



Island Communities Impact Assessment – Initial Screening

Updated April 2023 following on from the conclusion of consultation and engagement events

HES is a named relevant authority within the [Islands \(Scotland\) Act 2018](#) alongside a series of other public and Local Authorities with a direct or indirect role in delivery of the Historic Environment.

The review and refresh process for the historic environment strategy: *Our Place In Time* (OPiT) carried out an initial screening before public consultation, and determined that no Full Island Communities Impact Assessment will be needed.

The screening was published with the consultation draft of the strategy, with public consultation running from 28 November 2022 to 20 February 2023. This document now includes updates to the original initial screening and incorporates feedback and engagement activities from during the consultation period.

Following public consultation, it is still determined that no Full Island Communities Impact Assessment will be needed.

The risks to Island Communities are judged to be low based on the following key points:

- The new strategy was developed through an extensive consultation process which included engagement before and during the 12-week public consultation. The engagement took an inclusive design approach, with engagement events specifically delivered for Island Communities to ensure solid representation in the development process. No significant evidence was presented during engagement or consultation which suggested that Islands Communities would be materially disadvantaged by the strategy.
- The Minister's commissioning letter for HES to refresh OPiT highlighted the need to incorporate the Government's increased focus on tackling inequality and on community empowerment, alongside the digital evolution and prioritising work to combat the effects of climate change. These have all been factored into the new strategy, now called *Our Past, Our Future* (OPOF).
- The mid-term evaluation of the existing strategy, OPiT, in 2019 did not identify any specific concerns relating to Island communities but did highlight the need for additional emphasis around community empowerment. This has now been incorporated into the new strategy.
- Islands will have different local needs and circumstances, in the same way that different communities across Scotland will have different circumstances. The new strategy, OPOF, plans to take the same approach to challenges

regardless of location. HES has therefore not identified any new, significant issues through the formal ICIA initial screening process, concluding “no” for each of the Scottish Government’s key questions which define the need for a Full ICIA, rather than Partial:

Does your assessment identify any unique impacts on island communities?	No
Does your assessment identify any potential barriers or wider impacts?	No
Regarding the Historic Environment’s strategic approach, does the evidence show different circumstances or different expectations or needs, or different experiences or outcomes? Are these different effects likely? 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 addition to this, Bòrd na Gàidhlig (BNG) sent in an extensive consultation response, which identified that the use of Gaelic by islanders was not included in the ICIA despite available data – this has been rectified using the 2011 Census results (2022 results had not been published at time of publication). They also requested information on how many island organisations took part in the consultation process, as assurance that Gaelic in island communities had been considered, and that the concerns of Gaelic-speaking islands stakeholders be factored into the consultation process.

Overall, there has found to be nothing in the consultation or workshop responses that show Gaelic Language in Island Communities will be materially disadvantaged by the new strategy. Gaelic was not raised as a specific area of concern by representatives from the island communities either in workshops or in the consultation responses. However, we note, and have incorporated, BNG’s request for transparency regarding engagement and have added the requested data and further detail of our approach to the screening, under Section Three: Consultations.

Of relevance, a Gaelic version of the strategy is planned for the strategy’s official launch in Summer 2023; whilst Historic Environment Scotland’s updated Gaelic Language Plan is currently (April 2023) being consulted on, and this will reflect OPOF.

The screening evidence considered in reaching this conclusion is summarised below, following the Scottish Government’s required approach.

Initial Screening
Step One: Developing a clear understanding of your objectives
<ul style="list-style-type: none"> • 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 – The Existing Strategy

Our Place in Time (OPiT) was Scotland's first strategy for the historic environment, published in 2014. It sets out a vision for how the historic environment can be understood, valued, cared for and enjoyed. Its strategic priorities are:

- Ensuring the cultural, social, environmental and economic value of our heritage continues to contribute to Scotland's wellbeing.
- Investigating and recording our historic environment to continually develop our knowledge, understanding and interpretation of the past, and how best to conserve, sustain and protect it.
- Caring for and protecting the historic environment in order to both enjoy and benefit from it, and to conserve and enhance it for future generations.
- Sharing and celebrating the richness and significance of our historic environment.

OPiT set a common set of objectives for all stakeholders involved in managing the historic environment and delivering associated activities, spanning public bodies, charities, trusts and private enterprises, giving transparency to users and the public.

Recognising that the strategic context has changed since OPiT was published, in February 2022, Scottish Ministers commissioned Historic Environment Scotland (HES) to review OPiT and ensure it is fit for a post-COVID world.

