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Historic Environment Scotland Corporate Plan 2016-19

Strategic Environmental Assessment Post Adoption Statement

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1. Introduction

The Historic Environment Act Scotland 2014 established Historic Environment Scotland as the new Non-Departmental Public Body (NDPB) which takes over the functions of Historic Scotland and the Royal Commission on the Ancient and Historical Monuments of Scotland (RCAHMS).

On 1 October 2015 Historic Environment Scotland (HES) assumed the property, rights, liabilities and obligations of both organisations. It was intended the new body would build on the strengths and expertise of both organisations, with a remit to investigate, care for and promote Scotland's historic environment. Historic Environment Scotland is responsible for leading and enabling delivery of Our Place in Time (the Historic Environment Strategy for Scotland).

1.2 Background to the consultation

The above legislation provides a statutory obligation for Historic Environment Scotland to prepare a Corporate Plan that sets out a strategic direction for the organisation.

As one element of development of our Corporate Plan, we launched a consultation on 16 November 2015 which ran until 8 February 2016. This gave stakeholders an opportunity to provide their views on various elements of the draft Corporate Plan such as our draft mission statement, its vision, its values and outcomes and so on. We also ran a series of workshops and meetings across Scotland in order to encourage as many responses as possible to the consultation.

As well as the consultation document, respondents were also provided with a range of supporting documents including: a draft Equalities Impact Assessment (EQIA), a draft Business and Regulatory Impact Assessment and an Environmental Report outlining the findings of the Strategic Environmental Assessment (SEA).

A total of 49 consultation responses were received; 14 from individuals and 35 from organisations. We also conducted six face-to-face business consultations to complete the BRIA part of the plan (Business & Regulatory Impact Assessment).

To supplement the responses to the public consultation (as summarised above), we:

- provided an opportunity to discuss environmental issues with participants at the HES Corporate Plan stakeholder workshop, organised by Holyrood Events, on 26 November 2015; and
- worked with third party representatives through the [Built Environment Forum Scotland](#)¹ (BEFS). BEFS ran a consultation seminar on the draft HES Corporate Plan in January 2016. The outcomes from this event have informed the final Plan and will go onto inform its implementation.

¹ The Built Environment Forum Scotland Built Environment Forum Scotland (BEFS) is a membership organisation bringing together voluntary and professional non-governmental organisations that operate at the national level and represent people who work within the built environment sector (www.befs.org.uk) [accessed 10 March 2016]

2. Strategic Environmental Assessment Process

2.1 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 [SEA Environmental Report](#)² which documented the potential significant effects of the draft Corporate Plan was made available for consultation alongside the draft Plan. The SEA was taken forward by the Governance and Performance Team within HES which was responsible for preparing and consulting upon the Corporate Plan, as well as other associated impact assessments (Equality, Business and Regulatory Impact Assessments).

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 Corporate Plan.

2.2 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, 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, 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, programme or strategy.

² Environmental Report for Draft Corporate Plan (www.rcahms.gov.uk/rcahms_media/files/news/consultation-sea-draft.pdf) [accessed 10 March 2016]

3. How the Environmental Report and consultation has been taken into account

3.1 Key findings and recommendations of the Environmental Report

Overall our assessment found that the priorities identified within the plan are likely to have significant positive effects for the historic environment and population. We have not identified any potentially significant negative effects. However, we did identify a number of areas that will need careful management and balancing. We also expect that many of the issues identified in this strategic environmental assessment process will be addressed in more detail within the group business plans forming the next tier of our structure. In addition, a number of key specialist documents will detail particular areas of work. For example, a new Carbon Management Plan is currently being developed for HES.

Through the strategic environmental assessment, mitigation can be achieved in a number of different ways. It can involve making changes to the plan itself e.g. amending our priorities, adding environmental priorities to the plan to strengthen the inclusion of environmental issues or proposing more detailed measures that should be considered as the plan is implemented.

As noted above, we did not identify any significant negative effects during the course of the assessment that required specific mitigation measures to be identified. Nor did any effects emerge following the public consultations.

