

## **Our Place in Time -The Historic Environment Strategy for Scotland**

**Strategic Environmental Assessment  
Post-adoption SEA statement**

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## **1. Introduction**

The Environmental Assessment (Scotland) 2005 Act requires public bodies in Scotland to carry out a Strategic Environmental Assessment (SEA) on their plans, programmes and strategies. SEA is a way of examining plans as they develop, to identify any significant effects they may have on the environment. It ensures that environmental considerations are taken into account. SEA also aims to build into the plan mitigation measures, to avoid or minimise any potentially significant adverse effects on the environment, and look for opportunities to enhance a plan's environmental performance.

This report sets out how the Historic Environment Strategy for Scotland has taken account of environmental considerations during its development with stakeholders and through subsequent consultation. The plan to merge Historic Scotland and the Royal Commission on the Ancient and Historical Monuments of Scotland (RCAHMS) has been considered separately for the purposes of SEA and is not included in this statement.

### **1.1 Background to the consultation**

On 8 May 2013, the Scottish Government launched a Joint Consultation on the Historic Environment Strategy for Scotland and the Merger of Historic Scotland and the Royal Commission on the Ancient and Historical Monuments of Scotland (RCAHMS). The consultation sought views on the proposed Strategy and on the merger of the two organisations, however this statement relates only to the Strategy and responses to its environmental assessment.

The Strategy element of the consultation dealt with issues relating to defining the 'historic environment', a vision for Scotland's historic environment and overarching principles for delivering that vision. Views were then sought on four aims; these aims encompass 'cross-cutting strategic priorities', 'investigate and record', 'care and protect' and 'share and celebrate'. Each aim is underpinned by a range of strategic priorities.

A 'Strategic Environmental Assessment' (SEA) was undertaken on the draft Strategy to meet the requirements of the Environmental Assessment (Scotland) Act 2005. The findings of the environmental assessment were set out in the Environmental Report that accompanied the draft Strategy during the consultation.

The consultation ran until 31 July 2013. A total of 96 consultation responses were received; 20 from individuals and 76 from organisations. These are available at: [www.scotland.gov.uk/Publications/2013/09/4850/downloads](http://www.scotland.gov.uk/Publications/2013/09/4850/downloads)

Hard copies can be consulted at the Scottish Government Library, Y Spur, Saughton House, Broomhouse Drive, Edinburgh, EH11 3XD. To request copies by post, enquire about photocopying charges or make an appointment to view responses, telephone 0131 244 4556 or email [SGLibrary@scotland.gsi.gov.uk](mailto:SGLibrary@scotland.gsi.gov.uk).

An Analysis Report which considers the number and profile of participants, summarises the written responses and public meeting discussion, analyses the

views expressed, and identifies the key issues raised is available through the Scottish Government website:

<http://www.scotland.gov.uk/Resource/0043/00437691.pdf>

## 1.2 Report objectives

Section 18(3) of The Environmental Assessment (Scotland) 2005 Act sets out the information that should be included in this SEA Statement. In summary, it should include:

- how the environmental considerations have been integrated into the Strategy;
- how the Environmental Report has been taken into account;
- how the opinions of consultees have been taken into account;
- the reasons for choosing the Strategy as adopted, in light of the other reasonable alternatives considered; and
- measures to be taken to monitor the significant environmental effects of the implementation of the Strategy.

This statement therefore sets out the information required for the post adoption stage in the SEA process. It explains how the findings of the environmental assessment have informed the finalised Strategy, how the opinions expressed on the environmental assessment have been taken into account, and identifies the measures proposed to monitor any significant environmental effects.

For clarity, the following table identifies where the information required at the post adoption stage can be found:

**Table 1: SEA Post Adoption Statement**

Information required by the SEA Act	Section
How environmental considerations have been integrated into the Strategy	2.2
How the environmental report has been taken into account	2.2
How the opinions expressed during the consultation period have been taken into account	1.4 and Annex A
Transboundary consultations	There were no transboundary consultations as the Strategy will not affect other EU Member States.
Reasons for adopting the finalised Strategy	3.1
Monitoring	3.2

The final Strategy is available from <http://www.scotland.gov.uk/Publications/2014/03/8522>

Hard copies may be requested by contacting Hannah Eamer (0131 244 7458) at [HE\\_policy@scotland.gsi.gov.uk](mailto:HE_policy@scotland.gsi.gov.uk)

### **1.3 The consultation methods**

Prior to public consultation on the draft Strategy, discussion papers and draft material were circulated to workstream members participating in the Review of Historic Environment Policy in Scotland via a series of meetings and an online knowledgehub<sup>1</sup>. The views of participants, culminating in a plenary session attended by 66 stakeholders, shaped the development of the draft Strategy.