The new sector strategy, *Our Past Our Future* (OPOF), will set out a shared five-year vision to 2028, with outcomes and objectives to optimise the historic environment's contribution to Scotland's National Performance Framework. It will complement other Scottish Government strategies including those for Culture and Scotland's museums, the Historic Environment Policy Scotland (HEPS), the National Planning Framework 4, Biodiversity, Climate Change, and the National Strategy for Economic Transformation. The key themes considered in its development were:

- Addressing Climate Change
 - Decarbonising homes and industries
 - Adaptation and climate resilience
- Securing a stronger, fairer, greener economy
 - Green recovery opportunities
 - Fair work
- Supporting progress towards meeting child poverty targets
 - Increasing household incomes
 - Reducing direct costs
- Tackling inequality and promoting human rights
- Community empowerment
- Digital delivery
- Post-COVID economic recovery and renewal

- Creating a more sustainable and resilient sector

OPIt was nationwide in scope and does not specifically identify Islands. The intended outcomes when OPIt was developed were considered to be the same in the islands as on the mainland. The Islands Communities Impact Assessment was not in place when OPIt was being developed. This refresh provided an opportunity to consider whether the intended objectives and outcomes for OPOF could potentially differ in the islands, as the sector would not wish to make decisions that would unilaterally disadvantage the islands.

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?

Delivery in the sector is diverse, as are the extent of relationships with specific Island Communities. The design of the strategy drew on the available public data sets which are used to monitor the overall performance of the sector (in annual reviews), and which can be disaggregated to Island level. These were used to inform the economic, social, and environmental impacts of Heritage and where there are local concentrations of key beneficiary groups or pressures for a tailored local approach, including:

- National demographic and social surveys (e.g. Scottish Household Survey and SIMD) to track the catchment and beneficiaries for heritage assets, and to better understand local engagement;
- National labour market and visitor surveys (the IPS, GBTS, GBDVS) to model the tourism and construction impacts of existing historic environment operations, and to understand local communities' reliance on the employment generated through these channels.
- Asset registers to map the concentration of local traditionally built residential stock and employment space, scheduled and listed buildings, plus Buildings At Risk, to better understand the need for and scale of investment and skills.

These National surveys often struggle to produce reliable information for Island Communities due to their sample sizes and collection methods, so data was supplemented with anecdotal and operational information gathered during the consultation process, including:

- Site management information from organisations operating attractions / sites across the Island Local Authorities, including HES, NTS and HHA;
- Grants investment, including directly to organisations and individuals in island communities, including HES, NLHF and AHF.

- Engagement through the community planning partnerships, economic development teams and planning authorities in Shetland, Orkney, Comhairle nan Eilean Siar, the Highlands and Argyll & Bute.
- Records of advice and support to individuals and organisations in relation to protecting, conserving, understanding, and celebrating their heritage in their island communities.
- Insights from NDPBs, thematic groups and intermediaries who have island communities amongst their members – such as Visit Scotland, Creative Scotland, ASVA, STA, SURF, BEFS, DTAS, A&BS, SFHA, IofA, MGS
- Previous consultations within the sector including for the Historic Environment Policy for Scotland: Two Years On, COVID19 sector surveys in 2020 and 2021, HES's Corporate Plan and specific projects like the Orkney Gateway.
- Feedback from members of existing heritage organisations and visitors, including regular surveys.
- People employed on or resident in the islands and working in the sector.

The existing evidence for Island Communities is set out below.

Engagement & Wellbeing

- **Stronger 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.
- **Equal wellbeing:** 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.
- **Heritage shapes local places:** through local engagement and existing research we know that the historic environment 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.
- **Relative importance of Intangible Cultural Heritage:** the historic environment provides creative inspiration for a variety of activities and events on the islands and they may be more reliant on ICH than other Scottish communities.

Historic Environment Asset Base

The built historic environment has a diverse range of ownership and management structures, stakeholders and levels of recognition and planning protection. Local areas will have taken different approaches to proposing buildings and sites for the varying levels of heritage recognition, and so will have varying ownership and management structures to plan around.

