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HES RESPONSIBLE TOURISM FRAMEWORK

CONSULTATION ANALYSIS & REPORT

MARCH 2023

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INTRODUCTION

Background to the consultation

The HES Responsible Tourism Framework has been developed to define the organisation's understanding of, and role in, responsible tourism. It outlines the principles guiding Historic Environment Scotland's (HES) decision-making and sets out how tourism in the historic environment can contribute to better quality of life and meaningful experiences for all.

As Scotland's lead public body for the historic environment and the largest operator of paid-for visitor attractions, HES has a responsibility to show leadership in the just transition to a low carbon economy. HES's commitment to responsible tourism is rooted in the HES Corporate Plan – Heritage for All. Responsible tourism is also a key part of the HES Climate Action Plan 2020-2025, which sets out, across seven themes, how the organisation will place the environmental impact of its activities at the heart of decision-making. As well as highlighting the approach to properties in care (PICs), the Framework will also cover HES's work with partners and other stakeholders on responsible tourism related activities and has the potential to serve as inspiration for the wider historic environment and tourism sector.

Following extensive internal engagement, we held a public consultation on the draft HES Responsible Tourism Framework between 28th September and 30th November 2022.

What is the purpose of this report?

The purpose of this report is to outline the findings of the consultation exercise between 28th September and 30th November 2022 on the draft HES Responsible Tourism Framework and explain how we have taken these views into account.

The first part of this report (A) analyses and summarises the views expressed during the public consultation and related engagement activities that took place between 28th September and 30th November 2022. The second part of this report (B) describes what changes we have made to the Framework in light of this feedback.

The following chapters document the substance of our analysis and present the main views expressed in responses. The consultation questions are included in Appendix 1.

PART A – CONSULTATION ANALYSIS

1. APPROACH TO CONSULTATION

1.1 How did we distribute and advertise the consultation?

The consultation on the draft HES Responsible Tourism Framework was distributed as an online survey consisting of 22 questions. The survey was hosted by the Citizen Space online platform. A list of questions asked is provided in Appendix 1.

A notification about the survey was sent to:

- The Herald
- Existing contacts of those already engaged with the Responsible Tourism Coordinator
- Public bodies and agencies
- The Built Environment Forum Scotland (BEFS), who included the notice in their newsletter.

The consultation was also promoted on social media (LinkedIn and Facebook) and was available to view on the current consultations section of the HES website.

1.2 How did we encourage participation?

Those notified about the consultation were encouraged to complete the online questionnaire. The survey was also provided in other formats upon request (e.g. as PDF and Word documents).

Historic Environment Scotland staff also promoted the consultation during the course of their engagement with stakeholders in other contexts.

1.3 How did we analyse the responses?

Comments given in response to each question were examined and main themes, similar issues raised, or observations made in a number of responses, were identified. In addition, we looked for sub-themes such as reasons for opinions, specific examples or explanations, alternative suggestions or other related comments.

Some questions contained an agree/ disagree scale tick box option to allow respondents to indicate their response (typically ranging on a 5-point scale from strongly agree to strongly disagree). Results from these questions are presented in graph format. Where respondents did not use the questionnaire format for their responses but indicated within their text their answer to one of the closed questions, these have been included in the relevant count.

The main themes were then looked at in relation to respondent groups to ascertain whether any particular theme was specific to one particular group (e.g. local authorities, private businesses), or whether it appeared in responses across groups. When looking at group differences however, it must be borne in mind that where a specific option has been identified in relation to a particular group or groups, this does not indicate that other groups

do not share this opinion, but rather that they have simply not commented on that particular point.

The following sections of this report document the substances of the analysis and present the main views expressed in responses. Sample quotes have been included to illustrate a range of views expressed.

2. EXECUTIVE SUMMARY

This section describes how many responses were given to the consultation, respondent group information and a summary of views expressed. This includes a combination of statistical information and emerging key themes.

2.1 How many responses did we receive?

We received 17 responses to the survey.

The consultation online survey included a list of organisations and individual groups, and respondents were asked to tick the group most appropriate for themselves or for their organisation. These sub-groups of organisation type were used to enable analysis as to whether differences, or commonalities, appeared across the various different types of organisations and/ or individuals that responded.

As can be seen in the following table, the groups with the largest number of respondents (7) were individuals and organisations, public bodies or charities, followed by private business (2) and local authorities (1). There were no respondents in community groups.

Respondent group	No. of responses	Percentage of responses
As an individual	7	41.3%
On behalf of an organisation, public body or charity	7	41.3%
As a private business, such as architect or developer	2	11.8%
On behalf of a local authority	1	5.9%
Representing a community group	0	0%
Not disclosed	0	0%
TOTAL	17	100%

While the consultation gave all those who wished to comment an opportunity to do so, given the self-selecting nature of this type of exercise, any figures quoted here cannot be extrapolated to the wider population.

The following paragraphs highlight the main themes that emerged in relation to each question posed in the consultation document.

2.2 What did people say?

Overall, there appears to be relatively broad support for the draft Framework. Typically, more respondents agreed than disagreed with the statements relating to the priority areas, outcomes and aspirations. There are mixed views regarding the relevancy of each to respondents.

The majority of respondents (62.5%) agreed that the draft Framework was ambitious, but achievable. Analysis of the comments associated with the question relating to the draft Framework's level of ambition indicate that there were concerns regarding sufficient resources, and support from Scottish Government for delivery. Further, some respondents highlighted a lack of clarity on prioritisation and timeframe.

81.25% of respondents considered HES's role with respect to responsible tourism clearly or very clearly expressed in the draft Framework, but some asked for more detail on how HES will support others as part of delivery of Our Responsibility for Capacity Building.

Responses to the question relating to the clarity of language used in the draft Framework indicated that 87.5% of respondents agreed it was either clear or very clear. The glossary was highlighted as useful, and one respondent suggested an additional item to be included in the glossary.

Priority areas: There was strong agreement for all the statements relating to priority areas, with relatively few respondents disagreeing or strongly disagreeing with those identified. 29.4% of respondents have taken the opportunity to provide further comments in relation to their view.

Outcomes: Respondents were asked to review the outcomes that had been provided in relation to the priority areas, Our Responsibility for the Environment, Our Responsibility for People and Our Responsibility for Capacity Building. The majority of respondents either strongly agreed or agreed with the outcomes for each of these.

Aspirations: Similarly, the majority of respondents supported the aspirations relating to the outcomes, although a few gaps were identified, and respondents provided suggestions on how to strengthen the aspirations.

2.3 What did people say about the impact assessment?

During the preparation of the draft HES Responsible Tourism Framework, a strategic environmental assessment (SEA) was undertaken. One respondent did not provide any opinion on the impact assessment.

When asked 'has our environmental assessment identified the likely environmental effects of the options?' the majority of respondents agreed.

When asked 'do you think there are any additional mitigation, enhancement or monitoring measures that should be considered?', the majority of respondents agreed and provided comments.

3. ANALYSIS OF RESPONSES

Questions 1-3 related to personal information about those completing the survey (name, organisation, etc.), including the privacy notice, and are not summarised here. Respondent information is set out above at section 2.1 and illustrates the return rates in relation to each group.