The subsequent public consultation was widely advertised in the media and through a series of events, workshops and surveys, including a survey of Historic Scotland members, and a publicly distributed leaflet. Feedback from round-table dialogue, meetings and participative workshops held during the consultation period was provided verbally and in writing via a dedicated mailbox and were taken into account when finalising the Strategy.

#### **Scoping stage**

The SEA process involved a number of stages prior to the publication of the Environmental Report which required statutory engagement with the Consultation Authorities, Scottish Natural Heritage (SNH) and the Scottish Environment Protection Agency (SEPA). In November 2012, we sought their views on the proposed scope and level of detail of the environmental assessment. We also circulated the scoping report to members of the workstreams via online knowledgehub.

All respondents at the scoping stage agreed with our overall approach and offered very helpful comments, particularly regarding environmental data and issues. These were taken into consideration during the course of the assessment. Copies of the responses returned during the scoping consultation can be found in Annex 2 of the Environmental Report.

#### **Draft Strategy and Environmental Report**

Following the assessment, we then invited views on the draft Strategy and its Environmental Report. This was issued for public consultation on 8 May for twelve weeks. The consultation documents were available to download from the Scottish Government and Historic Scotland websites.

The Analysis Report sets out in detail this phase of the consultation process. Respondents were invited to use a response form which set out 33 consultation questions with Yes/No responses and space for comments under each.

Following the public consultation, independent consultants were appointed to produce a consultation analysis report. Officials at Historic Scotland, RCAHMS and The Scottish Government subsequently used this analysis report to review the issues identified during the consultation exercise, taking these into account in finalising the Strategy. During this period meetings were also arranged with a range of stakeholders. In each of these meetings discussion focused on the areas of the draft Strategy most relevant to their interests.

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<sup>1</sup> Knowledge hub (<http://knowledgehub.local.gov.uk/group/historicscotlandreviewofhistoricenvironmentpolicy>)

## 1.4 Summary of views and other information

Sections 3 to 14 of the Analysis Report outlines the opinions expressed during the consultation period under each question. These views are summarised in Section 1 of that report.

With specific reference to the SEA and the Environmental Report, the respondent information form invited consultees to consider the following question:

**Question 13.** Do you think that the strategic environmental assessment has identified the key issues associated with the environmental implications of the Strategy?

As can be seen in the following table, a large majority of respondents that answered this question felt the strategic environmental assessment had identified the key issues associated with the environmental implications of the Strategy.

**Table 2: Responses to Question 13**

Respondent group	Yes	No	Yes and No	No reply
Individuals (20)	5	3	-	12
Local authority (17)	11	1	-	5
NDPB/Agency (11)	4	2	-	5
Professional body (10)	5	-	-	5
Voluntary organisation (23)	5	3	1	14
Other (15)	7	-	-	8
<b>Total (96) (%*)</b>	<b>37 (38%)</b>	<b>9 (10%)</b>	<b>1 (-%)</b>	<b>49 (51%)</b>

\*percentages have been rounded

Those respondents who answered no were asked to say what was either missing or needed to be changed. Comments were noted in 17 responses including comment from a number that had answered yes.

Specific points raised by those who felt that the SEA had identified the key issues associated with the environmental implications of the Strategy were:

- That the Strategy may be too ambitious in respect of available resources;
- The need for “continuing vigilance to see that no part of the current structures are disadvantaged in the process” (voluntary organisation);
- The need to strengthen policy application and support through to local authority level;
- A number of specific points related to town centres and town centre regeneration including the regeneration of derelict buildings; and
- A comment on the impact of increased tourism on infrastructure.

The Consultation Authorities, SNH and SEPA, both agreed with the findings of the environmental assessment and highlighted the need to ensure that any recommendations arising from the assessment are taken forward into the implementation of the Strategy. Our approach to this is outlined under section 2.3.