- **World Heritage status:** the islands have unique and significant heritage assets, including some with World Heritage status (Heart of Neolithic Orkney, St Kilda).
- **Scheduled monuments:** there are 336 scheduled monuments in the care of Scottish ministers. These are managed by Historic Environment Scotland on behalf of ministers. 54 of these 336 Properties in Care (PICs) are on islands, including 9 which are staffed visitor attractions. They are managed through a central Asset Management process and strategy, assessed against the same principles as mainland sites. Practical works are delivered through a regional structure of maintenance depots and skills, and following HES's procurement strategy for contractors and materials (which follows the Scottish Government's statutory process).
- **Listed buildings:** Scotland has over 47,000 listed buildings, with a mix of private, public and third sector ownership. Many will be maintained and operated for a non-heritage use (e.g. as a home, a business or a public building like a swimming pool). Listing is a reactive process based on a submitted case, rather than a definitive list of Scotland's most significant historic buildings. As such, listing rates and recognition of heritage assets will vary between authority areas.
- **Traditional buildings:** establishing the total number of traditionally constructed buildings in Scotland, and consequentially the investment and skills required to maintain and adapt them, is problematic at national level and further work is required. There is no single, definitive source to establish the full stock of pre-1919 buildings. The best identified source is the commercial GEOMNI database which suggests that 10-20% of Scotland's residential stock and up to a quarter of employment space is in buildings constructed pre-1919, or with elements dating from that period. Around 40% of the database is not classified by age, though GEOMNI advise that this is predominantly non-occupiable structures such as bridges and transport infrastructure. However, there is a significantly higher rate of gaps for rural and island areas for both residential and employment space which will have to be supplemented with local data and knowledge.
- **Lower levels of disrepair:** The Scottish House Condition Survey showed that over the period 2017-2019 the Island Authorities had significantly lower shares of urgent and critical disrepair to traditionally built residences than the Scottish average.

- **Higher climate-related risks:** 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.

Economic Links and Impacts

- **Heritage is a key driver of islands tourism:** all the Islands Local Authorities have a higher reliance on tourism in their overall employment mix than the Scottish average (8%). Over a third of international visitors list the historic environment as their main motivation for visiting Scotland, and half of international visitors engage with the historic environment during their visit. Visitors that include a historic environment visit in their trip spent over £3bn in Scotland in 2019. While regional impact estimates are less robust (tables below), they still illustrate the importance of heritage to their key tourism sector:

Tourism Impact comparison VisitScotland Regions, 2019	Visitors spend (£m) (VisitScotland surveys)	SG Sustainable Tourism Businesses Turnover, £m	Gross Heritage Tourism Spend, £m (HES estimate)
Argyll & the Isles	£443	£229	£199
Ayrshire & Arran	£604	£479	£163
Highlands	£1,600	£554	£880
Orkney	£67	£31	£38
Outer Hebrides	£65	£24	£21
Shetland	£36	£11	£18
Scotland Total	£11,246	£8,338	£3.2 Bn

Link of Heritage & Tourism VisitScotland Regions, 2019	% of visitors motivated by Heritage	Rank in motives for visiting area	Implied heritage visitor numbers
Argyll & the Isles	45%	3	2,900,000
Ayrshire & Arran	27%	6	3,000,000
Highlands	55%	3	6,900,000
Orkney	57%	2	100,000
Outer Hebrides	32%	5	70,000
Shetland	49%	3	40,000
Scotland average	50%		

- **Tourism strategy development:** The way that different tourists (e.g. cruise ship visitors, campervan visitors, B&B visitors, family visitors, activity visits) spend on the islands varies, as it does with different visitor types on the mainland sites. The sector is working with VisitScotland and other local bodies

to develop a national sustainable tourism approach and establish the best role for heritage through the existing OPiT Heritage Tourism Group.

- **Islands construction impact:** SHEA (Scotland's Historic Environment Audit) reports an estimated £1.2 billion is spent on repair & maintenance of traditionally constructed buildings in Scotland each year, with further employment benefits along the supply chain. Further work is required to establish the share of this total that is invested in R&M on Scottish islands, but it is likely to be a notable local employer. This is being explored through the current OPiT Skills Group.

Language impact

- **Use of Gaelic in Island Communities:** According to the 2011 Census Data (2022 results are forthcoming), 98% of Scottish people do not have Gaelic language skills. Of those that do, 27% are based in an island community meaning that island communities represent a strong concentration of Gaelic speakers and cultural heritage. This should be factored into the delivery of the strategy, and a Gaelic version of the strategy is planned to reflect the importance of Gaelic to our historic environment.

In conclusion, there is scope for wider recognition of some of the additional challenges islands face in the new strategy: their relative exposure to climate related deterioration of built stock, their higher maintenance cost base and relative exposure to heritage tourism to sustain local employment. However, there is nothing identified in our approach which is likely to have effects on island communities which are significantly different from those on other communities (including other island communities).

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?

On 16 February 2022, the then Minister for Culture, Europe and International Development, Neil Gray, wrote to commission Historic Environment Scotland (HES) to conduct a review of OPiT, involving stakeholders, partners, and communities from within and outside the sector in its design. HES established a project team to coordinate the review process, including Scottish Government Officials, Built Environment Forum Scotland (BEFS), and National Lottery Heritage Fund.

The consultation process was initiated at the June SHEF meeting (Scotland's Historic Environment Forum), with an introduction by the Minister, and involved over 100 participants from across the sector participating in themed workshops.

