



HISTORIC  
ENVIRONMENT  
SCOTLAND

ÀRAINNEACHD  
EACHDRAIDHEIL  
ALBA

## DESIGNATIONS STRATEGY - ISLAND COMMUNITIES IMPACT ASSESSMENT

*Historic Environment Scotland is a named relevant authority within the [Islands \(Scotland\) Act 2018](#). When we are **planning or reviewing a policy, strategy or service** we need to consider whether it is likely to have an effect on an island community, which is significantly different from its effect on other communities (including other island communities) (Section 8 of the Act). If it does, we need to complete and publish an Island Community Impact Assessment.*

### INITIAL SCREENING

#### Step One: Developing a clear understanding of your objectives:

- *Is the policy, strategy or service either **new** or **under** review?*
- *What are the objectives of the policy, strategy or service?*
- *How are islands identified for the purpose of the policy, strategy or service?*
- *What are the intended impacts/outcomes and how do these potentially differ in the islands?*

#### Background

Historic Environment Scotland (HES) is a charitable Non-Departmental Public Body (NDPB) whose statutory functions for national-level heritage designation are set out in three primary acts<sup>1</sup> transferred to HES in the Historic Environment Scotland Act 2014.

Heritage designation and the associated consenting and advisory systems it triggers are the principal legal mechanisms for the protection of around 55,000 of Scotland's most important historic sites and places. How a site or place is designated is relevant to a wide range of organisations and people, from owners to developers, local authorities and communities.

Delivery of national-level heritage designation is resource-intensive for HES and more widely. In 2024, these factors alongside wider societal and environmental change, led the Heritage Directorate to undertake a strategic review to consider whether the current system and approach is the right one.

---

<sup>1</sup> the Ancient Monuments and Archaeological Areas Act 1979; the Planning Listed Buildings and Conservation Areas (Scotland) Act 1997; the Marine (Scotland) Act 2010. With the 2010 Act, our designation role is as advisor to Scottish Government, rather than as a designating authority.

Our strategy is intended to address the findings of our review and to align with and contribute to the priorities set out in the following wider sectoral/HES strategies and plans:

- [Our Past Our Future: The strategy for Scotland's Historic Environment](#);
- [Heritage for All, the HES Corporate Plan 2025-28](#); and
- [HES Mainstreaming and Equality Outcomes Report 2025-29](#).

The strategy outlines a proposed approach to delivery of national-level heritage designation in Scotland.

### [Vision, mission, priorities](#)

The strategy includes the following long-term vision:

**‘By 2035, our protected historic places will more fully reflect Scotland's rich and diverse heritage. Protecting these places and providing accurate and accessible information about them will enable good decision-making, delivering better heritage outcomes and wider community benefits.**

Within the broader mission of HES, our purpose in carrying out this work is:

**‘to identify, protect, and provide information about Scotland's most significant historic places. Our work supports planning authorities, owners and others to make good decisions, ensuring our historic environment is well managed for current and future generations.’**

It also sets out priorities for the next three years 2025-28, including initiatives, intended outcomes and performance indicators:

**Objective 1: Improving our information** - by March 2028, enhance the clarity and accuracy, accessibility and usability of our data and records so that Scotland's protected historic places are better understood and valued.

**Objective 2: Improving our service** - redesign our public offering to deliver timely decisions, publishing details of a revised approach by March 2026.

**Objective 3: Understanding impact** - by March 2028, capture and communicate baseline evidence and insights into the impacts of the current heritage protection systems.

**Objective 4: Looking ahead** – by March 2028, HES will be leading an inclusive conversation on Scotland's heritage protection system to shape long-term (10-year) approaches and shorter-term priorities.

### [Impact on Islands](#)

The designations strategy relates to the national-level designation function of HES. As it is nationwide in scope, the strategy does not specifically identify nor differentiate for the Islands, with the intended objectives and success measures the same for the islands as on the mainland.

However, as required by the Islands Scotland (2018) Act we have taken this opportunity to consider whether the impact, intentional or otherwise, of the strategy could potentially differ

in the islands, as we would not wish to make decisions that would unilaterally disadvantage any island communities.

## STEP TWO: GATHER YOUR DATA AND IDENTIFY YOUR STAKEHOLDERS

- *What data is available about the current situation in the islands?*
- *How does any existing data differ between the islands?*
- *Are there any existing design features or mitigations in place?*

### Data

We have several datasets available which can tell us about the current situation on the islands, which were consulted and considered during the development of the Designations strategy. Some of the data can be disaggregated to island authority level, though some national surveys typically struggle to produce reliable information for Island communities due to their sample sizes and collection methods, as such, data was supplemented with anecdotal and operational information.