One theme to emerge from a small number of those who said that the SEA had not identified the key issues associated with the environmental implications of the Strategy was that it is too public-sector based; implying that the SEA will therefore need to be further developed to account for private-sector elements of the Strategy.

There was a comment on the need for a clear link to the preventative approach signalled in the Strategy.

A voluntary organisation pointed out that some updates are required:

*“The current SEA was written before the policy functions of Historic Scotland were relocated to the Culture and Heritage Directorate of the Scottish Government”.*

There were some queries over the baseline data used:

*“The implications of removing the SHEP focus on Designations and Consents are not properly addressed. It is of particular concern that the built environment evidence base for the EA is the poor and rushed SHEA 2012 – with the high level Buildings at Risk virtually ignored. There is a distinct absence of data within the Baseline Information – not only of the condition of the historic environment and of the positive impact of retaining and reusing buildings (and embodied energy approach) – but also of the skills and knowledge available.”*

(local authority)

*“The baseline data on landscape should be extended to include SNH's landscape character assessment of Scotland and its regions – this is more relevant to the condition of the Historic Environment than the recent wild land mapping (interesting though it is).”*

(individual)

*“Baseline information could be strengthened by reference to SNH's landscape character assessment reports, a comprehensive exercise covering the whole of Scotland and which incorporates archaeological and built heritage features. The text should also reference Scotland's World Heritage Sites and the National Performance Framework.”*

(voluntary organisation)

A respondent also commented on the findings of the assessment, noting that the benefits and positive impacts of using traditional building materials for both maintenance and also for new-builds had not been fully addressed:

*“Again the impact of using indigenous materials for the repair and maintenance of the built historic environment has not been approached.”*

*This is particularly relevant to the environmental implications of the strategy”.*  
(NDPB/Agency)

## **2. How have environmental views and information on the SEA been taken into account?**

### **2.1 Introduction**

This section identifies the key issues raised both during the SEA of the draft Strategy and the comments made on the Environmental Report during the consultation exercise and explains how they have been taken into account. The key stages for the SEA for the Strategy are set out in table 3:

**Table 3: Main stages of the SEA process**

Stage	Activity
Scoping	Deciding on the scope and level of detail for the assessment and the consultation period. This is done in liaison with Scottish Natural Heritage (SNH) and the Scottish Environment Protection Agency (SEPA).
Assessment, mitigation & enhancement	Testing the contents of the Strategy as it is developed, identifying mitigation measures and looking at ways to enhance positive effects.
Environmental Report	Publishing an Environmental Report on the findings of the assessment and consulting on that report and the Strategy.
Adoption & monitoring	Providing information on the adopted Strategy, how consultation comments have been taken into account and methods for monitoring the significant environmental effects arising from its implementation.

A scoping report – outlining our proposed approach to our assessment – was issued to the Consultation Authorities (SNH & SEPA) for comment in November 2012. It was also issued to the various groups and individuals participating in the review workstreams. All respondents agreed with our overall approach and offered helpful comments, particularly regarding environmental data and issues, which we have taken into consideration during the course of the assessment. Copies of the responses returned during the scoping consultation can be found in Annex 2 of the Environmental Report.

In addition to the SEA scoping process, during early 2012, we carried out an initial stakeholder mapping exercise in order to identify key partners for the scoping phase of the project and as a result spoke with representatives of 33 organisations with an interest in the historic environment.

### **2.2 The assessment process**



We tested the draft vision and strategic priorities against a range of environmental topics to help predict the environmental effects of the Strategy. This is a common way of assessing the environmental effects of strategic plans, and helps to make the assessment systematic and consistent.

The first stage of our assessment focused upon a draft definition and vision for the historic environment in Scotland. This involved a review of descriptions employed across the United Kingdom and beyond, examining the benefits and disbenefits of each. Similarly, our consideration of a vision led on from the discussions around definition, examining the benefits and disbenefits of different approaches utilised elsewhere.

We then assessed the range of aims that were developed as a mechanism for delivering the draft vision. Finally, we assessed a series of strategic priorities that underpin these aims, looking in more detail at the likely significant effects of their implementation and any conflicts or mutually beneficial outcomes when considered across a range of other environmental outcomes. In doing so, we looked at whether the aims or actions **(a) achieve, (b) work towards / contribute to** or **(c) work against/obstruct** each environmental topic scoped into the assessment.