However, we did identify areas where our priorities could result in a conflict/tension between two environmental interests, in some areas it is possible to offset these through the contributions made by another (mitigating) priority. A series of recommendations and enhancement opportunities were identified and are summarised below.

- **Plan should say more about how we will balance any increase in visitor numbers with the pressures that may place on the environment and our ability to deliver against our climate change commitments.** For example, can we offer a commitment to examine sustainable ways of promoting our sites and work in partnership with transport providers to reduce emissions and increase efficiency?

Action taken: The Corporate Plan is mindful of this at a strategic level and the detail will be addresses in business planning.

- **Plan to better articulate how our lead and enable role will deliver real benefits for the environment.** Perhaps by the use of specific examples?

Action taken: These will be identified through our annual business plans.

- **Plan should set out a high level statement about how our grant giving criteria reflect not only our vision for the historic environment but other cross cutting national ambitions.** This should be supported by commitments made in relevant operational plans.

Action taken: We have commissioned a review of historic environment grants, which includes the development of outcomes and performance measures linked to our Corporate Plan. This will report later in 2016.

- **Amend the Plan's first sub-objective to say 'seeking every opportunity to reduce the adverse environmental impact of our activities'.** Then say how this will be done. Much of our climate change work is about leading and enabling and the Corporate Plan objective talks about the impact/effects of climate change. However, the actions in the plan seem to relate mostly to the causes of climate change/reducing our own carbon emissions.

Action taken: The Corporate Plan clearly sets the strategic context for our lead, do and enable climate change activities, and we will report progress via an overarching KPI.

- **Plan to set the strategic context to ensure relevant operational plans set out opportunities, identified through this SEA.**

Action taken: The Corporate Plan sets the strategic context for these activities and our business plans will seek every opportunity to address them as they are implemented.

4. Opinions expressed during the consultation

4.1 The consultation process

We consulted on the draft Corporate Plan between 16 November 2015 and 8 February 2016. A total of 49 consultation responses were received; 14 from individuals and 35 from organisations.

Table 1.1: Profile of consultation responses

Respondent group	Number
Total organisations	35
Local authority	8
Public Body	7
Professional body	6
Voluntary sector / charity	10
Other	4
Individuals	14
Total	49

Two stakeholder events, each involving a number of group discussions, were held and the outcome of these events have informed the drafting of the plan. A detailed report of all consultation responses can be found in Historic Environment Scotland's main analysis report³.

4.2 Comments on the Environmental Report

The consultation asked one question in relation to the Environmental Report:

'do you agree with the results of the environmental assessment and have the key issues associated with the environmental implications of the draft plan been identified?'

Of the 49 responses to the consultation, 17 respondents, across all sub-groups, opted to provide an answer to this question. Of those providing a response, many more agreed with the results of the environmental assessment (11) than disagreed (only one). Five respondents did not opt to either agree or disagree but provided commentary only.

Of the 49 responses, 15 provided comments in relation to the Environmental Report.

Of those answering 'yes', some provided additional commentary and this included:

- Agreement with recommendations 1-5 (Individual)
- Agreement with many of the approaches (non-specified) (local authority)
- Plan considers environmental implications (Individual)
- Agreement with statement '... we have identified a number of areas that will need careful management and balancing' (Voluntary sector organisation)

³ <https://www.historicenvironment.scot/about-us/who-we-are/corporate-information/>

- Need the importance of working with other organisations to address the impact of climate change to be developed more strongly in the Corporate Plan (Voluntary sector organisation).

Of those respondents neither agreeing nor disagreeing with this question, comments included:

- A need to include biodiversity as this can impact on long term landscape changes (Individual)
- Welcome for the statement in S5 about climate change (Voluntary sector organisation)
- Potential effects on the water environment have been scoped out of detailed assessment (Public Body)
- An example of how another organisation deals with organisational development activities (Voluntary sector organisation)

It was felt by one respondent that the issue of climate change and the need for energy infrastructure to be able adapt to a changing climate could have been explored further. It was also felt that the opportunities offered by biofuel to deliver biodiversity benefits in managed forestry of low natural heritage value may have benefited from further discussion. The need for careful planning and management in relation to the availability of potential heat sources to ensure maximum efficiency was also noted.