#### Historic environment asset base

- Map-based search and information about designated heritage assets in the islands is available by visiting [Historic Environment Scotland's Heritage Portal](#).
- The islands boast unique heritage assets, including World Heritage sites like the Heart of Neolithic Orkney and St Kilda.  
A baseline study for the 2023-24 designations review found the Western Isles have 218 scheduled monuments, representing 1.9% of archaeological records in the National Record for the Historic Environment (NRHE). The analysis showed the Western Isles may be under-represented in the Schedule alongside non-island local authority areas like East Renfrewshire, East Ayrshire and Glasgow. The percentage for the Western Isles is certainly lower than Orkney (7.5%) and Shetland (4.98%), as well as some non-island areas like East Lothian. Geographical gaps in the List of buildings of special architectural or historic interest are harder to define due to differences in building recording, though the Western Isles with 253 listings may also be under-represented alongside non-island local authority areas like Inverclyde and East Renfrewshire. Further analysis would be required to understand if these are real gaps.
- HES's Climate Action Plan identified the islands' scheduled monuments (and other traditional buildings) as being at significant risk due to the high concentration of coastal sites affected by erosion and sea level rises, and the comparatively high exposure to weather conditions (wind, rain) than some mainland sites

#### Delivery of designations service

- The current delivery of designations is nationwide and involves responding to external requests and projects. We do not differentiate between external requests

depending on where they have come from. To ensure value for money and efficiency, we may group sites together to be more cost effective. This may have implications for timescales but applies equally to mainland as it does to island locations.

- HES maintains internal designation case data by local authority area but not by island region. In the decade since October 2015 when HES was created, out of a total of 9,414 designation cases, we processed 367 designation cases<sup>2</sup> in the Western Isles, 78 cases in Shetland, and 186 cases in Orkney which gives an idea of case handling in the associated island regions. Some cases in Argyll and Bute, Highland, and North Ayrshire Councils, may be located respectively in the Argyll Islands, the Highland Islands, or on Arran, Bute and the Cumbraes. However, for these councils, we cannot currently disaggregate the information to island region level from those on the mainland.
- The larger number of cases in the Western Isles during this period relates primarily to decisions related to a project to improve the spatial information for scheduled monuments and a listing thematic project to review the listings of thatched buildings in Scotland (2017 to present).

#### Other factors

- *Engagement* – Engagement with the historic environment is marginally higher in island Local Authorities (LAs) than the Scottish average, with the Scottish Household Survey in 2019 reporting 39% of residents in island LAs visiting a historic site in the previous 12 months compared to 35% for Scotland as a whole.
- Primary research conducted by HES in 2019 to establish the links between heritage engagement and individuals' wellbeing did not find any statistically reliable differences in the rate or types of benefits reported between island and non-island areas, with 76% of respondents reporting that their overall life satisfaction was improved through engagement with the historic environment.
- Through local engagement, consultation and research we know that heritage is an integral part of island communities – both the built heritage and the intangible cultural heritage (ICH) shaping their sense of place, pride, and traditions.
- *Language impact* – according to the 2022 Scottish Census,<sup>3</sup> 97.5% of people have no skills in Gaelic, but in the Western Isles, the majority (57.2%) had some Gaelic skills, with Highland (8.1%) and Argyll and Bute (6.2%) the next highest. This may be relevant when considering the accessibility of our services and designations information.
- *Projects and support* - HES has regular liaison with relevant teams in local authorities, community planning partnerships, and development agencies covering the Islands to check alignment of policies and plans, ensure a partnership approach to projects, as well as thematic or policy issues that need to be addressed.

---

<sup>2</sup> The number of cases includes where we have made statutory changes or minor record or spatial data updates. It also includes some cases where we have looked at a record or site but taken no action.

<sup>3</sup> <https://www.scotlandscensus.gov.uk/2022-results/scotland-s-census-2022-ethnic-group-national-identity-language-and-religion/#section7>

We used a public consultation to ascertain what, if any impact, the strategy has on owners and occupiers of designated sites on islands, on local authorities, and their communities. We then considered if any mitigations were required when we finalised the strategy.