The findings of this are set out within section 5 and Annex 3 of the Environmental Report.

### **2.3 Integrating environmental considerations into the plan and taking account of the environmental assessment**

In addition to the key issues identified above, there were a number of more detailed comments provided on the Environmental Report (e.g. suggestions for mitigation measures and monitoring indicators) that have been taken into account in finalising the Strategy. These detailed comments are provided in Annex 1 of this report.

One of the key aims of the SEA process is to influence and inform the finalised version of the Strategy by integrating environmental considerations into its preparation. This has been achieved in the following ways:

- the nature and purpose of the Strategy is environmental in terms of its overarching vision to protect, conserve, promote and enhance the historic environment
- the vision, aims and objectives of the Strategy were developed in close consultation with environmental groups and agencies, incorporating wider environmental interests where relevant
- the draft aims and objectives were amended as part of an iterative process to incorporate the recommendations made during the assessment.
- the environmental assessment identified a series of recommendations, including the preparation of an action plan to help identify interdependencies and assist with delivery.

How these recommendations will be addressed is set out below.

As a high level document, the main aim of the Strategy is to provide an enabling framework for the whole historic environment sector to work collaboratively to identify issues and priorities for action. In order to realise this ambition, we have developed a governance structure that empowers and enables all those who have an interest in and who help shape the historic environment to drive forward the shared vision and strategy. The structure is as follows;

- An Overarching Strategic Board involving senior stakeholders, chaired by the Cabinet Secretary for Culture and External Affairs.
- An Operational Board charged with co-ordinating and managing activities identified across the Strategy.
- Support for specific tasks provided by a series of workstreams which can look at key areas and themes.

Successful delivery of the Strategy relies upon the collaborative participation of private individuals as well as government and third sector organisations. In light of this, to help align activity across the sector towards our common vision, various working groups are being set up under the strategic framework to collaboratively develop a programme of detailed priority actions in due course. These are as follows:

#### Joint Local and Central Government Workstream

This group is already meeting to consider how the historic environment can best be managed and maintained within the context of dwindling public resources; considering potential for existing and future delivery models; empowering local communities; and examining the potential for shared services.

#### Heritage Tourism Workstream

This group has been set up to consider how best to make full and effective use of our heritage assets to promote Scotland to domestic and international audiences and thus grow the overall value of heritage tourism in Scotland.

#### Education and Volunteering Workstream

We are at the early stages of setting up this group to explore scope for more join up across the sector and beyond; more effective measurement of impact; enhancing volunteering activity; and broadening access across the social spectrum. Early discussions with education/learning colleagues in the National Trust for Scotland and Royal Botanic Garden Edinburgh have been very positive and encouraging.

#### Measuring Success Workstream

This group will support the development of an inclusive and shared evidence framework which will measure our collective progress against the Historic

Environment Strategy and ultimately the success of the Strategy itself. The group will consider what success will look like, how we should go about measuring our collective success against the vision and how we will begin to identify collective roles and responsibilities within that process.

The recommendations identified during the environmental assessment have been passed to the Operational Board to take forward.

### **3. Conclusions**

#### **3.1 Reasons for choosing Strategy as adopted, in light of the other reasonable alternatives considered**

This section states why the Strategy is considered to have adequately considered environmental effects under SEA, outlines the process to monitor and review its environmental effects, and describes the environmental mitigation and monitoring that will be followed.

The Environmental Assessment (Scotland) Act 2005 requires that information is provided to explain the reasons for choosing the finalised Strategy in light of other reasonable alternatives. As noted in the Environmental Report, we approached the consideration of alternatives at various levels. As part of a wider review of policy, the decision was taken to develop this Strategy, from which a range of other alternatives were considered as part of its preparation – such as different visions, definitions and strategic aims and objectives.

The Strategy has been prepared in partnership with a range of stakeholders and the vision, aims, issues and objectives have been refined through this process. We considered alternative wordings for the vision, aims and objectives, and the environmental assessment has helped to inform the final version of the Strategy through making amendments to the draft objectives and incorporating particular objectives related to the SEA.

The majority of the objectives included in the Strategy are considered to have positive or neutral environmental effects. We acknowledge that a few of the objectives could have negative environmental effects, however, the scale and nature of any environmental effects is uncertain at this stage and will depend upon the implementation of the objectives.