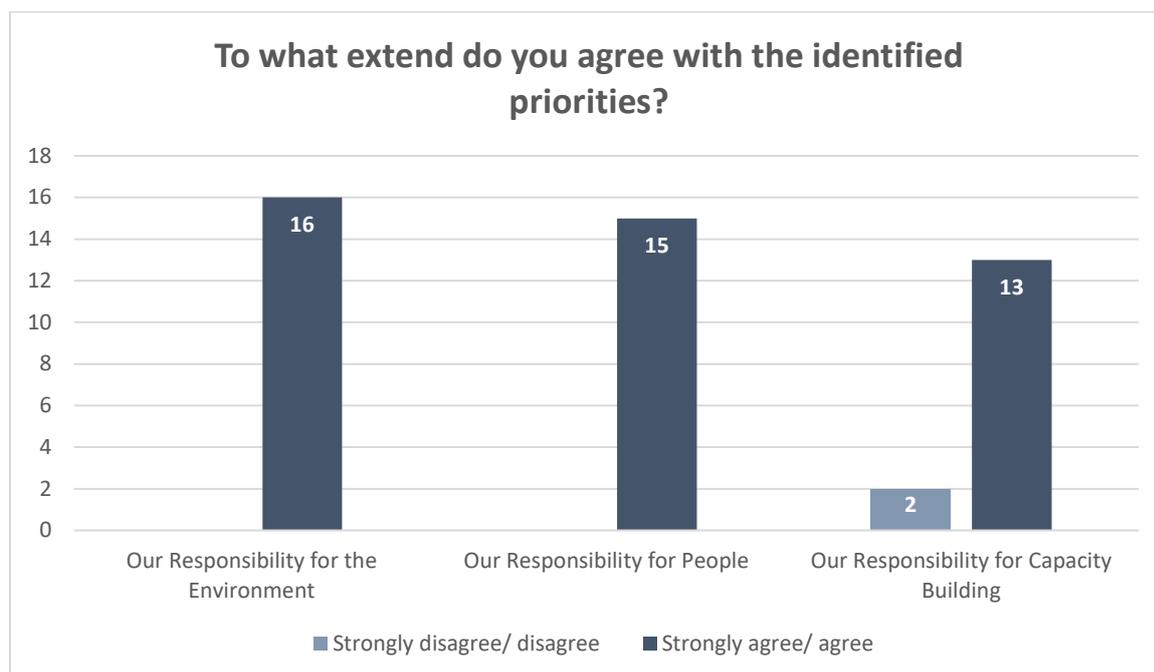
3.1. Priority areas

The HES Responsible Tourism Framework identified three priority areas for effective action. Question 4 asked to what extent respondents agree or disagree with the identified priority areas (Strongly disagree, Disagree, neither agree nor disagree, Agree, Strongly agree).

- Our Responsibility for the Environment
- Our Responsibility for People
- Our Responsibility for Capacity Building

Respondents were also invited to provide additional comments on this question.

The graph below, which removes those who have expressed no view, indicates that the majority of respondents either agree or strongly agree with the identified priority areas.



Some respondents (29%) have made comments about this section or identified variations of those priorities provided, which they considered should be included. Examples include:

Our Responsibility for the Environment: “We agree with the priority areas as set out on p11. However, we believe that the first priority must be ‘Our Responsibility for the Heritage Asset’. This may be implicitly implied in ‘Our Responsibility for the Environment’, but we

think it is so important that it needs to be stated explicitly as without the heritage asset, there will be no heritage tourism.” (Organisation, public body, or charity)

Our Responsibility for Capacity Building: “We would also like to see included as a leading principle under 3 'Our Responsibility for Capacity Building' that, as well as providing guidance, it also commits to supporting the historic environment sector in implementing responsible tourism practices”. (Organisation, public body, or charity)

General: “Working in partnership crucial for all 3 priorities.” (Organisation, public body, or charity)

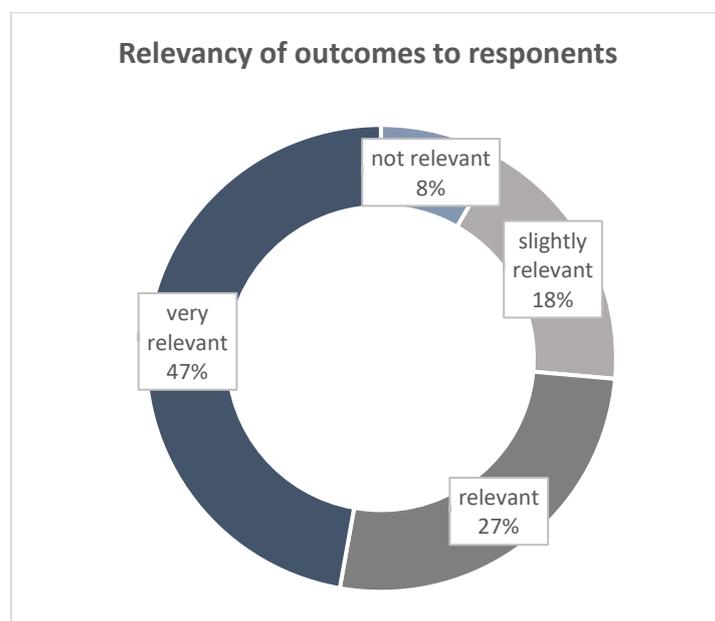
General: “Needs and limits are reflected, but justice (inter-generational and international) is not well reflected in these, although granted they are headlines.” (Private business, such as an architect or developer)

3.2. Outcomes

The subsequent questions in the consultation related to the draft outcomes and their relevancy to respondents. Respondents were asked to review the outcomes that had been provided in relation to:

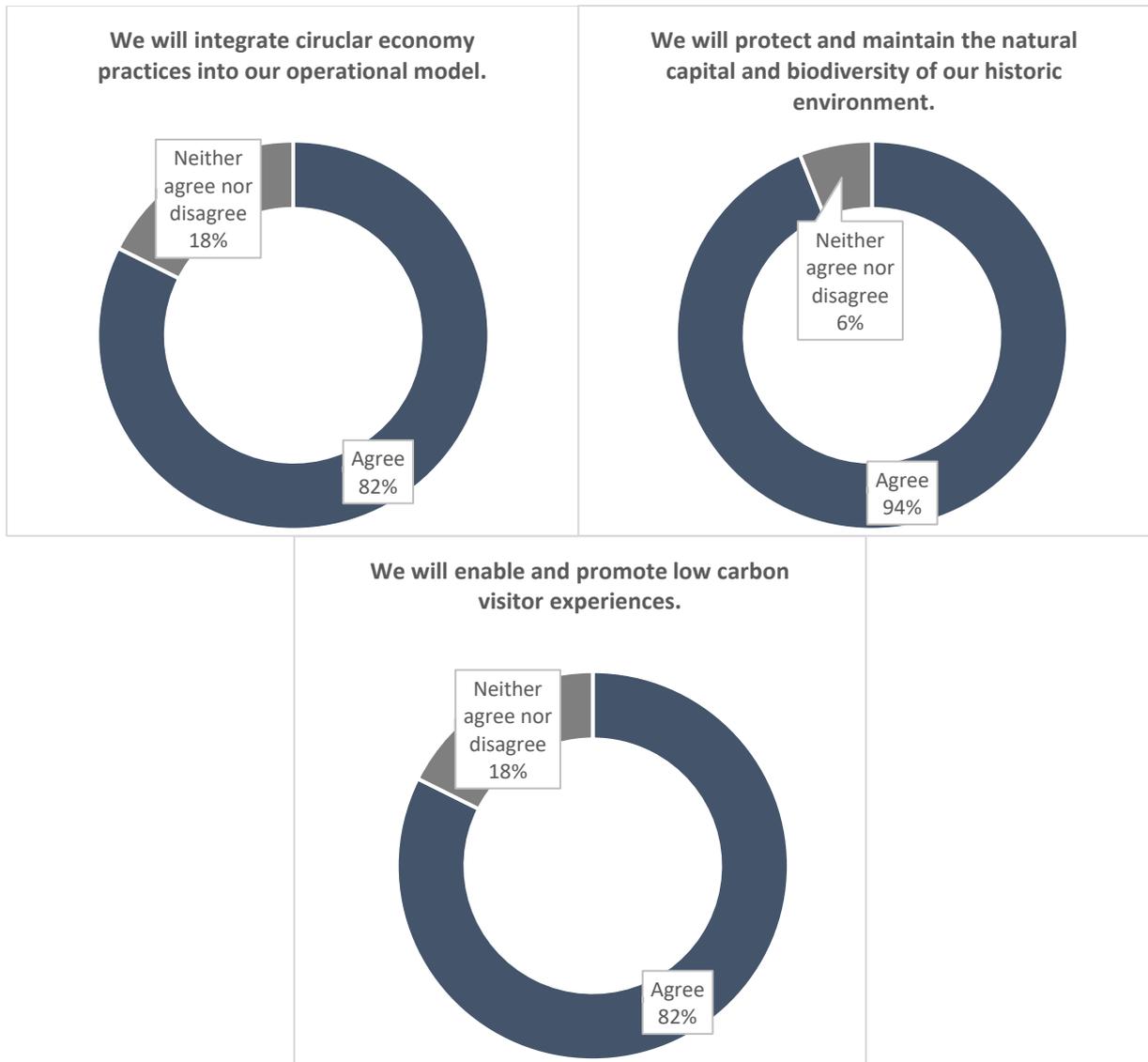
- Our Responsibility for the Environment
- Our Responsibility for People
- Our Responsibility for Capacity Building

The majority of respondents either agreed or strongly agreed with the draft outcomes and, as the below graph shows, indicated they were either slightly relevant (18.1%), relevant (26.4%) or very relevant (47.2%).