An extensive engagement period was undertaken which continued during the public consultation. Events were carried out in person and online. It engaged with the following which included Islands authorities and representative groups:

- Local authorities
- Development Trusts
- Academic institutions
- Third Sector organisations
- Community Groups
- Destination Management Organisations
- Enterprise Agencies
- Local interest groups
- Representative bodies and intermediaries
- Visitor attractions
- Businesses
- Other NDPB's and Government agencies

April 2023 Update:

- Engagement events were held both pre and during public consultation, in total these engaged with 649 individuals directly and 191 organisations via 19 workshops, with a mix of online and in person events.
- Virtual engagements were targeted specifically at islands communities, with two online workshops, one in August 2022 (pre public consultation) and one in February 2023 (during public consultation). Questions were specifically asked on delivery and on local impact. In the August workshop, one of the facilitators was a fluent Gaelic speaker to ensure participants could converse in Gaelic if they wished.
- With an average total attendance of 18, 57% of those attending the online workshops were from island communities, thus forming a strong representation. Across both workshops, 345 people from islands were invited.
- Representatives from the Highlands and Islands Enterprise, Orkney Islands Council, West of Scotland Regional Equality Council, University of Highlands and Islands, The Highland Historian, and Shetland Amenity Trust attended at least one event and advocated on behalf of island communities.
- From the workshops, attendees liked recognition that the strategy might impact on different communities in different ways, but cautioned that island communities should not be burdened by prescriptive strategy constraints.
- The public consultation was from 28 November 2022 to 20 February 2023. There were 137 formal written responses to it. Organisational responses representing Island interests included Bòrd na Gàidhlig, Shetland Amenity

Trust, Argyll & Bute Council, Shetland Council, Highland and Islands Enterprise, and Barra Distillery. As well as many other national organisations and professional representative bodies, who work across the islands.

- A specific question was asked in the consultation on what impact the strategy might have on people in islands communities. Overall, a majority of respondents (42%) felt the strategy would have a positive impact on island communities, with a minority (5%) believing it would have a negative impact and 18% believing it would have no impact.
- There were several comments that expressed a wish for greater engagement with island communities, but it is unclear if these respondents were aware of the engagement events which had happened before consultation and during. Additionally, we acknowledge that online events are not suitable for everyone, given resources constraints it was the most pragmatic and inclusive approach within the tight timescales to produce the strategy.
- A minor theme (from a few respondents only) was that some of Scotland's most significant heritage is found in island communities and that the strategy needs to recognise this and ensure that the islands are not disadvantaged with demands that they meet certain standards which might not be achievable.
- A few respondents suggested the strategy needs to recognise the impact of climate change and that this issue leads to other unique impacts on island communities such as increased transport costs or logistical issues in the protection or conservation of heritage assets. Again, respondents felt there is a need for flexibility within the strategy so that island communities can address heritage-related issues with solutions tailored for their specific contexts.
- Conversely, a small number of organisations noted that island communities need the same support as those provided on the mainland.
- Climate change was a strong theme throughout the engagement workshops with many participants seeking to protect and manage assets and ensure the sector can respond to the opportunities of Scotland's Net Zero targets.

These comments have been factored into the revised strategy, where applicable. Moving forward they will be considered in the strategy's delivery mechanisms, which are still being developed.

Step Four: Assessment

Initial Assessment

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** – some islands will have different circumstances, in the same way that different communities across Scotland will have different circumstances, and OPOF will plan to take the same approach to challenges regardless of location, adapting and tailoring as necessary.

Are these different effects likely or significantly different? **No (see above)**

Could the effect amount to a disadvantage for an island community compared to the mainland or between island groups? **No**. There will be different pressures across communities in Scotland, but there is no evidence that OPOF's inclusive approach will disadvantage island communities.

If your answers are NO to the above questions a full ICIA will be NOT be required and you can proceed to the final step.

April 2023 Update

Following consultation, this assessment has been reviewed. All answers are still “No” based on the evidence available from the engagement process and consultation responses: a full ICIA is not required as no material impacts on the Island Communities have been identified.

ICIA: Recommendations for shaping the new strategy

Please state how any adjustments are going to be made to your work to mitigate any effects on Island Communities. If no adjustments will be made please state this and include any justification.

While no significant issues were identified around the design approach necessitating a significant change or mitigation, there is scope for wider recognition of some of the additional challenges islands face as we move towards delivery of the strategy, including their higher cost base, relative reliance on tourism and local capacity. This will be factored into delivery of the strategy and any operational or action plans that derive from it.

Given the high level of the strategy, and reflecting on consultation comments and engagement, the uniqueness of the islands has been addressed formally in the final strategy via a written acknowledgement that island communities face different pressures, as indeed all communities across Scotland will face different local circumstances. These differences will be factored into OPOF's ongoing engagement approach and through delivery of the strategy.

Approved by	Job Title	Date
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