Overall, we consider that the Strategy fulfils its purpose by providing a clear framework to deliver the agreed vision for the historic environment, and incorporates wider environmental issues as far as possible.

#### **3.2 Environmental mitigation and monitoring**

The final stage of the SEA process is to monitor the significant environmental effects of the Strategy. We did not identify any negative effects that require specific mitigation and monitoring, although we will monitor the delivery of the vision and strategic objective and actions for any unforeseen effects as part of the overall monitoring framework for the delivery of the Strategy.

## Annex 1: Detailed opinions expressed on the Environmental Report and how they have been taken into account

Question 13: Do you think that the strategic environmental assessment has identified the key issues associated with the environmental implications of the Strategy?	
Opinion expressed	Response
Threats posed by climate change and by economic situation.	<p>Noted.</p> <p>Both climate change and the economic situation have been recognised by the Strategy as posing significant challenges for the historic environment. The Environmental Report's baseline information went into some detail about the effects of climate change and adaptation in some detail. While we perhaps could have drawn this out more within the Environmental Report, we took the view that these topics were sufficiently covered within the draft Strategy.</p>
<p>The implications of removing the SHEP focus on Designations and Consents are not properly addressed.</p> <p>It is of particular concern that the built environment "evidence base" for the EA is the poor and rushed SHEA 2012 - with the high level of BAR (reduced to 8%) virtually ignored (compared to 3.9% in England). There is a distinct absence of data within the "Baseline Information" - not only of the condition of the historic environment and of the positive impact of retaining and reusing buildings (and embodied energy approach - notable by its absence in the Scottish Government sustainability targets) - but also of the expertise available (which HS is belatedly seeking to assess). A more robust annual SHEA is urgently required.</p>	<p>Noted.</p> <p>In relation to developing an evidence base, we already collect and collate fairly extensive data about the historic environment and how the sector is performing through the Scottish Historic Environment Audit (SHEA). We can build on this work going forward with key stakeholders, informed by the work of the various workstreams that have been or are</p>

<p>Further, it is surprising and disappointing that "no clear link" is posited for achieving the preventative approach suggested under "Care and Protect" Aim (C) - retaining and improving Material Assets. A successful "Care &amp; Protect" policy would reduce buildings on BARR and lead to an increase in historic assets retained. Equally - tackling derelict buildings which blight the local landscape or area would have positive benefits which are not identified - not least in retaining the embodied energy.</p> <p>Agree that in context of diminishing resources there is a need for a more explicit statement on how activities are to be prioritised. In widening the HE remit it is important not to undermine the importance of core buildings and areas.</p>	<p>in the process of being set up. The 'measuring success' working group, in particular, and the on-going work of the SHEA will inform the shape of a measuring success framework.</p> <p>The SHEP continues to be the Scottish Ministers' policy for the historic environment in Scotland. We will be considering the status of SHEP in light of the new Strategy and the recent Scottish Government consultations on Scottish Planning Policy and National Planning Framework 3 as well as the imminent policy on Architecture and Place-making and any other policies and guidance relevant to the historic environment.</p>
<p>The strategy is intended to cover the whole sector, not just the public sector elements of it, and should be assessed on this basis.</p> <p>As SMART actions with owners are developed, the SEA team will be better placed to assess impact.</p> <p>The baseline data on landscape should be extended to include SNH's landscape character assessment of Scotland and its regions - this is more relevant to the condition of the Historic Environment than the recent wild land mapping (interesting though it is).</p>	<p>Noted.</p> <p>While SEA applies to public sector plan preparation we acknowledge that the delivery of the Strategy is dependent, in some areas entirely dependent, upon private sector and community delivery. In many cases there will also need to be close collaboration between a range of interests. We accept that this could have been more explicit in our reporting of the findings.</p> <p>We agree that SNH's landscape character</p>