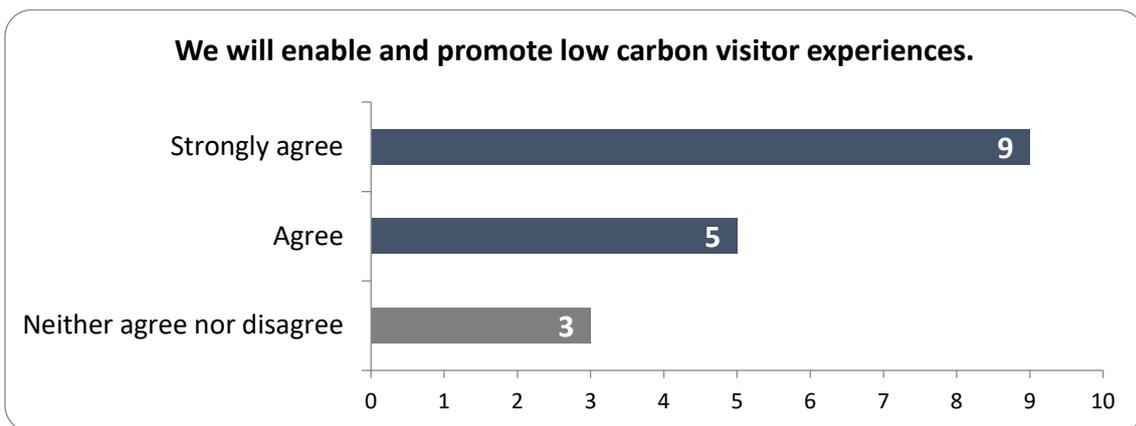
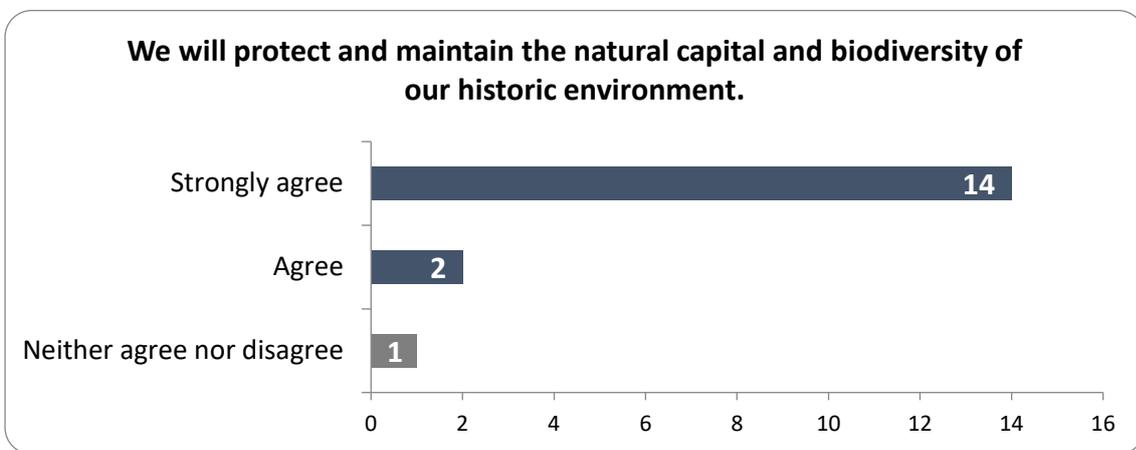
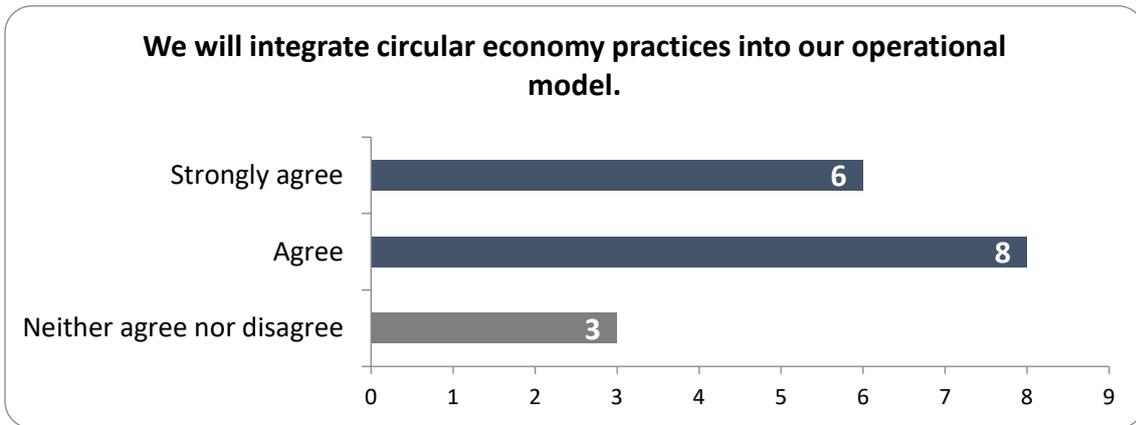


3.2.1. Our Responsibility for the Environment

Responses to the priority area 'Our Responsibility for the Environment', indicated that for each outcome over 80% agreed.

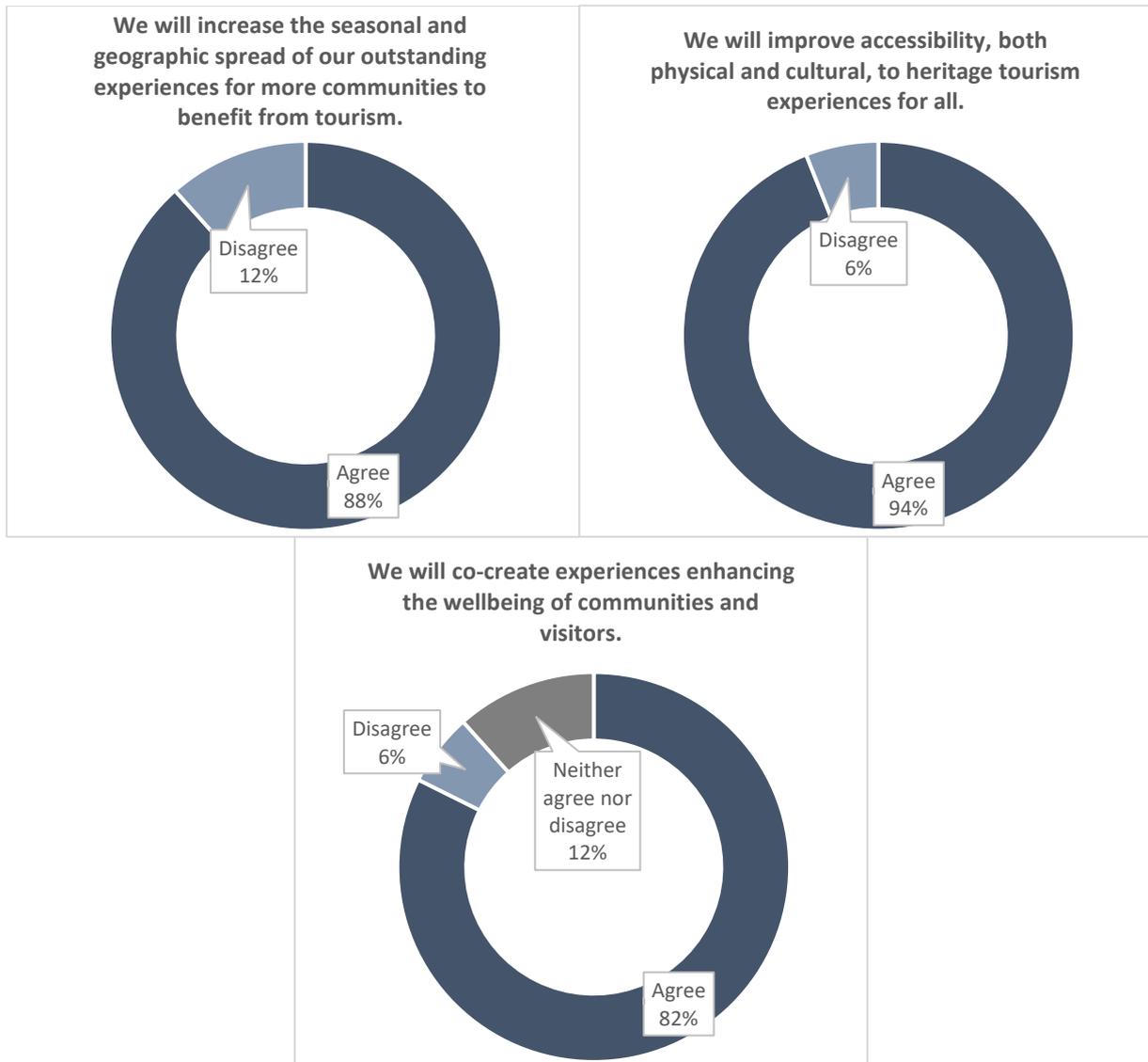


The following graphs provide a full breakdown of all responses to outcomes under Our Responsibility for the Environment:

