

A white line graphic starts at the top center, descends steeply to the right, then curves slightly to the left and then back to the right, ending at the right edge of the page.

HISTORIC ENVIRONMENT SCOTLAND CORPORATE PLAN 2019-22

STRATEGIC ENVIRONMENTAL ASSESSMENT
POST ADOPTION STATEMENT

3 April 2019

To: sea.gateway@gov.scot

SEA Gateway
The Scottish Government
Area 2-H South
Victoria Quay
Edinburgh EH6 6QQ

A SEA Post Adoption Statement is attached for the plan, programme or strategy (PPS) entitled: Historic Environment Scotland – Corporate Plan 2019-22

The Responsible Authority is: Historic Environment Scotland

Contact:

Andrew Stevenson
Historic Environment Scotland
Salisbury Place
Edinburgh EH9 1SH

andrew.stevenson2@hes.scot

0131 668 8960

Contents

1. The HES Corporate Plan

1.1 Introduction

2. Strategic Environmental Assessment process

2.1 Introduction

2.2 Structure of this Post Adoption Statement

3. Opinions expressed during the consultation

3.1 The consultation process

3.2 Comments on the Environmental Report

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

4.1 Key findings of the Environmental Report

4.2 Alternatives

4.3 Comments from the Consultation Authorities

4.4 Our response to other representations on the Environmental Report

4.5 Environmental mitigation & enhancement

4.6 Monitoring

4.7 Finalisation of the Corporate Plan

1. Introduction

Historic Environment Scotland were established by The Historic Environment Scotland Act 2014. Our general function as set out in the Act is to investigate, care for and promote Scotland's historic environment.

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.

Our first Corporate Plan (2016-19) looked at our priorities for the whole of Scotland. As the first Corporate Plan for a new body it focused on setting up the framework for the new body going forward, introducing the 5 Strategic Themes that will inform all of our work. These 5 themes continue to be the core expression of what Historic Environment Scotland does and informs everything we do.

Our second Corporate Plan continues the 5 strategic themes of Lead, Understand, Protect, Value and Perform and sets our vision for the plan period and the 5 strategic outcomes we want to achieve. All of these play their part on delivering on Our Place in Time: The Historic Environment Strategy for Scotland which is the high level framework that sets out the 10 year vision for Scotland's historic environment.

As one element of the development of our Corporate Plan, we launched a consultation on 31 August 2018 which ran until 2 November 2018. This gave stakeholders an opportunity to provide their views on various elements of the draft Corporate Plan such as our strategic outcomes and priorities. We also ran two consultation events and 4 roadshows and promoted the consultation in the national and regional press, and via social media to encourage as many responses as possible to the consultation

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 Environmental Report which documented the potential significant effects of the draft Corporate Plan was made available for consultation alongside the draft Plan.

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.

3. Opinions expressed during the consultation

3.1 The consultation process

We consulted on our draft Corporate Plan between 31 August 2018 and 2 November 2018. A total of 84 consultation responses were received; 65 from individuals and 19 from organisations.

Table 1.1: Profile of consultation responses

Respondent group	Number
Total organisations	19
Local authority	2
Organisation, public body or charity	12
Private business	2
Other	3
Individuals	65
Total	84

HES also ran two consultation events and 4 roadshows and promoted the consultation in the national and regional press, and via social media to encourage as many responses as possible to the consultation

3.2 Comments on the Environmental Report

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

‘have the key issues associated with the environmental implications of the draft plan been identified?’

Respondent group	Number		
	Yes	No	No response
Total organisations (19)	11	2	6
Local authority (2)	-	-	2
Organisation, public body or charity (12)	9	1	2
Private business (2)	1	1	-
Other (3)	1	-	2
Individuals (65)	27	1	37
Total	38	3	43

Only 6 respondents opted to provide any further commentary in support of their response. One organisation commented that although a strategic environmental assessment has been undertaken, they felt that the natural environment did not feature within the Corporate Plan and suggested that the Corporate Plan should include information on how HES intends to proceed in the light of its commitment to the UN Sustainable Development Goals reflected within the National Performance Framework.

Another organisation felt that the plan should be more explicit in relation to information about managing and mitigating the effects of climate change; while they acknowledged that this will be referred to in the Annual Operating Plan, they noted that because it is not covered in the Corporate Plan, its importance is underplayed.

An individual commented that HES's role as a regulator working alongside SNH and SEPA is not covered in the Corporate Plan. A private business noted that the environmental assessment is too vague.

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

4.1 Key findings of the Environmental Report

The focus of our Corporate Plan is on outcomes and is a response to the high level of engagement that has been carried out in its preparation. The high level nature of the plan and its assessment therefore mean that it is important that we consider the potential for significant environmental effects as a result of the actions, activities and strategies that we carry out in delivering the plan's objectives. In light of this the plans, programmes and strategies that are prepared over the plan period will be required to be considered for qualification under the Environmental Assessment (Scotland) Act 2005 on a case by case basis and, where applicable, a full assessment will be carried out.

