves be used to justify each other

Wind turbines can be accommodated in appropriate locations within view of the WHS monuments provided the impacts are not significantly adverse; SPP6 and PAN45 are the existing guidance on visual impacts

Wind turbines in Orkney help to offset the carbon footprint of tourists visiting Orkney; if a blanket ban on wind energy development is proposed then HS should come up with their own positive climate change measures; carbon saving, electric buses, walkways, cycletracks.

The economic effects of the proposed changes to the management of the WHS have not been assessed.

**Question 11**

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

The case for restricting wind energy projects outwith the Inner Buffer Zone is not credible; consult with the organisations responsible for planning wind farms in Orkney.

Provide an evaluation of the local social, environmental and economic implications of the proposed extended buffer zones.

**Question 12**

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

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There is a need to ensure that the WHS operates for the good of Orkney; a wider group of local stakeholders is required:

Stromness Community Business Forum;  
Stromness Community Development Trust;  
Stromness Community Council;  
West Mainland Community councils;  
Orkney Sustainable Energy Ltd;  
Scotrenewables Ltd;  
Orkney Renewable Energy Forum;  
Orkney tourism sector.

**Question 13**

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

No comment

**ENVIRONMENTAL REPORT**

**Question 14**

Do you have any comments on the baseline information, or the environmental problems/issues?

No comment

**Question 15**

Do you have any comments on the approach taken for the environmental assessment?

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It is suggested that the Management Plan will have no effect on climate change; this is incorrect as the buffer zone would stop all wind energy development, as interpreted by Orkney Islands Council in the draft wind energy planning guidance. If we are unable to produce renewable energy to combat the effects of climate change then Historic Scotland needs to put in place positive measures which compensate for the climate change impact of increased visitor numbers to the monuments.

**Question 16**

Do you agree with the results of the environmental assessment? Have we identified the key issues?

The environmental assessment has not considered the economic and social effects of the proposed management plan.

**Question 17**

Do you have any comments on the environmental mitigation measures, including the schedule of commitments?

No comments.

**Question 18**

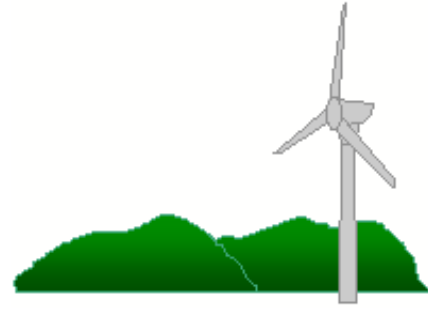
Do you have any comments on the proposed additional environmental monitoring indicators?

No comment.

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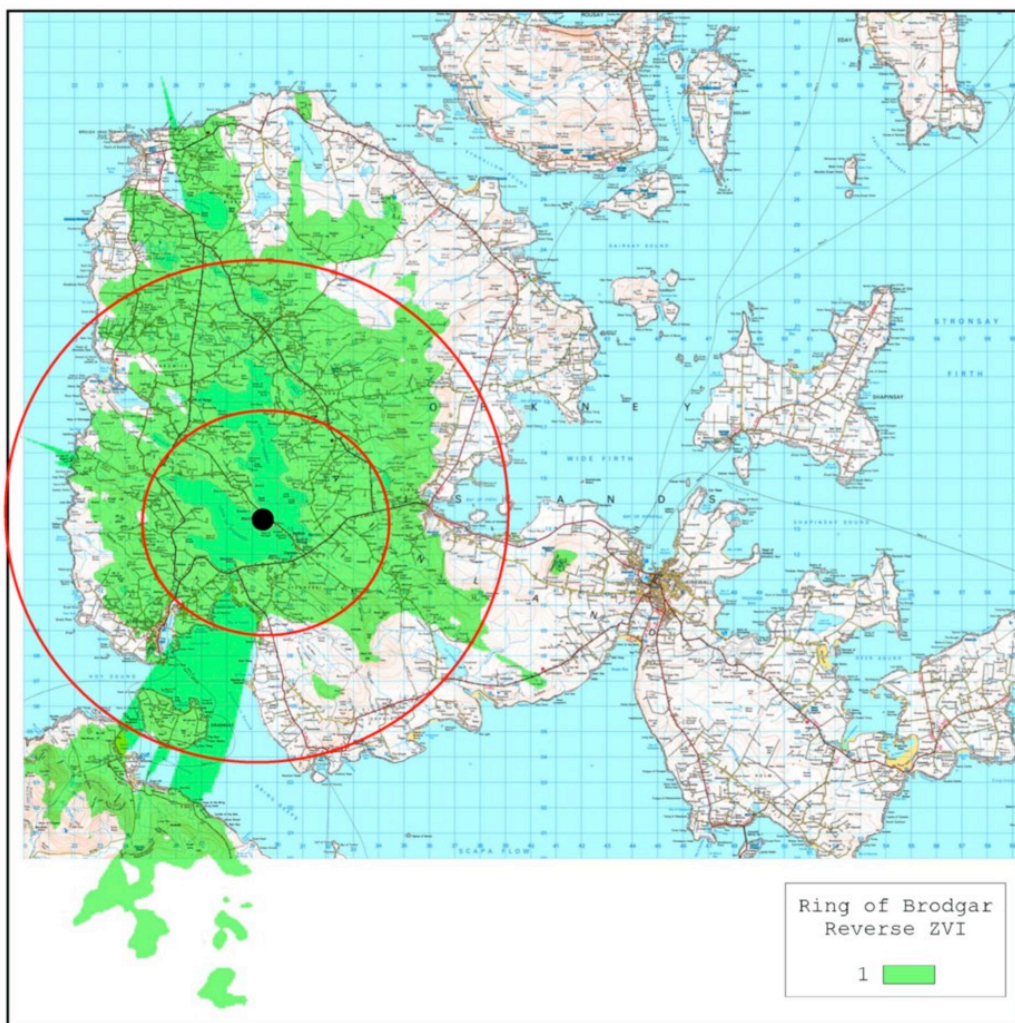
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## Heart of Neolithic Orkney World Heritage Site Management Plan 2008-2013

### Response from Orkney Sustainable Energy Ltd

#### Appendix: Horizon around the Ring of Brodgar



*Reverse ZVI map centred on Brodgar.*

This map shows the locations where 2MW scale wind turbines would be seen on the horizon from the Ring of

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18 June 2008