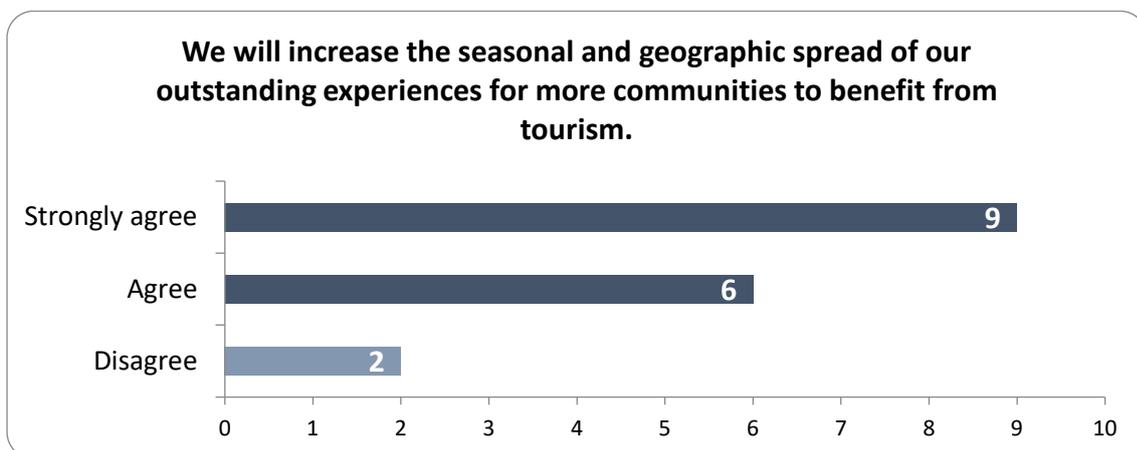
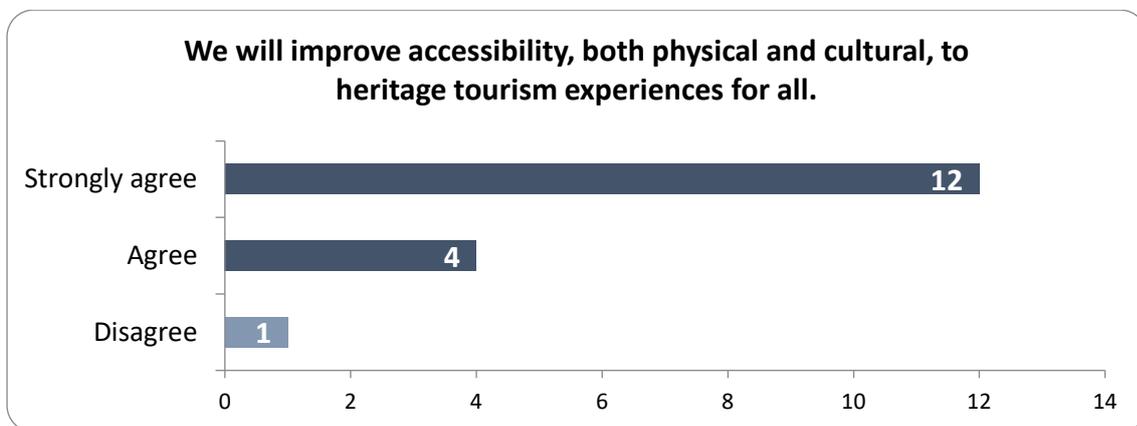
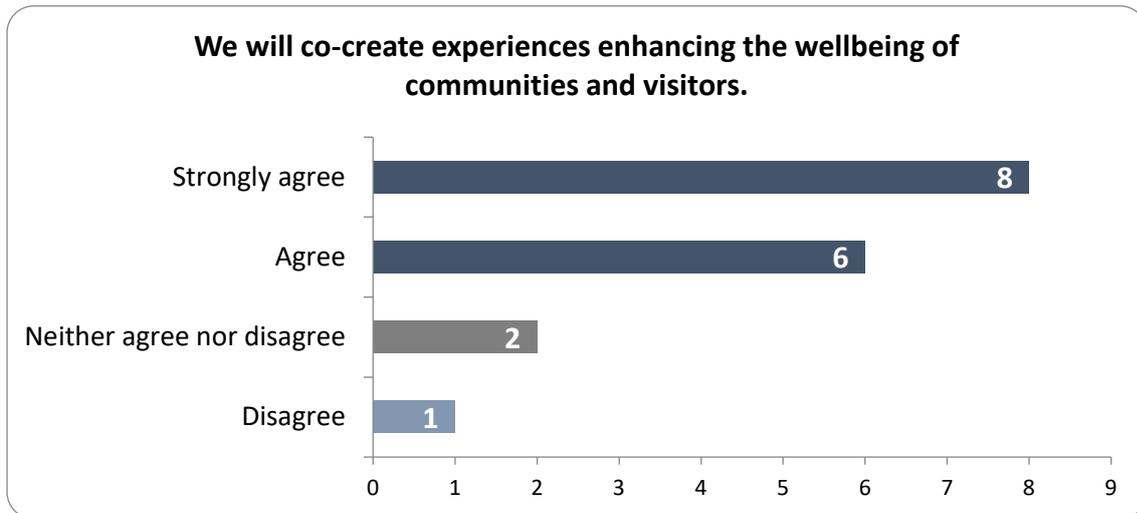


3.2.2. Our Responsibility for People

Responses to the priority area 'Our Responsibility for People', indicated that for each outcome over 80% agreed.

