



HISTORIC
ENVIRONMENT
SCOTLAND

ÀRAINNEACHD
EACHDRAIDHEIL
ALBA

DESIGNATIONS STRATEGY - ISLAND COMMUNITIES IMPACT ASSESSMENT

*HES 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 acts¹ 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 Heritage Directorate to undertake a strategic review to consider whether the current system and approach is the right one. Our draft strategy is intended to address the findings of our review and to align with and contribute to the strategic priorities of the strategic priorities of

¹ 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 Past Our Future](#), our Corporate Plan '[Heritage for All \(2025-28\)](#)', and [HES Equalities Outcomes Report 2025-29](#).

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

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 deliver better heritage outcomes and wider community benefits.

It sets out a mission:

‘HES leads on identifying, protecting, and providing information about Scotland's most significant historic places. Our work supports planning authorities and others to make well-informed 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 and success measures:

Objective 1: Looking ahead - HES will lead a collaborative and inclusive conversation to develop and publish long-term (10-year) priorities for heritage protection by March 2028.

Objective 2: Improving our information - by March 2028, enhance the clarity and accuracy, accessibility and useability of our data and designation records so that Scotland's historic protected places are well-understood and valued.

Objective 3: Improving our service - redesign our public offering to deliver timely decisions, publishing details of a revised approach in 2025/26.

Objective 4: Understanding our impact - by March 2027, capture and communicate baseline evidence and insights into the impacts of the current systems of heritage protection.

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

- Information on designated assets in the islands including a map search is available from our heritage portal – portal <https://portal.historicenvironment.scot/apex/f?p=PORTAL:HOME>
- 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. Where we have cases in locations at the furthest distance from our staff offices in Edinburgh, we may group these together to

make our site visits most cost effective. This may have implications for timescales but applies equally to mainland sites far from Edinburgh, 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 cases² 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 Cumbræes. 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,³ 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.

We intend to use the 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

² 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.

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

communities. We can then consider if any mitigations are required when we finalise our 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?*

The development of the draft strategy follows 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.

We intend to consult widely on the draft strategy and will be writing directly to local authorities, including island authorities, and a wide range of heritage and planning stakeholders to invite their views. We will ensure that organisations such as the Scottish Islands Federation, Development Trusts Association Scotland, Bòrd na Gàidhlig are included on the invite list.

During the public consultation, we are planning to hold an event(s) with heritage/planning stakeholders and equalities groups. We will make sure that we include an online option to facilitate participation by people living in islands communities.

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:

- Does your assessment identify any unique impacts on island communities? **Yes/No**
- Does your assessment identify any potential barriers or wider impacts? **Yes/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? **Yes/No**
- Are these different effects likely? **Yes/No**

- Are these effects significantly different? **Yes/No**
- Could the effect amount to a disadvantage for an island community compared to the mainland or between island groups? **Yes/No**

The following sections will be completed as appropriate following consultation.

STEP FIVE: FULL ASSESSMENT – PREPARING YOUR ICIA

In Step Five, you should describe the likely significantly different effect of the policy, strategy or service.

- Assess the extent to which you consider that the policy, strategy or service can be developed or delivered in such a manner as to improve or mitigate, for island communities, the outcomes resulting from it.
- Consider alternative delivery mechanisms and whether further consultation is required.
- Describe how these alternative delivery mechanisms will improve or mitigate outcomes for island communities.
- Identify resources required to improve or mitigate outcomes for island Communities. To form your opinion, the following questions should be considered and any further explanation or evidence provided below:

STEP SIX: FULL ASSESSMENT – MAKING ADJUSTMENTS TO YOUR WORK

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.

- Should delivery mechanisms/mitigations vary in different communities?
- Do you need to consult with island communities in respect of mechanisms or mitigations?
- Have island circumstances been factored into the evaluation process?
- Have any island-specific indicators/targets been identified that require monitoring?
- How will outcomes be measured on the islands?
- How has the policy, strategy or service affected island communities?
- How will lessons learned in this ICIA inform future policy making and service delivery.

STEP SEVEN: PUBLISHING THE ICIA

If it is decided that an ICIA is required it should be completed based on the evidence provided above using an approved template. You may want to consider whether the ICIA should be published in Gaelic. There will also be a requirement to ensure an accessible version of the document is produced. This step should not be undertaken without consulting Heather Macnaughton, Strategic Partnerships Manager.

On completion of an initial draft please send this completed document to Heather Macnaughton, Strategic Partnerships Manager for review and feedback. Once your assessment is finalised it will need to be signed off by the strategy, policy or service lead and/or the relevant head of department.

It will then be logged for reporting purposes to the Scottish Government and subsequently published on our website along with the strategy, policy or service documents.

Approved by	Job Title	Date