Consultation Authorities

The SEA Act requires Responsible Authorities to engage with the statutory Consultation Authorities for SEA⁴. Both SNH and SEPA responded to the Environmental Report and were supportive of the conclusions we had reached. Their detailed comments are noted below:

<i>Scottish Natural Heritage</i>	Thank you for consulting SNH on the Historic Scotland Corporate Plan 2016-19 and its Environmental Report. I have reviewed these documents on behalf of SNH in relation to our natural heritage remit. I have no detailed comments to make on either the Corporate Plan or the findings of the Environmental Report as our advice at scoping ' <i>that landscape be included as it forms an important element of the historic environment</i> ', is now covered in the Corporate Plan and considered in the Environmental Report.
<i>The Scottish Environment Protection Agency (SEPA)</i>	<p>Thank you for your Environmental Report (ER) consultation submitted under the above Act in respect of the Historic Environment Scotland Corporate Plan 2016-19. This was received by SEPA via the Scottish Government SEA Gateway on 17 November 2015.</p> <p>Please note that the comments set out below relate only to the ER and that our comments on the plan itself will be provided separately.</p> <p>We are pleased to note that the comments we made at the scoping stage have been addressed in the assessment and as such we are content with the adequacy and accuracy of the ER. We would bring to your attention the observations noted below in respect of cumulative and interrelated effects.</p>

⁴ The [Consultation Authorities](http://www.legislation.gov.uk/asp/2005/15/section/3) are The Scottish Environment Protection Agency (SEPA), Scottish Natural Heritage (SNH) and Historic Environment Scotland (HES). Given HES are the Responsible Authority for this plan and its SEA, as is normal practice, we did not fulfil our Consultation Authority on this occasion (www.legislation.gov.uk/asp/2005/15/section/3) [accessed 10 March 2016]

	<p>With reference to the potential interaction of climate change with the achievement of the strategic priority <i>Protect and Care</i> we would highlight the importance of consideration of flooding and the water environment in this respect. This is particularly pertinent in relation to proposals for works and grant funding / investment decisions. We would therefore encourage you to consider inclusion of an additional enhancement opportunity under Recommendation 5 (climate change) in this respect e.g.:</p> <ul style="list-style-type: none"> • <i>To work with relevant bodies (including regulators and providers of grants for natural environment works) to enable works proposed to, or in the vicinity of historic environment features to be mutually beneficial.</i> <p>Such an additional recommendation would help to set a strategic context for this collaboration which may become more significant in the future. For example, the recent flood events have drawn attention to the effects of flooding and the role of flood protection and prevention measures – consideration of their impact on the historic environment and its setting may become increasingly important. Examples of such works include:</p> <ul style="list-style-type: none"> • measures required to protect people and property from flood events which may have an effect on the historic environment and / or its landscape setting; • removal of historic structures within or adjacent to watercourses e.g. weirs and bridges; • proposals for environmental works such as re-aligning watercourses to a more natural state which could have positive effects on the landscape setting of the historic environment. <p>Whilst the Responsible Authority may not consider these to be significant issues in terms of the current SEA we would encourage you to use this opportunity to ensure that the strategic context reflects these issues and enables a direct link to be made with other plans in the hierarchy (such as Operational Plans) which may address them in more detail.</p>
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Our response to representations on the Environmental Report

We welcome the comments received on the Environmental Report, the majority of which agreed with the recommendations we had identified and are taking forward.

A recurring theme related to the embedding of climate change mitigation and adaptation throughout the plan and the activities we undertake in support of our objectives. This was emphasised by SEPA who have suggested we consider exploring ways in which we can collaborate with others in enabling climate change adaptation measures that support the care and protection of the historic environment – as well as deliver mutually beneficial outcomes for other environmental interests.

We agree that there are opportunities to develop this area of work further and will take this, and the other points raised in response to the Environmental Report into account through our Business Planning and other Corporate Plan delivery workstreams.

