

POST-ADOPTION SEA STATEMENT – COVER NOTE

PART 1

To: SEA.gateway@scotland.gsi.gov.uk

or

SEA Gateway
Scottish Executive
Area 1 H (Bridge)
Victoria Quay
Edinburgh EH6 6QQ

PART 2

A post-adoption SEA statement is attached for the PPS entitled:

Orkney Islands Local Transport Strategy

The Responsible Authority is:

Orkney Islands Council

PART 3

Contact name Eileen Summers

Job Title Transport Planner

Contact address Transportation Service
Department of Development Services
Orkney Islands Council
School Place
Kirkwall
Orkney KW15 1NY

Contact tel. no 01856 873535

Contact email eileen.summers@orkney.gov.uk

Signature & date Eileen Summers 11 April 2007

POST - ADOPTION SEA STATEMENT

Post-adoption SEA statement for: Orkney Islands Local Transport Strategy

Adopted on:

05 April 2007

Responsible Authority:

Orkney Islands Council

POST-ADOPTION SEA STATEMENT INTRODUCTION

This document (referred to here as the post-adoption SEA statement) has been prepared in accordance with Section 18 of the Environmental Assessment (Scotland) Act 2005.

POST-ADOPTION SEA STATEMENT AVAILABILITY OF DOCUMENTS

WEBSITE

The full PPS as adopted, along with the Environmental Report and post-adoption SEA Statement are available on the Responsible Authority's website at:

www.orkney.gov.uk

OFFICE ADDRESS

The PPS, as adopted, along with the Environmental Report and post-adoption SEA Statement may also be inspected free of charge (or a copy obtained for a reasonable charge) at the principal office of the Responsible Authority:

Contact name, address and telephone number

Eileen Summers
Transportation Service, Council Offices, School Place, Kirkwall, Orkney KW15 1NY
Tel. 01856 873535

Times at which the documents may be inspected or a copy obtained:

Monday to Friday between the hours of 0900 and 1700.

**POST-ADOPTION SEA STATEMENT
KEY FACTS**

Name of Responsible Authority	Orkney Islands Council
Title of PPS	Orkney Islands Local Transport Strategy
Purpose of PPS	The LTS is a transport action plan for meeting local challenges and objectives. It will present roles and responsibilities, and feed into and from Regional and National Strategies, linking to other sectors where there are complementary and/or conflicting objectives.
What prompted the PPS (e.g. a legislative, regulatory or administrative provision)	Local transport strategies are prepared by local authorities in Scotland and submitted to the Scottish Executive on a voluntary basis since there is no legislative, regulatory or administrative provision requiring their production. However, transportation authorities often incorporate their strategies for road traffic reduction into LTS, and these strategies are required under the terms of the Road Traffic Reduction Act.
Subject (e.g. transport)	Transport and travel
Period covered	2007-2010
Frequency of updates	Upon guidance from Scottish Executive. Anticipated every 3 years.
Area of PPS (e.g. geographical area)	The LTS covers the administrative area of the Orkney Islands and its links with the Shetland Isles and the Scottish Mainland.

Summary of nature/content of PPS

The overarching aim of the Orkney Islands Local Transport Strategy is to enhance the present transport service, making it safer, more efficient and more accessible, and to encourage and enable the uptake of more sustainable forms of transport such as walking and cycling. No major increase in service provision is anticipated during the period of the Strategy.

Date adopted

05 April 2007

**Contact name & job title
Address, email, telephone number**

Eileen Summers
Transport Planner
Transportation Services
Orkney Islands Council
School Place, Kirkwall
Orkney
Tel. 01856 873535
eileen.summers@orkney.gov.uk

Date

05 April 2007

STRATEGIC ENVIRONMENTAL ASSESSMENT PROCESS

The Orkney Islands Local Transport Strategy has been subject to a process of Strategic Environmental Assessment (SEA), as required under the Environmental Assessment (Scotland) Act 2005. This has included the following activities:

- Taking into account the views of the Scottish Environment Protection Agency, Scottish Natural Heritage and the Scottish Ministers (Historic Scotland) regarding the scope and level of detail that was appropriate for the Environmental Report
- Preparing an Environmental Report on the likely significant effects on the environment of the draft PPS which included consideration of:
 - the baseline data relating to the current state of the environment;
 - links between the PPS and other relevant strategies, policies, plans, programmes and environmental protection objectives;
 - existing environmental problems affecting the PPS;
 - the plan's likely significant effects on the environment (positive and negative);
 - measures envisaged for the prevention, reduction and offsetting of any significant adverse effects;
 - an outline of the reasons for selecting the alternatives chosen;
 - monitoring measures to ensure that any unforeseen environmental effects will be identified, allowing for appropriate remedial action to be taken.
- Consulting on the Environmental Report
- Taking into account the Environmental Report and the results of consultation in making final decisions regarding the PPS
- Committing to monitoring the significant environmental effects of the implementation of the PPS. This will also identify any unforeseen adverse significant environmental effects and enable appropriate remedial action to be taken.