	<p>assessments are very helpful in understanding the condition of Scotland's historic environment, however, given the non-spatial nature of the Strategy we sought to highlight some of the key issues relating to landscape.</p>
<p>I think the SEA has a limited value within this exercise.</p>	<p>Noted.</p>
<p>The historic environment, and the built heritage in particular, needs to generally emerge much higher up the political 'food chain' given its impact on virtually every aspect of life. What is specifically missing in the Strategy is a key recognition that the built heritage originated from having access to using a wide range of traditional and indigenous building materials. To ensure its future wellbeing, there needs to be a more appropriate recognition of the range of these materials and their sourcing locations.</p> <p>Appropriate acknowledgement also needs to be given to allow future access to them to help ensure that their various characteristics, and the overall quality of the built environment, is not increasingly debased through the use of inappropriate alternatives e.g. Scottish slate has a distinctive performance and appearance that has defined the appearance and performance of innumerable buildings throughout the country. Yet, no Scottish slate has been in production for almost 70 years, with less suitable alternatives being used from as far afield as China and the Iberian Peninsula. This has resulted in a significant debasing of the appearance and performance of Scottish buildings. Similar issues apply to the previous range of building stones, and to the plethora of quality historic cast iron features that were used. Resolving these matters requires a greater understanding of the issues by policy makers, industry and professionals - particularly those in the Planning discipline.</p>	<p>Noted.</p> <p>We agree that access to a range of traditional and indigenous building material is an important factor; not only in terms of inappropriate alternatives, but the indirect effects associated with sourced materials from further afield.</p> <p>We agree that there would be a reduction in emissions associated with importing conservation building material. However, it is equally important that any potential negative effects associated with the methods employed in obtaining indigenous materials (e.g. slate and sandstone mining) are also fully considered.</p>
<p>To quote the academic and property consultant Donovan Rypkema, '100% of heritage conservation advances the cause of the environment...the loss of historic</p>	<p>Noted.</p>

<p>buildings is the polar opposite of sustainable development. Once they are gone they cannot possibly be available to meet the needs of future generations'.</p>	
<p>This seems thorough and the areas that NLS would be primarily be concerned with are addressed under Cultural Heritage and Population and Human Health.</p>	<p>Noted.</p>
<p>Pages 18-19 on Town Centres. General comment on this section is that IHBC would endorse most of the statement in the joint SPP/ NPF Environmental Report page 226 on Town Centres: Cultural Heritage issues, that; “Effects on the historic built environment may benefit from further consideration. The emphasis of the policy is on improving town centres by making use of existing buildings, and this could provide benefits. The current draft of the policy could make further reference to physical structure of town centres and cultural activities. A more robust approach could be to recognise the intrinsic cultural heritage value and importance of town centres and to use this as an asset upon which local distinctiveness and identity can be strengthened. There will also be a need to overcome constraints of the historic fabric in providing innovative approaches to town centre regeneration, and planning has a key role to play in this.” The exception to this endorsement policy is the final sentence above whose reference to the constraints of the historic fabric needing to be overcome, is unfortunate and not in line with latest government view elsewhere that the HE should be seen positively as an asset/ opportunity and NOT a constraint. Positive benefits from saving and refurbishing derelict buildings (as opposed to demolition &amp; rebuilding, or even just letting them deteriorate) should be highlighted, in terms of alleviating blight; assisting regeneration; and retaining embodied energy/ assisting carbon reduction goals.</p>	<p>Noted.</p> <p>The Strategy acknowledges the important role of the historic environment in helping to regenerate our historic town centres. It makes clear that the historic environment plays a key role in the regeneration of communities and advocates building on past successes to encourage more regeneration projects that build on a clear understanding of the inherent value of the historic environment. In line with one of the key priorities for action set out in the draft Strategy a collaborative working group has been set up, including the Scottish Government, COSLA and Local Authority and wider representation to look at how the historic environment can be best managed for example through existing arrangements within the planning system or community planning partnerships taking account of, for example, the Regeneration Strategy.</p>
<p>The current SEA appears to understand the draft Strategy to be primarily for the public sector to execute. The text in Section 2, Background to the Strategy,</p>	<p>While SEA applies to public sector plan preparation we acknowledge that the</p>