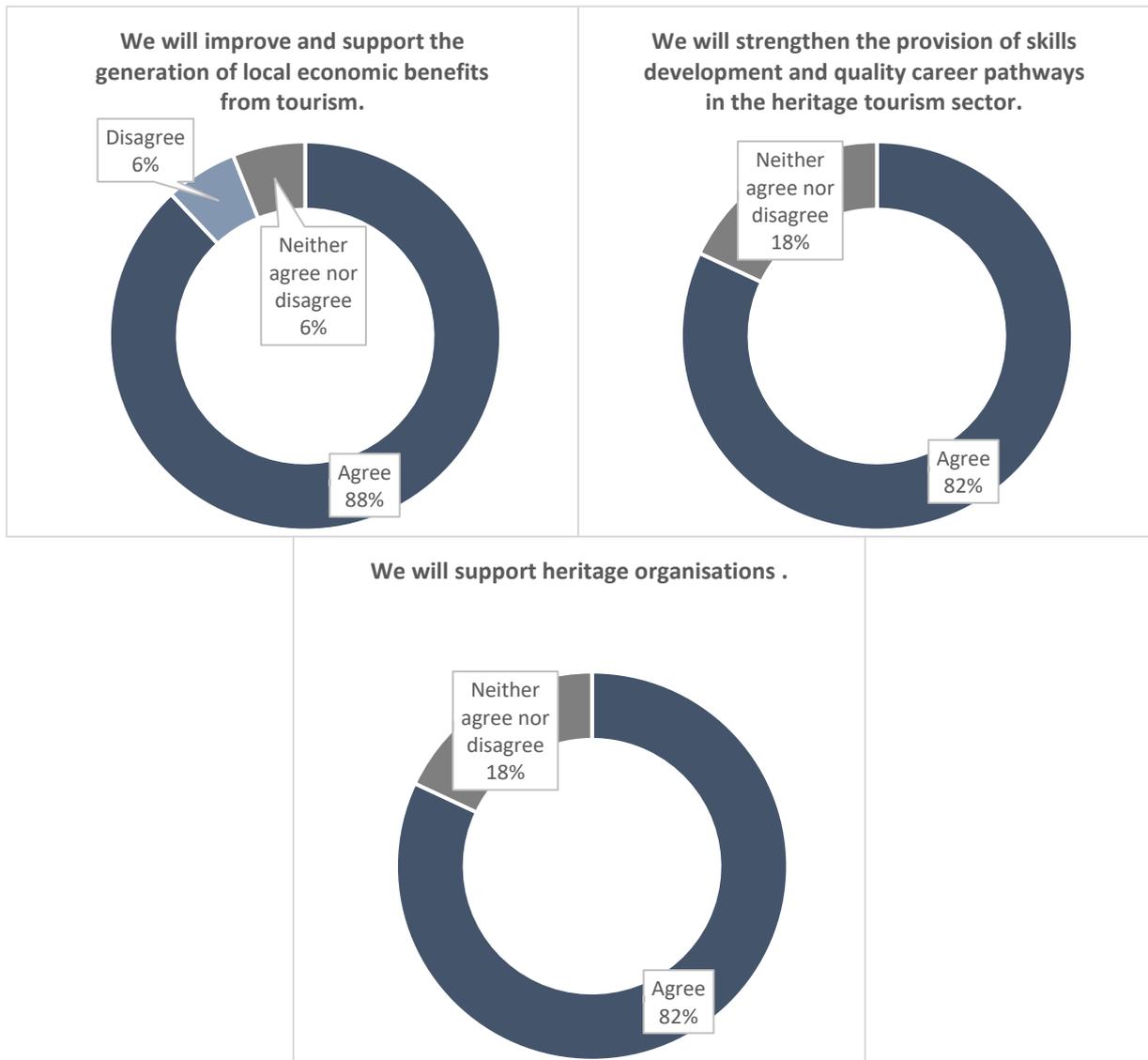


The following graphs provide a full breakdown of all responses to outcomes under Our Responsibility for People:

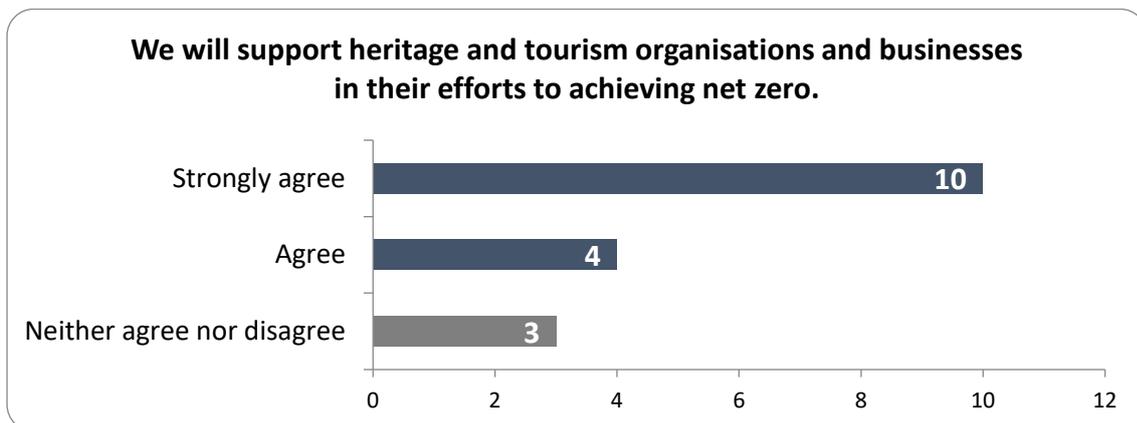
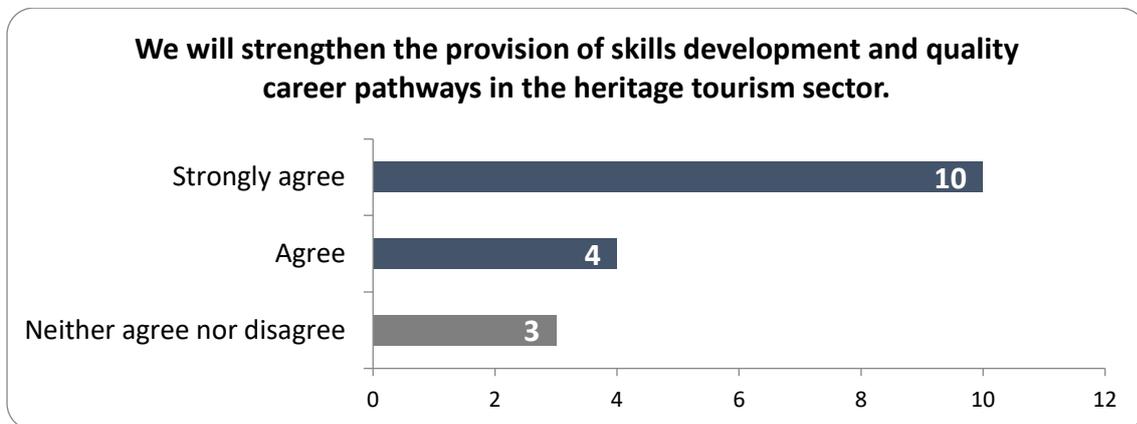
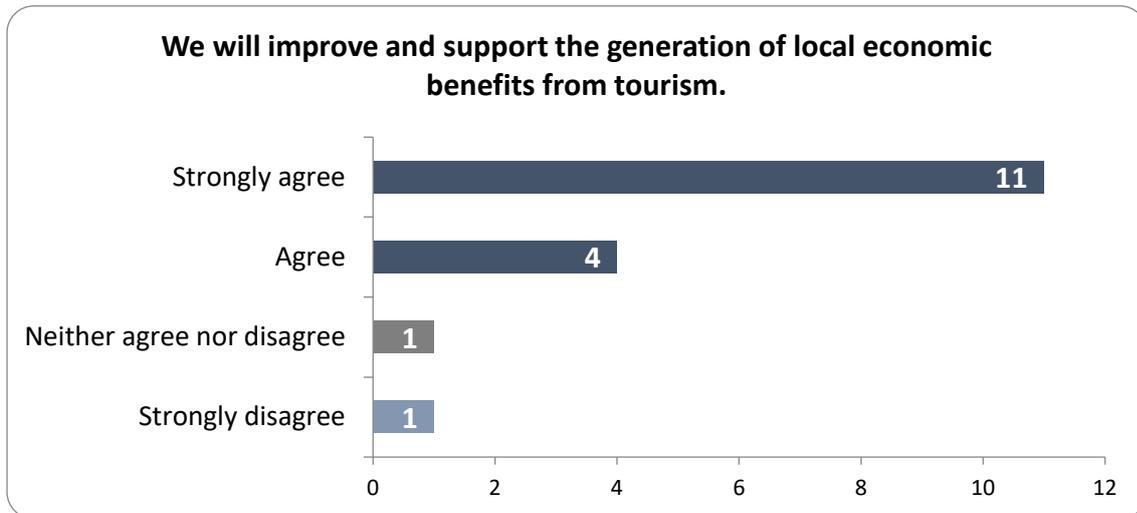


3.2.3. Our Responsibility for Capacity Building

Responses to the priority area 'Our Responsibility for Capacity Building', indicated that for each outcome over 80% agreed.



