

Our Ref: SEA00291/SH/E  
R  
SG Ref: 00273

Attention: Jennifer Craig

Historic Scotland  
Longmore House  
Salisbury Place  
Edinburgh

2 June 2008

By email: [sea.gateway@scotland.gsi.gov.uk](mailto:sea.gateway@scotland.gsi.gov.uk)

Dear Ms Craig

**ENVIRONMENTAL ASSESSMENT (SCOTLAND) ACT 2005  
HEART OF NEOLITHIC ORKNEY WORLD HERITAGE SITE MANAGEMENT PLAN –  
ENVIRONMENTAL REPORT**

I refer to your Environmental Report consultation submitted under the above Act in respect of the above plan. This was received by SEPA via the Scottish Government SEA Gateway on 9 May 2008.

SEPA has used its Scoping consultation response of April 2008 to consider the adequacy of the Environmental Report and this is used as the framework for detailed comments which can be found in Appendix 1. For convenience, these comments have been structured to reflect that of the Environmental Report. Please note, this response is in regard only to the adequacy and accuracy of the Environmental Report and any comments SEPA may have on the Plan itself will be provided separately.

As you are fully aware, as the Plan is finalised, Historic Scotland as Responsible Authority, will require to take account of the findings of the Environmental Report and of views expressed upon it during this consultation period. As soon as reasonably practical after the adoption of the plan, the Responsible Authority should publish a statement setting out how this has occurred. SEPA normally expects this to be in the form of an "SEA Statement" similar to that advocated in the Scottish Government SEA templates and toolkit which is available at [www.scotland.gov.uk/Publications/2006/09/13104943/13](http://www.scotland.gov.uk/Publications/2006/09/13104943/13). A copy of the SEA statement should be sent to the Consultation Authorities via the Scottish Government SEA Gateway on publication.

Should you wish to discuss this consultation, please do not hesitate to contact me on 01349 860359 or via SEPA's SEA Gateway at [sea.gateway@sepa.org.uk](mailto:sea.gateway@sepa.org.uk).

Yours sincerely,



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## **Appendix 1: Comments on the Environmental Report**

### **1. General Comments**

The Environmental Report is informative and easy to follow. SEPA generally agrees with the assessments made and has the following limited detailed comments to make.

### **2. Detailed Comments**

1. All the relevant background information seems to be provided.
2. SEPA welcomes the fact that, as requested at scoping stage, flood risk has been considered in more detail in the ER.
3. SEPA welcomes the very clear setting out of which aspects of the plan will and will not be assessed. SEPA is satisfied that all aspects of the plan that could have significant effects have been assessed.
4. SEPA notes and welcomes the change in the SEA Objective for water and the addition of flood risk as a SEA criterion.
5. SEPA welcomes the clear setting out of the screening exercise and in relation to SEPA's interests accepts the conclusions of which objectives need not be assessed further.
6. It is noted that alternative wording for the vision, aims and issues, and objectives was considered as part of the plan making process. The ER states that the SEA team were advised of these revisions but that the assessments of each revision have not been documented. It would have been interesting if some additional information on this process had been provided, perhaps giving examples of earlier assessment and an explanation of whether any changes were made specifically as a result of the assessments made.
7. In relation to the assessments presented of the aims SEPA accepts that there should be no negative effects against the SEA objectives it has an interest in. SEPA welcomes the enhancements proposed and would hope that the one in relation to clarifying that the environment includes soil, water and climatic factors is subsequently implemented.
8. SEPA is satisfied with the assessments of the objectives presented and makes the following more detailed comments on some.
  - 8.1 Objective 11: SEPA agrees that negative effects against the soil, water and climatic factors environmental parameters are possible. SEPA notes that EIA will be required for any subsequent works and that early consultation will be sought with SEPA. SEPA considers that this mitigation is acceptable.
  - 8.2 Objective 13: As visitor erosion is essentially soil erosion any actions which address this issue could have a positive effect against the soil SEA Objective.
  - 8.3 Objective 27: SEPA agrees that changes to the car parking could result in both short and longer term negative effects on the water environment. These effects could be mitigated by ensuring that both construction works and the final car park are provided with a Sustainable Drainage System (SuDS). Further details on SUDS is available from SEPA's website ([www.sepa.org.uk](http://www.sepa.org.uk)) or from the CIRIA website (The SUDS Manual – [www.ciria.org.uk](http://www.ciria.org.uk)).

9. In addition to the mitigation outlined with the annex, table 7 provides a schedule of additional commitments. SEPA welcomes this clear setting out of the proposed actions and in relation to the issues for which we has an interest, all the actions are welcomed.