



*We safeguard the nation's historic environment and promote its understanding and enjoyment*

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Dear Mr Urquhart

**Environmental Assessment (Scotland) Act 2005  
Clackmannanshire Council Sustainability Strategy  
Scoping Report**

Thank you for consulting Historic Scotland on the Scoping Report prepared for the environmental assessment of Clackmannanshire Council's Sustainability Strategy, received by the Scottish Executive SEA Gateway on 9 July 2007.

I have reviewed the Scoping Report on behalf of Historic Scotland in its role as a Consultation Authority under the above Act (Section 15). This letter contains the views of Historic Scotland on the scope and level of detail of the information to be included in the Environmental Report (part 1), and the duration of the proposed consultation period (part 2). I have also provided detailed comments on the Scoping Report in the annex to this letter.

**1. Scope of assessment and level of detail**

- 1.1 I found the Scoping Report to be helpful and, subject to the specific comments set out below and in the annex, I am content with the scope and level of detail proposed for the environmental assessment.
- 1.2 My understanding from the Scoping Report is that the environmental assessment will include assessment of the strategic actions included within the Sustainability Strategy. For the avoidance of any doubt, I would expect the assessment to include all aspects of the strategy that are likely to have significant environmental effects, including for example policies or proposals.
- 1.3 When undertaking the environmental assessment, you may find that some impacts are uncertain at the strategic level, for example due to dependence on locational factors.


Where this is the case it is important to identify these issues and to be clear how they will be taken into account at the lower level, for example at project level, and who will be responsible for following them through. On the other hand, it negates the purpose of SEA to always “park” assessment of impacts until the project stage, as one of the purposes of SEA is to avoid impacts at project level by assessing at the strategic level. A balanced approach is needed.

## 2. Consultation period for the Environmental Report

- 2.1 I am content with the six-week period proposed for consultation on the Environmental Report. Please note that, for administrative purposes, Historic Scotland consider that the consultation period commences on receipt of the relevant documents by the SEA Secretariat.
- 2.2 At the Environmental Report stage, I would prefer to receive paper copies of the report and the draft Sustainability Strategy, both of which should be sent via the Scottish Executive Gateway in line with the procedures set out in the SEA Tool Kit (available at [www.scotland.gov.uk/Publications/2006/09/13104943/45](http://www.scotland.gov.uk/Publications/2006/09/13104943/45)).

None of the comments contained in this letter should be construed as constituting a legal interpretation of the requirements of the SEA Act. They are intended rather as helpful advice, as part of Historic Scotland’s commitment to capacity-building in SEA. Should you wish to discuss this response please do not hesitate to contact Jennifer Craig on 0131 668 8832.

Yours sincerely



Amanda Chisholm  
Strategic Environmental Assessment Team Leader

## Annex A: Detailed comments on the Scoping Report

For ease of reference the comments in this annex follow the same order as the Scoping Report.

### Description of strategy contents

1. I found the information contained in this section helpful.
2. I note that the historic environment is not explicitly included within either the themes or the subjects to be covered by the strategy. Good stewardship of the historic environment contributes to sustainable development through, for example, addressing wider issues like energy conservation (maintaining and using existing resources) and recycling (re-use of buildings and materials). The use of local resources, traditional materials and skills can also help reduce the impact of transportation. The historic environment also makes an important contribution to economic and social well-being, and both tourism and the re-use of buildings significantly contribute to economic regeneration. The historic environment offers many opportunities for local participation and lifelong learning for the community. Historic character plays a significant part in local diversity and distinctiveness and is a major factor in our sense of place and cultural identity. All this adds significantly to our quality of life and is a vital part of creating a sustainable society.

### Context of the Sustainability Strategy

*Relationship with other plans, programmes or strategies (PPS) and environmental objectives*

3. Appendix 3 set out the plans, policies, programmes and strategies to be reviewed for their relationship with the strategy. As part of this review you may also wish to consider the following documents that contain environmental protection objectives for the historic environment:
  - *Scottish Historic Environment Policy 1. Scotland's Historic Environment* (available at <http://www.historic-scotland.gov.uk/shep1-3.pdf>)
  - *Scottish Historic Environment Policy 2. Scheduling: protecting Scotland's nationally important monuments* (available at <http://www.historic-scotland.gov.uk/shep2.pdf>)
  - NPPG 5 Archaeology and Planning
  - NPPG 18 Planning and the Historic Environment
  - *Passed to the Future*, which is Historic Scotland's policy for the sustainable management of the historic environment (available at <http://www.historic-scotland.gov.uk/index/policyandguidance/policypublications/operationalpolicies.htm>) (Note that the policy elements of this document have been superseded by SHEP1).
4. In summary, the key environmental protection objective of the legislation and policy framework for the historic environment is 'to protect and, where appropriate, enhance the historic environment'.