5. Finalisation of the Corporate Plan

5.1 Introduction

It is a requirement of the 2005 Act that reasonable alternatives be considered during the SEA process. This process was undertaken in discussion with the Consultation Authorities at scoping stage and the extent to which alternatives could be considered 'reasonable' was also influenced by:

- the legislative framework for the document;
- the large proportion of committed objectives and actions embodied in the document; and
- the [Schemes of Delegation](#)⁵ with Scottish Ministers

5.2 Alternatives

The Environmental Assessment (Scotland) Act 2005 requires that information is provided to explain the reasons for choosing the finalised Plan in light of other reasonable alternatives. As noted in the Environmental Report, we did not assess strategic alternatives i.e. the 'no plan' option as it is a requirement of the Historic Environment (Scotland) Act 2015. We also did not assess those aspects of the plan that are largely prescribed by the Schemes of Delegation with Scottish Ministers.

The Corporate Plan has been prepared in consultation with our partners 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 Plan through making amendments to the draft actions and incorporating particular environmental issues. In particular, it helped to raise awareness of how there can be, in some areas, tensions between what we do in relation to other environmental objectives.

The majority of the objectives included in the Corporate Plan are considered to have positive or neutral environmental effects. A few of the objectives could have negative environmental effects, however, these are not expected to be significant. In some areas the scale and nature of any environmental effects remains uncertain at this stage and will depend upon the implementation of the strategic priorities. We intend to monitor these areas through our internal Directorate Business Plans which will also build upon the work taken forward within the Scottish Historic Environment Audit.

Overall, we consider that the Corporate Plan fulfils its purpose by providing a clear framework to direct our activities in an environmentally sustainable way, incorporating wider environmental issues as far as reasonably possible.

5.3 Environmental mitigation & enhancement

⁵ Our Schemes of Delegation set out the direction for the management of properties and collections in our care. The schemes contain the functions which Scottish Ministers have delegated to Historic Environment Scotland, and contain the conditions and limits that apply to the delegation. (<https://www.historicenvironment.scot/about-us/who-we-are/corporate-information/schemes-of-delegation/>)

As noted above various recommendations have been identified and will be taken forward through the detailed business planning process over the coming 3 years. Further strategic and/or project level environmental assessment may be required for some of the Corporate Plan's objectives as they are implemented.

5.4 Next steps

The Strategic Priorities and Key Commitments of the Corporate Plan will be monitored and reported throughout the Plan period. The Corporate Plan is next due for review in 3 years. The Corporate Plan will underpin detailed annual business plans that will show how our long-term Vision and Key Commitments will be implemented and how all our other day to day activity, statutory and otherwise, will be carried out.

Progress on specific key performance indicators (KPIs) will be further monitored by the Historic Environment Scotland Senior Management Team, who will also consider how best to source critical external challenge. We will publish our KPIs in April/May of each year and our annual reports in the autumn.

5.5 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 them to take appropriate remedial action.

We did not identify any negative effects that require specific mitigation and monitoring, although we will monitor the delivery of the commitments outlined above. We will also monitor the performance of the Plan as a whole by assessing progress against each strategic action. This framework will be used to produce an annual monitoring report.

Annual business plans will be published for each year of the Corporate Plan and they will set out key deliverables, resources and how successful delivery will be measured. Progress on specific Key Performance Indicators (KPIs) will be further monitored by the HES Board and the Senior Management Team. KPIs will be published in April/May of each year and our annual reports in the autumn.

Distribution & advertising

This consultation was circulated to a list of Historic Environment Scotland stakeholders and equalities groups (see Annex A) via email at the beginning of the consultation period. The consultation was hosted on the Historic Environment Scotland websites with a prominent newsflash on the homepage. The consultation was also advertised in the Herald newspaper (on 16 November 2015), for the purposes of Strategic Environmental Assessment⁶. Articles advertising the consultation were also published in 22 different national and regional newspapers as well as other publications, 9 online and the rest in hard copy.

Encouraging participation

Several steps were taken to overcome any barriers to participation. Advice from the Scottish Government's Equality Unit was sought on ways in which equality groups could be consulted. National organisations concerned with improving access and representing the voluntary sector were directly notified about the consultation exercise. Questions 8 and 9 of the consultative draft sought comments on any issues in the Corporate Plan which might affect an equality group.

