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Our case ID: 300019287  
Your ref: 01913 Scoping  
27 November 2024

Dear Nina Caudrey

**Environmental Assessment (Scotland) Act 2005**  
**01913 Scoping - Orkney Islands Council - Local Development Plan including Topic**  
**Papers**  
**SEA Scoping Report**

Thank you for your consultation on the above scoping report which we received on 23 October 2024. We have reviewed this in our role as a Consultation Authority under the above Act. This letter contains our views on the scope and level of detail of the information to be included in the Environmental Report. Our view is based on our main area of interest for the historic environment.

#### **Scope and level of detail**

We understand that this scoping report sets out the approach to the assessment of Orkney Islands Council's Local Development Plan and that the historic environment has been scoped into the assessment. On the basis of the information provided, we are content with the approach outlined in the report and are satisfied with the scope and level of detail proposed for the assessment, subject to the detailed comments in the attached annex. We welcome that the historic environment is scoped in to the assessment.

#### **Consultation period for the Environmental Report**

We note that the environmental report and proposed plan will be consulted upon for a minimum 12 week period and we are content to agree with this timescale. For our purposes the consultation period starts when the [SEA Gateway](#) receives the relevant documents.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Victoria Clements. You can contact them by phone on 0131 668 8730 or by email on [Victoria.Clements@hes.scot](mailto:Victoria.Clements@hes.scot).

Yours sincerely

## Historic Environment Scotland



## ANNEX

### SEA Draft Objectives

We are content with the draft SEA objective (7b) relevant to our historic environment topic area. However, we note that the draft SEA sub-objective (7b) is very broad in its scope. We have prepared updated model SEA objectives, sub-objectives and assessment questions which you may find helpful in considering whether more targeted objectives would assist in focusing the assessment on the historic environment. The model objectives in Appendix 1 below also consider the alignment with NPF4 policies which you may also find helpful.

### Proposed methodology

We are generally content with the proposed methodology as defined in section 3 of the scoping report. We welcome that Table 3 – proposed environmental assessment template includes scoring for both before and after mitigation. We note that at present it is considered that the majority of policies in NPF4 will be appropriate for use in the Orkney Islands Council LDP and that it is proposed to scope out these policies from further environmental assessment as they have already been subject to SEA during the preparation of NPF4. We are content to agree with this and also welcome that any new policies and any NPF4 policies requiring adaptation specifically for Orkney will be subject to SEA.

We presume that Table 3 is proposed to be used for assessing both policies as well as the spatial elements of the Plan. As you will be aware, in our submission of historic environment evidence to your council we noted that the SEA Consultation Authorities had updated the [Local Development Plan Site Assessment and SEA Checklist](#) to align with NPF4. We would therefore encourage approaches to the review of sites that avoid duplication of effort.

We welcome that the longevity/permanence of any effects and the potential for cumulative effects are built into the assessment. We welcome that monitoring of environmental effects is proposed as part of the methodology, however, at present there is no information provided on potential monitoring indicators for each SEA topic. We would be happy to provide advice on this element of the assessment if that would be helpful.

### Environmental baseline information

We welcome that the historic environment information supplied by us during the evidence gathering stage is reflected in Annex II of the scoping report. However, we note that the information provided is limited at this stage and that no information is provided regarding undesignated assets within Orkney Islands Council area. We note that the data and information sources for Topic 7: landscape and cultural heritage does not identify Orkney



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Islands Council own historic environment records as a relevant data source for the Council area.

#### [Annex 1 – Other plans, programmes and strategies](#)

We welcome the inclusion of the [Historic Environment Policy for Scotland](#) (HEPS) here but would note that the name of the policy needs to be updated as the Policy Statement was replaced by the current policy in 2019.

You may wish to consider including [Our Past, Our Future](#) which was published in April 2023. The strategy sets the direction of travel for the historic environment sector and identifies the priority areas of action to focus work to support this mission. The 3 priorities are *Delivering the transition to net zero*, *Empowering resilient and inclusive communities and places* and *Building a wellbeing economy*. The importance of the contribution that the maintenance, reuse and adaptation of our historic environment can make in preventing waste and reducing carbon emissions is recognised under the transition to net zero priority.

Also worth noting is [Pointing the Way to the Future](#) which is HES' climate and nature crisis statement. It recognises that the historic environment is part of a just transition to net zero. It contributes to our places, communities and identities and recognises that the reuse of historic assets is central to sustainable development.

In terms of the Managing Change Guidance Notes the reference to the Scottish Historic Environment Policy (SHEP) and Scottish Planning Policy (SPP) should be updated to HEPS and NPF4.

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## Appendix 1 – Model SEA objectives, sub-objectives and assessment questions

Historic environment objective	To protect and promote the historic environment		
Sub objective	Assessment criteria – will the policy or proposal be likely to affect:	Assessment questions - does the policy or proposal	Key NPF4 policy connections
To protect and enhance historic environment assets and their settings	<ul style="list-style-type: none"><li>• World Heritage Sites*</li><li>• Scheduled monuments</li><li>• Listed buildings</li><li>• Inventory battlefields</li><li>• Inventory gardens and designed landscapes</li><li>• Conservation Areas</li><li>• Undesignated historic environment assets</li><li>• Streetscapes and settlement patterns</li></ul>	<p>Protect the site and setting of affected designated and undesignated historic environment assets?</p> <p>Enhance the site and setting of affected designated and undesignated historic environment assets?</p>	4, 6, 7, 20
To promote and enable the retention of historic environment assets	<ul style="list-style-type: none"><li>• Buildings at Risk**</li><li>• Vacant or under-used historic environment assets</li><li>• The condition of the historic environment as a place to live, work and visit</li></ul>	Promote or enable the retention, maintenance and sustainable use or re-use of historic buildings and infrastructure?	1, 2, 7, 9, 12, 16, 18, 20, 23

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Historic environment objective	To protect and promote the historic environment		
Sub objective	Assessment criteria – will the policy or proposal be likely to affect:	Assessment questions - does the policy or proposal	Key NPF4 policy connections
To make the historic environment more climate resilient and to reduce emissions from the historic environment	<ul style="list-style-type: none"><li>• The energy efficiency or energy supply of historic environment assets?</li><li>• The vulnerability of historic environment assets to current or future impacts of climate change?</li></ul>	<p>Support the repair and appropriate retrofit of historic buildings?</p> <p>Support the transition to green energy supply in historic buildings?</p> <p>Include adaptation measures to make the historic environment assets and places more resilient to the effects of climate change (e.g. coastal erosion, flooding etc)?</p>	1,2, 7, 10, 16, 17, 18, 19, 20, 22
To promote and enable access, understanding and enjoyment of the historic environment	<ul style="list-style-type: none"><li>• The historic environment's role in high quality place making</li><li>• Tourism, recreation and cultural activity at historic environment assets and places</li></ul>	<p>Enable the historic environment to support creation of high-quality places and spaces?</p> <p>Promote sustainable, responsible tourism, recreation and cultural activity?</p>	7, 13, 14, 15, 17, 18, 20, 21, 23, 25, 27, 29, 30, 31

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