The following graphs provide a full breakdown of all responses to outcomes under Our Responsibility for Capacity Building:



3.2.4. Summary of comments on draft outcomes

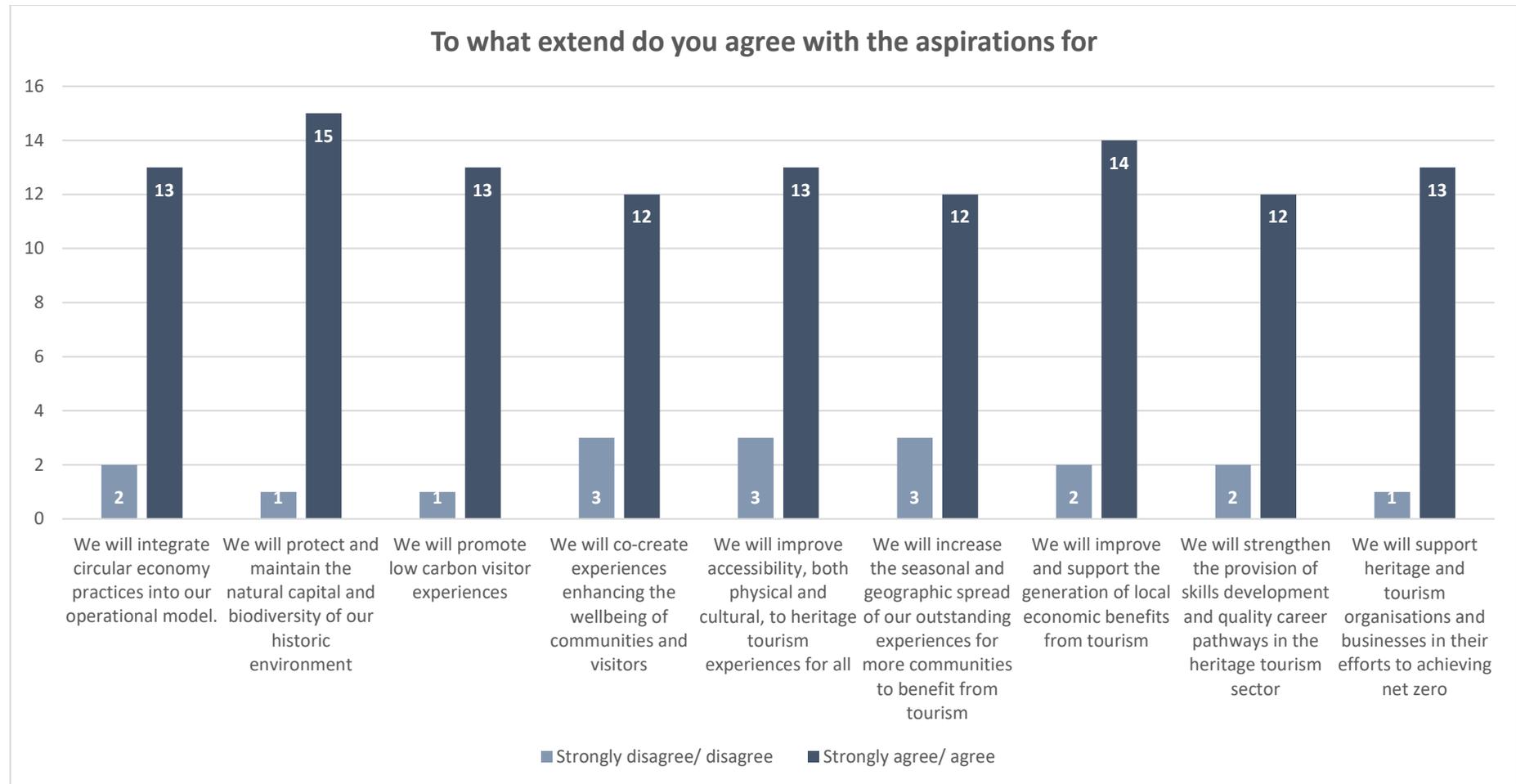
Respondents were invited to comment on the draft outcomes. Suggestions included:

- **General:** “We suggest the first outcome must be to protect and enhance our built and cultural heritage. Without protecting the very thing that visitors have come to see, experience and enjoy, tourism is unlikely to be responsible because it is unlikely to be sustainable, certainly in the longer term.” (Organisation, public body, or charity)
- **General:** “Important to remember emissions from visitor travel are part of destinations' emissions profiles. Also, how to make sure this is not just a 'to do' list, and/or how relates to e.g. UNWTO Code of Ethics or GSTC standards.” (Private business, such as an architect or developer)
- **We will protect and maintain the natural capital and biodiversity of our historic environment:** “We would like to see ‘maintain’ replaced with ‘enhance’ – ‘We will protect and enhance the natural capital and biodiversity of our historic environment’. The natural heritage that surrounds and inhabits our historic environment is a critical element of the whole visitor experience quite apart from the ecosystem services it provides and it needs to be recognised as such. It is therefore in all our best interests that the natural capital and biodiversity of our historic environment is not just maintained but enhanced. Historic sites such as Gardens & Designed Landscapes, and battlefields, can be important repositories of biodiversity, as well as valued landscapes.” (Organisation, public body, or charity)
- **We will improve accessibility, both physical and cultural, to heritage tourism experiences for all:** “It is good to see that ‘cultural’ accessibility has been included. Does this include intellectual access for those with learning disabilities? If not, we would like to see this included e.g. ‘We will improve accessibility, physical, intellectual and cultural, to heritage tourism experiences for all’.” (Organisation, public body, or charity)
- **We will improve accessibility, both physical and cultural, to heritage tourism experiences for all:** “The Framework rightly aims to “improve accessibility, both physical and cultural, to heritage tourism experiences for all”. That includes Gaelic speakers and the increasing number of learners and overseas visitors with an interest in the language who will be attracted to HES sites by the use of Gaelic. Some of them will represent “new audiences” to which the Framework refers.” (Organisation, public body, or charity)
- **We will improve and support the generation of local economic benefits from tourism:** “That can be achieved by HES using Gaelic as an economic asset and a draw for visitors.” (Organisation, public body, or charity)

- **We will increase the seasonal and geographic spread of our outstanding experiences for more communities to benefit from tourism:** “This should be for the benefit of visitors as well as for the benefit of communities.” (Organisation, public body, or charity)
- **We will increase the seasonal and geographic spread of our outstanding experiences for more communities to benefit from tourism:** “This will benefit many Gaelic speaking communities where tourism is very seasonal. An increased geographical spread of visitors will help smaller/less well-known Gaelic speaking communities to benefit from tourism.” (Organisation, public body, or charity)
- **We will support heritage and tourism organisations and businesses in their efforts to achieving net zero:** “Under the final Outcome about the support HES will provide heritage and tourism organisations and businesses, we welcome the commitment to support those in the sector achieve net zero. We would also like a commitment to supporting those in the sector move to a business model that embraces the principles of responsible and sustainable tourism.” (Organisation, public body, or charity)

3.3. Aspirations

The draft Responsible Tourism Framework hosts a series of aspirations set out under each outcome. In question 7, respondents were asked to indicate to what extent they agree with the aspirations grouped by the outcome they sit under. The graph below removes those who have expressed no view.



Some respondents (29%) have made comments about this section or identified variations of the aspirations provided, which they considered should be included. Examples include:

- Nothing about supporting people on low income to participate and encourage active enjoyment of the built environment – this is something we could work with you on through our social tourism activity. (Organisation, public body, or charity)
- All the aspirations set out are to be supported. In terms of developing experiences based on visitor data, there would also be benefit in looking at who is not visiting and understanding why, so that experiences can be developed that engage and inspire this sector of the visitor market also. Adequate investment in proactive visitor management should ensure quality experiences for visitors and also identifying and limiting any conflicts that might arise with local communities. (Organisation, public body, or charity)
- We are particularly pleased to see recognition of the need to strengthen the provision of skills development and quality career pathways in the heritage tourism sector. This is a major issue for the sector and we welcome its inclusion here. (Organisation, public body, or charity)
- We also welcome HES's commitment to working with heritage and tourism organisations and businesses in their efforts to achieve net zero. Achieving net zero is critical for all involved in the sector and HES' commitment to providing financial support as well as working with the sector will be important to galvanising and enabling action. (Organisation, public body, or charity)
- Volunteers are crucial to the maintenance and running of many heritage visitor attractions, and the benefits of volunteering to the health and wellbeing of individuals and communities, is well known. There is a brief reference to volunteering under 'Our Responsibility for People'. Perhaps it should also be included in 'Our Responsibility for Capacity Building'. (Organisation, public body, or charity)

PART B – CONSULTATION REPORT AND SEA STATEMENT

4. APPROACH TO FINALISING THE FRAMEWORK

This section describes how we have taken the views expressed during consultation into account in finalising the Framework.

4.1 How have views and information been taken into account?

Each consultation comment was reviewed by the HES Responsible Tourism Framework drafting team to consider how it may influence changes to the draft Framework. Changes were made to address relevant consultation comments. A final draft of the Framework was agreed by the HES ELT in preparation for copy editing and publication.