The relevant consultation documents were divided into separate pdf files (e.g. draft Corporate Plan, Environmental Report and Equality Impact Assessment Report) and a Word document (Response form) to minimise download time.

The consultation on the draft Corporate Plan was also promoted on social media (Twitter and Facebook) using images and videos to make the consultation more accessible.

Consultation format

The consultation document asked 12 questions, 4 of which invited measure of agreement responses (on a range from 'Strongly agree' to 'Strongly disagree') as well as respondents' views and 8 asked for respondents' views. Nine questions related to the Corporate Plan itself; one question related to the impact of the Corporate Plan on stakeholders' business interests; one question related to equality and accessibility issues and one to the Environmental Report which set out the findings of our strategic environmental assessment.

Participants were encouraged to use a Response Form as it structured responses by providing a space beneath each of the 12 questions and could be filled out electronically or by hand. The Response Form was used by 44 of the 49 respondents.

The Historic Environment Scotland Corporate Plan 2016-19 consultation elicited responses on:

- Our vision for the historic environment
- The ways Historic Environment Scotland can contribute to Scotland's National Outcomes
- The major challenges for the historic environment that the Corporate Plan can help to address

⁶ Section 16 of the Environmental Assessment (Scotland) Act 2005 places a requirement to publish a notice in at least one newspaper circulating in the area to which the plan or programme relates to ensure that the contents of the notice are likely to come to the attention of the public.

- Key areas relating to Historic Environment Scotland's impact on stakeholder's business interests that should be considered in the Plan
- The commitments identified other strategic priorities, outcomes or key commitments that should be considered
- Important areas not currently covered in the draft Plan
- Equality or accessibility issues that should be reflected in the Plan
- The results of the environmental assessment carried out on the Plan
- Whether the key issues associated with the environmental implications of the Plan were identified, which could be found in the Environmental Report and Summary accompanying the consultation draft of the Plan
- Whether organisations were willing to sign up to the delivery of the priorities for action and, if so, what the organisation intends to contribute; and
- Additional comments

Approach to the analysis

This analysis has been conducted in a series of analytical steps. Independent consultants were employed to analyse and report upon all responses received, including key themes emerging from groups and individuals. This included statistical analysis which compared participants to the distribution list in order to determine the response rate related to interest groups. Key issues were identified and then summarised as general conclusions.

Full details of the consultation analysis is contained in a separate report, published on Historic Environment Scotland's website.

The findings are specific to this consultation exercise and do not necessarily reflect the weight or range of views within the population or sub-populations as a whole and the respondents have not been representatively or purposively sampled.

Annex 2 – List of consultation questions

Q1. Do you agree with our mission statement (p. 6) for HES?

Q2. Do you agree with our vision (p. 9) for HES?

Q3. Do you agree with values (p. 9) for HES?

Q4. To what extent do you agree that the outcomes (p. 10, p. 12- 18) are the right outcomes for HES?

Q5. Do you have any suggestions for amendments to the outcomes? Is there anything missing?

Q6. Do you have any comments on the objectives (p. 10, p. 12- 18) we have assigned to the outcomes? Is there anything missing?

Q7. Do you have any comments on the measures of success (Annex, p. 24-26) that we have assigned to the outcomes?

Q8. Do you think any of the objectives in the Corporate Plan will impact differently on people who share protected characteristics? (for example, in relation to their age, disability, gender, pregnancy/maternity, marital status, gender identity, sexual orientation, race, religion or belief). (please see the draft Equalities Impact Assessment)

Q9. Are there any key issues or opportunities we should consider to make sure that the Corporate Plan works for different equality groups? (please see the draft Equalities Impact Assessment)

Q10. Do you agree with the results of the environmental assessment (please see the draft Environmental Report) and have the key issues associated with the environmental implications of the draft plan been identified?

Q11. Are there any key areas relating to HES's impact on our stakeholder's interests that should be considered in our Plan?

Q12. Please use this section to provide any other comments you think are relevant to the Corporate Plan.