## STEP THREE: CONSULTATION

- *Who do you need to consult?*
- *How will you carry out your consultation?*
- *What questions will you ask when considering how to address island realities?*
- *What information has already been gathered through consultations and what concerns have been raised?*

### Evidence gathering

The development of the draft strategy followed an extensive evidence-gathering phase involving both internal and external stakeholder engagement to gather views about delivery of national-level designation by HES. For the external engagement, we partnered with MainStreet Consultants. They interviewed more than 100 external heritage and planning stakeholders, selected based on their knowledge of the existing system. As part of this, our consultants held a meeting with Heads of Planning Scotland, including representatives from Western Isles Council, Orkney Islands Council as well as Argyll and Bute Council and Highland Council which also has major island communities within its responsibilities.

### Consultation

We held a public consultation on the strategy for six weeks from 20 May 2025 – 1 July 2025. An online survey was hosted on Historic Environment Scotland's consultation website [Citizen Space](#) during this time:

We asked the following question to gather evidence about the potential impact of the strategy on island communities:

*'What impact do you think our plan might have on people in island communities?':*

We promoted the consultation through direct email contacts to heritage, planning, and community stakeholders, including those in island communities. We also promoted the consultation on social media through LinkedIn. Respondents were asked to submit their response by completing an online survey, or by emailing to [designationconsultations@hes.scot](mailto:designationconsultations@hes.scot).

We received 39 responses to the consultation including representation from island local authorities in Orkney and Shetland.

During the consultation window, we organised two stakeholder engagement events (one online to encourage participation from island communities, and one in person) in partnership with the Built Environment Forum of Scotland. BEFS promoted the events to their membership.

These events were attended by 32 participants (not including BEFS and HES). The online event was attended by a representative from Comhairle nan Eilean Siar.

## STEP FOUR: ASSESSMENT

*You must now determine whether in your opinion the policy, strategy or service is likely to have an effect on an island community which is significantly different from its effect on other communities (including other island communities).*

*To form your opinion, the following questions should be considered and any further explanation or evidence provided below:*

### Summary of feedback and findings

Within our consultation, 32 (out of 39) respondents answered our question about the potential impact of our strategy on people in island communities. 10 responses (26%) answered 'positive'; 1 (2.6%) answered 'negative', and 4 (10%) answered 'no impact'. 17 respondents (44%) answered 'not sure'.

Of the 32 respondents to the above question, 17 provided additional comments. Most responses were neutral in tone or cautiously positive on the potential impact of the strategy on island communities noting potential benefits. However, several responses raised practical concerns or expressed uncertainty summarised below.

Based on this evidence, we have considered the following:

- Does your assessment identify any unique impacts on island communities? **No**
- Does your assessment identify any potential barriers or wider impacts? **No**
- Does the evidence show different circumstances or different expectations or needs, or different experiences or outcomes (such as different levels of satisfaction, or different rates of participation)? **No**
- Are these different effects likely? **No**
- Are these effects significantly different? **No**
- Could the effect amount to a disadvantage for an island community compared to the mainland or between island groups? **No**

In summary, based on the feedback received through our consultation, **we consider that a full Islands Communities Impact Assessment is not required.**

### Rationale

The delivery of HES's designations service is Scotland-wide, and responses to our consultation suggest that any impacts on island communities are likely to be neutral or cautiously positive. Heritage is often deeply embedded in local identity in island areas, and the strategy may enhance community pride and contribute to tourism.

Some respondents noted logistical challenges and higher costs associated with designation in island contexts. However, these costs are borne by HES as part of its commitment to a national designations service, and do not fall to island communities.

Other respondents noted potential for higher costs resulting from designated status – such as sourcing appropriate materials or contractor access. We recognise these perceptions which are not unique to islands and may equally apply to rural mainland communities. These concerns of increased costs relate to the implications of designated status rather than the designation process itself and need to be considered separately.

Additionally, some respondents expressed a perceived risk that prioritising under-represented sites in areas of high development pressure could disadvantage island sites. We consider that this could equally apply to rural mainland sites. HES remains committed to delivering an equitable national designations service and recognises the need to reflect the unique and varied contexts of island communities in our work.

We will take steps to ensure that our prioritisation framework does not adversely impact island areas and will continue to monitor and adapt our approach to uphold fairness and inclusivity across all parts of Scotland.

<b>Approved by</b>	<b>Job Title</b>	<b>Date</b>
Dara Parsons	Head of Designations	31/10/2025