<p>Paragraph 1 makes reference only to public sector organisations (though not the Royal Commission). This is reflected in the text on “High Level Alternatives” in Section 4 which considers only public resources – the great majority of historic environment ownership sits outside of government.</p> <p>The text on landscape in Annex 1: Baseline information could be strengthened by reference to SNH’s landscape character assessment reports, a comprehensive exercise covering the whole of Scotland and which incorporates archaeological and built heritage features. The text should also reference Scotland’s World Heritage Sites and the National Performance Framework. The current SEA was written before the policy functions of Historic Scotland were relocated to the Culture and Heritage Directorate of the Scottish Government. Annex 3 needs to be updated to reflect this shift in roles and responsibilities.</p> <p>The current text in Annex 3 reflects the fact that Historic Environment Strategy is still in draft form. As specific actions are developed, and responsibilities assigned, the evaluators will be able to make a more informed assessment of the environmental impacts of the Strategy. In our view, the text in this section does not currently give due recognition to the contributions that a well-cared for historic environment can make to individual and community wellbeing.</p>	<p>delivery of the Strategy is dependent, in some areas entirely dependent, upon private sector and community delivery. In many cases there will also need to be close collaboration between a range of interests. We accept that this could have been more explicit in our reporting of the findings.</p> <p>We agree that SNH’s landscape character assessments are very helpful in understanding the condition of Scotland’s historic environment, however given the non-spatial nature of the Strategy we sought to highlight some of the key issues relating to landscape.</p> <p>Noted. We agree that a well-cared for historic environment can and does make a significant contribution to community well-being.</p>
<p>Again the impact of using indigenous materials for the repair and maintenance of the built historic environment has not been approached. This is particularly relevant to the environmental implications of the strategy. Obtaining traditional building materials uses less energy and has a lesser impact on the environment than extraction and processing of contemporary building materials. Additionally obtaining traditional building materials can have a long term positive environmental impact. Transportation over smaller distances than non-indigenous materials would also have a positive environmental implication globally. By expansion traditional materials used for contemporary construction can have a positive environmental implication. Arguably using them for new-build could have a preferable visual impact too. Using them would</p>	<p>Noted.</p> <p>We agree that access to a range of traditional and indigenous building material is an important factor; not only in terms of inappropriate alternatives, but the indirect effects associated with sourced materials from further afield.</p> <p>We agree that there would be a reduction</p>



<p>consolidate the link between our rich geodiverse landscape and human activity.</p>	<p>in emissions associated with importing conservation building material. However, it is equally important that any potential negative effects associated with the methods employed in obtaining indigenous materials (e.g. slate and sandstone mining) are also fully considered.</p>
<p>Will require a continuing vigilance to see that no part of the current structures are disadvantaged in the process.</p>	<p>Noted.</p>
<p>Yes, but perhaps the document is too ambitious. The whole strategy needs to be looked at deeper with respect to the available resources that can be ploughed into Historic Environment projects.</p>	<p>Noted.</p> <p>The Strategy is not about imposing new burdens that will require additional financial support. The aim of the Strategy is to provide an enabling framework that will allow the sector to work collaboratively to identify issues and align priorities for action. The Strategy will ensure that in a difficult financial climate we are able to allocate resources confidently knowing that it will lead to positive outcomes and is achieving collective priorities. The strategic framework will also ensure that decisions can be taken in an informed way and at the right level across the whole historic environment sector.</p>
<p>More tourism needs more infrastructure - public transport etc. in remote areas</p>	<p>Noted.</p> <p>We agree that tourism and associated</p>

	<p>infrastructure (and the many benefits that this can bring in term of increasing access and understanding) needs to be balanced with the impacts this can have on the historic environment.</p>
<p>Policy application and support through to local authority level needs strengthening.</p>	<p>Noted. We agree that robust application of policy, and the monitoring of its effectiveness, is crucial for the management of the historic environment.</p> <p>A number of high level actions have already begun to be taken forward to kick start the delivery of the Strategy and in line with one of the key priorities for action set out in the draft Strategy a collaborative working group has been set up, including the Scottish Government, COSLA and Local Authority and wider representation to look at how the historic environment can be best managed for example through existing arrangements within the planning system or community planning partnerships taking account of, for example, the Regeneration Strategy.</p>
<p>The current SEA was written before the policy functions of Historic Scotland were relocated to the Culture and Heritage Directorate of the Scottish Government</p>	<p>The move of the policy functions of Historic Scotland to Culture and Heritage Directorate within The Scottish Government was a procedural step to assist with mainstreaming the historic</p>

	<p>environment across a range of national plans and initiatives.</p> <p>This move formed part of our thinking and assessment of the benefits associated with mainstreaming the historic environment more generally.</p>
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