### *Scoping in/out of SEA issues*

5. I note that all of the environmental parameters identified in Schedule 2 of the Act are scoped in to the assessment.

### *Relevant aspects of the current state of the environment*

6. The list of baseline information provided in this section adequately covers the features of the historic environment that we would wish to see assessed.
7. Simply for information, Historic Scotland is in the process of undertaking an audit of the historic environment in Scotland (<http://www.heritageaudit.org.uk>). Although the results are not available for this assessment, the audit will likely assist in identifying trends, problems and issues in future assessments.

## **Scope and level of detail proposed for the environmental assessment**

### *Methodology for assessing environmental effects*

8. I note that SEA objectives will be used to assess the effects of the strategic actions included in the strategy. As noted in the accompanying letter, if there are any other aspects of the strategy (e.g. objectives, policies etc) that could have significant environmental effects then I would expect these to be included in the assessment. The SEA should also consider the environmental effects of any alternative options that have been considered as part of the strategy development process.
9. I note that the historic environment is grouped with landscape as an assessment topic. While we encourage an holistic, landscape-scale approach to integrated land management, we consider that the effects on the historic environment should be assessed separately from those on landscape. We have found that the conjoining of the assessment in other Environmental Reports can make it difficult to ascertain the impacts on the historic environment.
10. Section 5.1 sets out the SEA objectives that will be used to assess the Sustainability Strategy. SEA objective 15 will be used to assess the effects of the strategy on the historic environment and I suggest the following amendments to allow consideration of potential effects on the setting of historic environment features: “protect historic buildings *and their settings*, archaeological sites *and their settings* and other culturally important features”. Alternatively, you may wish to simplify the SEA objective to “protect and, where appropriate, enhance the historic environment” which would capture these issues.
11. I agree that it is appropriate to use professional judgement to predict the environmental effects of the strategy. It may be useful to explore any tensions between the environmental aspect of sustainability with the social or economic aspects in the assessment.
12. I note that the assessment will be reported using a matrix approach, and welcome the inclusion of a commentary box in the proposed assessment matrix in Appendix 6. This

will assist in making the assessment transparent and the results accessible to the general reader.

13. I note your intention to develop proposals to mitigate the environmental effects of the strategy. As you will be aware, mitigation may involve making changes to the strategy and/or developing more detailed mitigation proposals to be implemented as the strategy is delivered. It would be helpful in the Environmental Report to clearly describe any changes made to the strategy as a result of the environmental assessment, and to clearly set out any recommendations/expectations for lower level plans, projects or activities that are identified as mitigation measures. It would also be helpful to identify in the report who will be responsible for ensuring that the mitigation measures are taken forward as the strategy is implemented.
14. Appendix 4 sets out the indicators proposed to monitor the environmental effects of the strategy. For the historic environment, this includes the ‘percentage of listed buildings and archaeological sites at risk’. You may be aware that the principal purpose of the ‘Buildings at Risk Register for Scotland’ is to assist the sale or lease of historic buildings in need of rescue, by publishing details of them from its database to a wide range of potential restoring purchasers or tenants. It may not include all of the buildings that are potentially at risk in a particular area. The removal of buildings from the Buildings at Risk Register is likely to be influenced by many factors in addition to this strategy, and so this is perhaps best considered as a proxy indicator. I am aware that the term “archaeological sites at risk” is used in the guidance on SEA published by the Office of the Deputy Prime Minister in 2005; however, I should point out that HS does not currently hold such information per se. The local authority archaeologist (Lorna Main, [mainl@stirling.gov.uk](mailto:mainl@stirling.gov.uk)) may be able to assist in identifying sites of this type (if any) in Clackmannanshire. I would be happy to discuss this issue further if you would find it helpful.