4.2 Editing and drafting changes to the HES Responsible Tourism Framework – post consultation

We have taken responses to the public consultation on board and made appropriate edits to cover the requested elements as follows.

4.2.1 Chapter headers

Gaelic translations have been added for the chapters.

4.2.2 Priority areas

While there was broad support for the priority areas identified, one edit has been made. ‘Our Responsibility for the Environment’ has been renamed ‘Our Responsibility for the Historic Environment’ to clarify it covers built and cultural heritage assets, as well as the natural environment.

4.2.3 Outcomes

Outcome 2 of ‘Our Responsibility for the Environment’ has been rewritten to reflect the outcome of the SEA and take account of consultation responses.

Outcome 2 of ‘Our Responsibility for People’ has been edited to include ‘intellectual’ and ‘cognitive’ accessibility. Footnotes to define the terms in the context of the document have been added.

Outcome 3 of ‘Our Responsibility for Capacity Building’ has been reworded to reflect a commitment to supporting others in their efforts to move to responsible tourism practices.

4.2.4 Aspirations

Clear references to the Gaelic language and Gaelic communities have been added to aspirations across the Framework. Two new aspirations were added in response to gaps identified through the consultation.

4.2.5 New chapter: Measuring Progress

In response to a request by HES ELT, a new chapter has been added outlining how progress on delivery of the Framework will be measured.

4.2.6 Glossary

The glossary has been updated. Definitions/ terms that have been addressed as highlighted by consultation feedback include:

- historic environment (explicit mention that this includes the Gaelic language)
- circular economy
- cognitive and intellectual accessibility

4.3 Other issues raised

Some respondents highlighted a lack of clarity on prioritisation and the timeframe of the Responsible Tourism Framework. The framework is intended to be dynamic and will be updated in order to respond to the rapidly evolving nature of the topic, to reflect ongoing development and our growing understanding in the field of responsible tourism. The approach taken at individual sites can be aligned with existing prioritisation tools, such as the OPiT Sustainable Investment Toolkit (SIT).

5. STRATEGIC ENVIRONMENTAL ASSESSMENT STATEMENT

5.1 Introduction

The Environmental Assessment (Scotland) 2005 Act (hereafter referred to as the 2005 Act) requires public bodies in Scotland to carry out a Strategic Environmental Assessment (SEA) on certain plans, programmes and strategies. SEA is a way of examining plans as they develop and to identify any significant effects they may have on the environment. It ensures that environmental considerations are taken into account and, where required, proposes mitigation measures to avoid or minimise any potentially significant adverse effects on the environment. In doing so, SEA aims to:

- integrate environmental factors into plan preparation and decision-making;
- improve plans and enhance environmental protection;
- increase public participation in decision making; and
- facilitate openness and transparency.

The Environmental Report which documented the potential significant effects of the draft HES Responsible Tourism Framework was made available for consultation alongside the draft Framework itself. The SEA was taken forward by the team within HES which was responsible for preparing and consulting upon the Framework.

This post adoption statement forms the final output from the SEA process and is required under the 2005 Act. It will outline how the findings of the SEA and the views of consultees have been taken into account in the development of the drafting of the final HES Responsible Tourism Framework.

5.2 Structure of this Post Adoption Statement

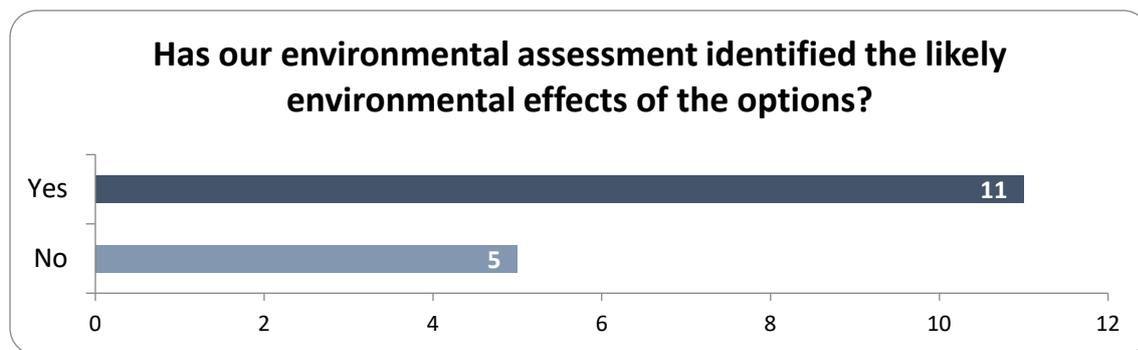
Section 18(3) of the 2005 Act sets out the information that should be included in this SEA Statement. In summary, it should include:

- how the environmental considerations have been integrated into the plan, policy, programme or strategy;
- how the Environmental Report has been taken into account;
- how the opinions expressed by consultees have been taken into account;
- the reasons for choosing the plan, policy, programme or 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 plan, policy, programme or strategy.

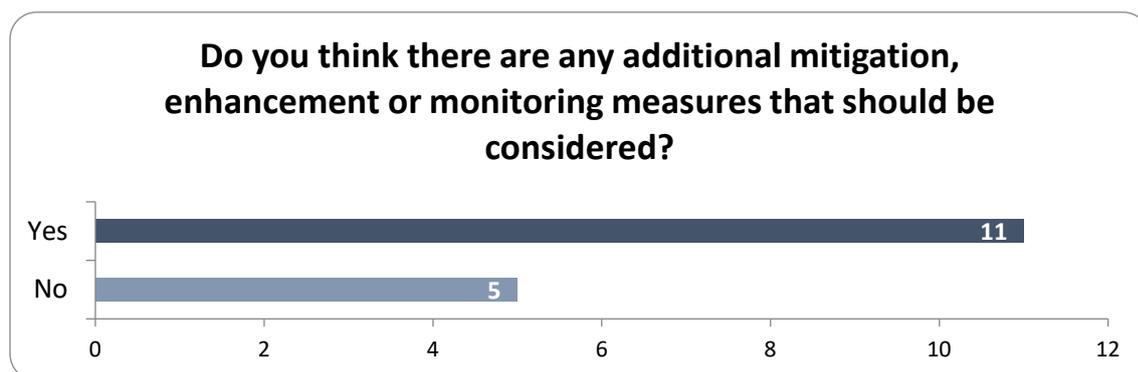
5.3 Opinions expressed during the consultation

Section 4 of this report sets out how the views of consultees on the draft HES Responsible Tourism Framework have been taken into account in finalising the Framework. We also invited views on the environmental assessment.

When asked ‘has our environmental assessment identified the likely environmental effects of the options?’ the majority of those who responded agreed.



When asked ‘Do you think there are any additional mitigation, enhancement or monitoring measures that should be considered?’ 68.75% of respondents agreed.



Several respondents opted to provide further commentary when asked ‘Has our environmental report identified the likely environmental effects of the options?’. in support of their response.

Consultee comment	How has the comment been taken into account?
Yes and clearly to the best of my understanding.	Noted with thanks.
Thorough examination of activities is in place.	Noted with thanks.
It only looks at usage in Scotland. There’s huge issues on the extent of travel to Scotland worldwide.	Domestic and overseas travel related emissions are considered within the Environmental Report under the Climatic Factors topic.
Concentrates very much on the ecological aspects (net zero is NOT actually attainable without carbon offsetting, which is a deceptive measure).	Net zero related aspirations were assessed against SEA objectives for all scoped in topics.
Covers ground sufficiently.	Noted with thanks.
Very thorough and well thought through assessment.	Noted with thanks.

<p>How you are measuring the impact must be clearly defined.</p>	<p>Noted. Monitoring of the Framework will rely on Key Performance Indicators, which are currently under development. We will ensure that environmental indicators and the issues identified in this assessment are factored into this process.</p>
<p>We broadly agree with the SEA. In particular we agree with the SEA when it says the 2nd Outcome under 'Our Responsibility for the Environment' should read 'We will protect and improve the natural capital and biodiversity of our historic environment' rather than, as it is currently, 'We will protect and maintain the natural capital and biodiversity of our historic environment'. The SEA provides useful detail in what lies behind the Framework and also provides good pointers for those tasked with implementing the Framework and some of the issues that need to be considered.</p>	<p>Noted. Wording of outcome amended in accordance with SEA findings.</p>

Respondee also said:

- Out of touch with the reality of exponential tipping points long past.
- It does not put the actions of individuals at the heart of the process nor does it encourage them to think and take responsibility.