The assessment was an iterative process with the process testing the wording of the outcomes as they were drafted. A key part of this process was proposing more detailed content of the plan to allow for meaningful assessment of the outcomes. Overall our assessment found that many of the priorities identified within the plan are likely to have significant positive effects, particularly in relation to the historic environment, access and climatic factors topics. We have not identified any potentially significant negative effects.

4.2 Alternatives

It is a requirement of the 2005 Act that reasonable alternatives be considered during the SEA process. The commitment to prepare a Corporate Plan is established in the Historic Environment Scotland Act 2014. Strategic alternatives to the preparation of our Corporate Plan are therefore relatively constrained and the 'do nothing' approach was not considered to be reasonable in this case. Alternatives considered during the preparation of our plan have included carrying forward commitments from our existing Corporate Plan or different approaches to the structure and level of detail.

Some of the objectives included in the Corporate Plan are considered to have positive or neutral environmental effects. There are also a number of effects that are identified as being neutral or positive/negative. This is due to the level of detail available at this level and consideration will need to be given to these areas further down in our plan hierarchy. We will therefore consider the plans, programmes and strategies that we will prepare over the plan period for further environmental assessment.

4.3 Comments from the Consultation Authorities

The SEA Act requires Responsible Authorities to engage with the statutory Consultation Authorities for SEA¹. 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>Consultation Authority</i>		<i>HES Response</i>
<i>Scottish Natural Heritage</i>	<p>The method followed in the Environmental Report is clear and is concisely presented. We note and appreciate the inclusion of the additional points on topics and baseline data that we suggested in our Scoping Consultation response.</p> <p>We agree with your findings in the environmental assessment. As you note, the draft Corporate Plan is aspirational and we agree with the recommendation that the next level will require more detailed assessment. The Environmental Report will provide an appropriate framework for this.</p> <p>The environmental assessment has identified the key issues required. The Report acknowledges the linkages between cultural and natural heritage. We particularly welcome this, and look forward to continuing to work with you to help maximise the benefits they combine to provide, especially in placemaking and preventative spend.</p> <p>One area likely to require consideration at the more detailed level is coastal erosion (referred to on pages 11 and 14), given the potential threat to assets. The Scottish Climate Change Adaptation Plan and the National Coastal Change Assessment project could provide useful bases for assessing effects and management options.</p>	<p>Noted with thanks. In terms of next level assessment the plans, programmes and strategies that are prepared over the plan period will be considered for qualification under the Environmental Assessment (Scotland) Act 2005 on a case by case basis and, where applicable, a full assessment will be carried out.</p>
<i>The Scottish Environment Protection Agency (SEPA)</i>	<p>We have considered the submitted ER and we are content with the adequacy and accuracy of the assessment undertaken and with the conclusions presented within the report. We are pleased to note that the issues we raised at the scoping stage have been taken forward in the assessment, particularly with regards to the relationship between material assets and climatic factors. We welcome that this has been addressed through the consideration of resource use and waste reduction within the topic of climatic factors.</p>	<p>Noted with thanks</p>

¹ The [Consultation Authorities](#) 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

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 recommendations we had identified and are taking forward. It is accepted that the high level nature of the plan and its assessment make it challenging to be specific in relation to the assessment findings. This is reflected in the findings and has been noted as an area where the lower level plans, programmes and strategies will add further detail. In light of this these plans will be considered for their potential for environmental effects with full assessment carried out where required.

The Corporate Plan recognises the challenges associated with climate change and contains a specific commitment to making responding to these challenges central to our policy and practice. This is reflected in the significant positive effects predicted for the climate change topic against the strategic outcome “The historic environment is looked after, protected and managed for the generations to come”.

In relation to comments on the natural environment at the scoping stage of the SEA it was agreed with Scottish Natural Heritage that significant effects on biodiversity, flora and fauna as a result of our Corporate Plan were unlikely. The assessment has therefore not considered this environmental topic.

4.5 Environmental mitigation & enhancement

As the environmental assessment notes, the openness of the priority actions are such it was 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 our strategic outcomes in preparing lower level plans, programmes and strategies.

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 them to take appropriate remedial action.

While no specific negative effects have been predicted through our assessment it will still be important to understand how our plan 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 of our plan will rely on the Key Performance Indicators that are presented in our Corporate Plan. These indicators describe what success will look like and will be underpinned by targets set out in our annual operating plans. Our performance against these will be published each year in an Annual Report.

4.7 Finalisation of the Corporate Plan.

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.



OGI

© Historic Environment Scotland 2019

You may re-use this information (excluding logos and images) free of charge in any format or medium, under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit <http://nationalarchives.gov.uk/doc/open-government-licence/version/3> or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: psi@nationalarchives.gov.uk. Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

Any enquiries regarding this document should be sent to us at:

Historic Environment Scotland
Longmore House, Salisbury Place
Edinburgh, EH9 1SH
+44 (0) 131 668 8600
www.historicenvironment.scot
Scottish Charity No: SCO45925
VAT Number: GB 221 8680 15

You can download this publication from our website at www.historicenvironment.scot. We are committed to ensuring this publication is accessible to everyone. If you need it supplied in a different format or language, please get in touch.