When asked 'Do you think there are any additional mitigation, enhancement or monitoring measures that should be considered?', consultees commented with the following:

<p>Consultee comment</p>	<p>How has the comment been taken into account?</p>
<p>All seem correct.</p>	<p>Noted with thanks.</p>
<p>Leaving it to the experts.</p>	<p>Noted with thanks.</p>
<p>Looking at the impacts of over-tourism, which are detrimental to the lives of inhabitants and non-tourist businesses.</p>	<p>Noted. The application of the Framework will be on a case-by-case basis taking into account the individual site pressures.</p>
<p>Scottish govt. has commitment to human rights-based approach, but this is not well-reflected in the report.</p>	<p>Noted. We will consider this point in relation to future SEA work.</p>
<p>Content.</p>	<p>Noted with thanks.</p>
<p>Impact of promoting tourism on local communities can have an adverse effect - North Coast 500 is an</p>	<p>Noted. The application of the Framework will be on a case-by-case basis taking into account</p>

example where the over promotion of a resource can and does adversely impact the local communities.	the individual site pressures and impacts on communities.
[We] would like to see further reference to the need for historic buildings to switch to renewable sources of heating and decarbonise as far as possible. Old buildings are difficult to heat, and this must be improved. Historic buildings must be allowed to adapt to remain fit for purpose in the modern world - as they have always done in the past.	<p>The SEA assessment criteria for cultural heritage included the consequences of climate change for the historic environment, Consideration of this criterion included the likely effect of climate change adaptation and mitigation measures.</p> <p>More broadly, energy efficiency and low/ zero carbon heating in historic buildings is addressed more detail in other existing and emerging strategies and policies such as OPIT2 and HEPS, and in HES guidance, research, and advice.</p>
We would recommend collecting and analysing the full costs and benefits of supporting visitor access and activities, the demands on staff/volunteers, impacts on local communities and on the physical heritage assets. This can help inform future visitor management planning, as well as investment in heritage protection and visitor infrastructure.	Noted with thanks.

Respondee also said:

- The 'What if' scenarios may need to be explored further.
- Curb Tourism.
- Integrate sustainable international travel and assess marketing outside of Scotland.
- Put the action of individuals at the heart of it including the required behavioural changes.

5.4 How the Environmental Report has been taken into account

5.4.1 Key findings of the Environmental Report

The assessment was an iterative process with the process testing the wording of the outcomes and aspirations as they were drafted. Overall, our assessment found that the outcomes, and aspirations that underpin them, will generally have positive effects across the environmental topics that have been scoped into the assessment. We have identified one potentially negative effect at this level; however, mitigation measures have been identified to address this.

Following the identification of one enhancement measure and correlating feedback received for one of the Framework's outcome, the outcome has been rewritten in accordance, to increase the positive effects on biodiversity by ensuring that aspirations developed for this outcome can deliver a proactive approach in line with the national policy direction, giving consideration to the current biodiversity crisis. Further, we will ensure that alignment with HEPS will be embedded into the planning and delivery process during the implementation of the Framework.

The assessment methodology incorporates a cumulative assessment of aspirations, which has contributed to the findings for the overarching outcomes. We also considered whether delivery of the outcomes in combination would have cumulative effects and have concluded that this will not result in any significant additional effects.

5.4.2 Alternatives

It is a requirement of the 2005 Act that reasonable alternatives be considered during the SEA process. Alternatives were identified throughout the development of the draft Framework, as a result of extensive internal consultation in form of workshops and one-to-ones, and as part of the environmental assessment itself.

All alternative options were assessed to the same level of detail. The assessments considered whether effects would be positive or negative and short, medium, or long term. Once each option had been assessed, the findings were brought together to identify whether elements of the Framework are likely to generate cumulative effects on any of the environmental receptors scoped into the assessment.

Consultees offered a range of suggestions for changes to the draft Responsible Tourism Framework, some of which have led to minor text amendments. We have considered whether these changes are likely to have significant environmental effects and concluded that they will not cause the Framework to have any significant effects (including cumulative) additional to those identified in earlier stages of the assessment process. We will therefore not alter the findings set out in the Environmental Report.

5.4.3 Comments from the Consultation Authorities

The SEA Act requires Responsible Authorities to engage with the statutory Consultation Authorities for SEA. The detailed comments are noted below:

Consultation Authority	Comments on Environmental Report	How have we taken the comments into account?
NatureScot	<p>We agree that the environmental issues and key trends have been correctly identified and that the assessment of significant effects on the environment has been carried out satisfactorily. We welcome the incorporation of our suggestions from the scoping stage.</p> <p>We particularly welcome, in Outcome 02, Section 4, the change to ‘improve’ rather than ‘maintain’ the natural capital and biodiversity in the historic environment.</p> <p>We also welcome the intentions regarding partnership working, co-creation, the place principle, and increasing accessibility.</p> <p>We suggest a correction and update in Annex B, landscape p27, to reflect name change (NatureScot not SNH) and current landscape character assessment in Scotland. Suggested the text of the first two sentences is amended from <i>Scottish Natural Heritage have, in partnership with others, produced a series of 30 regional Landscape Character Assessment studies that identify and map the landscape character of all of Scotland. These are currently being reviewed with the aim of producing a single national dataset.</i> to <i>NatureScot has, in partnership with others, identified and mapped the landscape character of all of Scotland. Following an in-depth review, an online dataset was produced in 2019.</i></p>	<p>Noted with thanks.</p> <p>Amendments made in accordance.</p>
The Scottish Environment Protection Agency (SEPA)	No comment.	Noted. No action required.

5.4.4 Our response to other representations on the Environmental Report

We welcome the comments received on the Environmental Report, the majority of which agreed with the identified environmental impacts and mitigation, enhancement or monitoring measures.

5.4.5 Environmental mitigation & enhancement

As the environmental assessment notes, the openness of some of the Framework's aspirations made it challenging to offer specific mitigation at this level. However, the outputs of the assessment will help to focus our thinking on the environmental effects of the Framework's outcomes and aspirations in preparing future activities supporting its delivery.

Following the consultation period, one recommended enhancement measure was adopted, leading to a minor text amendment.

5.4.6 Monitoring

Section 19 of the 2005 Act requires the Responsible Authority to monitor significant environmental impacts of the implementation of the plan, programme or strategy. The purpose of the monitoring is to identify any unforeseen adverse effects at an early stage and to enable us to take appropriate remedial action.

We have identified one potentially negative effect during the assessment process; however, mitigation measures have been identified to address this. It will be important to understand how our Framework is affecting the environment once it is being implemented. This will help to identify any effects arising which were not predicted through the assessment and allow appropriate mitigation to be sought. Monitoring the HES Responsible Tourism Framework will rely on Key Performance Indicators which are currently under development for next financial year, and then reviewed on an annual basis.

5.4.7 Finalisation of the HES Responsible Tourism Framework

Overall, we consider the HES Responsible Tourism Framework fulfils its purpose by providing a clear starting point from which to direct our activities in an environmentally sustainable way, incorporating wider environmental issues as far as reasonably possible.

APPENDICES

APPENDIX 1: List of questions asked

The HES Responsible Tourism Framework covers three priority areas for effective action. To what extent do you agree with the identified priorities?

Each priority area hosts three outcomes. To what extent do you agree with the identified outcomes?

Please indicate to what extent the outcomes are relevant to you/ your organisation.

A series of aspirations is set out under each outcome. To what extent do you agree with the aspirations for each outcome?

Please make suggestions on how we can improve, including comments on what's missing from the Framework.

How ambitious is the Framework?

How clearly does the Framework express the role Historic Environment Scotland with respect to responsible tourism?

How clear is the language and wording in the Framework?

Has our environmental assessment identified the likely environmental effects of the options?

Do you think there are any additional mitigation, enhancement or monitoring measures that should be considered?

Do you have any other comments on the environmental assessment?

We are the lead public body established to investigate, care for and promote Scotland's historic environment.

We want to make sure Scotland's heritage is cherished, understood, shared and enjoyed with pride by everyone.

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