**POST-ADOPTION SEA STATEMENT
HOW ENVIRONMENTAL CONSIDERATIONS HAVE BEEN
INTEGRATED INTO THE ORKNEY ISLANDS LOCAL
TRANSPORT STRATEGY AND HOW THE ENVIRONMENTAL
REPORT HAS BEEN TAKEN INTO ACCOUNT**

Environmental problems addressed in the Environmental Report

The following paragraphs describe environmental problems which were identified in the Scoping Report and addressed in the Environmental Report, and how they have subsequently been taken into account in the Strategy.

1. Localised congestion occurs at key times of the day, mainly when people are travelling to and from work, and especially in the towns of Kirkwall and Stromness. It was considered that in certain weather conditions this may lead to localised areas of reduced air quality.

Air quality monitoring data obtained from the Environmental Health Department indicated that, at all times, the air quality values recorded in both towns have met the standard required by the Air Quality Limit Values (Scotland) Regulations 2003.

A number of the sub-strategies however, e.g. Active Travel, Bus Services and Community & Voluntary Transport and Smarter Choices, include interventions which will encourage a reduction in use of the private car through increasing the attractiveness of walking, cycling and using public transport and by the preparation of Travel Plans. Both towns will also benefit from implementation of Traffic and Parking intervention TP3, *Review and develop a parking strategy for Orkney*. The congestion problems in Kirkwall, the larger of the two towns which suffers worst, are also addressed in the Traffic and Parking sub-strategy by intervention TP1, *Manage traffic in and around Kirkwall*.

2. Most of the road network in Orkney does not feature sustainable drainage, and water and other substances drain directly from roads into ditches.

Water quality data obtained from SEPA showed that, of the watercourses monitored, 85% are classified as either A1 or A2 and there is no indication that road transport is responsible for the lower classification of the remaining 15% of watercourses monitored.

The aim of the sub-strategies mentioned above (Active Travel, Bus Services etc.) is to reduce the number of private cars on roads throughout Orkney which would in turn result in lower levels of pollutants in road run-off.

The Strategy promotes consideration of the inclusion of sustainable drainage systems at the planning stage of any new development.

3. The application of salt to the roads to combat icy conditions may impact upon the flora and fauna in the vicinity of roads.

Intervention, TS1, *Review and update the Winter Maintenance Policy and Plan annually*, which forms part of the Travelling Safely sub-strategy, describes how operational decisions made by the Roads Operations Section will be informed by weather forecasts using thermal mapping and road sensors. The operators of road treatment vehicles also receive training in the calibration of salt spreaders. These factors will help avoid over-use of salt on the roads.

4. Construction of new infrastructure can result in damage to, or loss of, natural heritage, including the marine environment.

New developments should avoid SSSIs and other sensitive sites. Design / implementation of schemes should mitigate or improve biodiversity (e.g. better connection of green corridors) as well as wildlife protection measures.

In the construction of new and upgraded roads the LTS promotes the use of principles of 'Best Practical Environmental Option' to ensure that, where possible, environmental enhancement is included in schemes, rather than simply mitigation and reduction of adverse effects. Where there is uncertainty concerning the appropriate method to be used, advice will be sought from the relevant source.

The LTS promotes development of a policy in the OIC Local Plan, on the disposal at sea of dredge spoil, such that disposal of dredge spoil should be carried out in areas where it will not impact negatively upon vulnerable marine habitats or the activities of other users of the sea.

Marine works require to be licensed under the Food & Environmental Protection Act and/or the Coast Protection Act. The licensing process includes consultation with organisations such as SNH and SEPA to allow identification of potential environmental issues and, if appropriate, mitigation measures to prevent, reduce or offset damage or disturbance.

5. Works involving excavation and soil disturbance cause physical damage to habitats and, if active remediation is not carried out, these habitats may not return to their former condition.

The LTS promotes the use of principles of 'Best Practical Environmental Option' and, if appropriate, habitat remediation will be included in any works which involve excavation and soil disturbance.

6. Maintenance and management of existing infrastructure may affect local biodiversity, e.g. that of roadside verges.

As part of the Strategy a tailored policy for timing the mowing of roadside verges to allow certain plants to flower has been developed. It is proposed that all main A Class roadside verges will be cut three times per year and all other roads, with the exception of conservation verges, will be cut twice per year.

Negative effects identified during production of the Environmental Report

Climatic factors

Components of the LTS which will likely impact negatively on climatic factors are the interventions relating to Air Services and Ferry Services, Ports and Harbours. Any increase in service provision will result in increased emissions of greenhouse gases, e.g. carbon dioxide (CO₂).

However, the only anticipated/desirable increases in service provision during the period of the Strategy are modest, namely:

1. The encouragement of a daily return service between Kirkwall and Glasgow. However, this is a commercial service over which the Council has no responsibility for setting provision or timetables etc. If such a service level was achieved, this would result in an extra Kirkwall-Glasgow and Glasgow-Kirkwall flight per day (from the present single rotation per day). It was highlighted in the Assessment that this may necessitate longer airport opening hours and therefore the use of increased quantities of runway de-icer during winter, but this is unlikely to occur as any additional flights would tend to be scheduled within the existing operational hours of the airport.
2. An extra weekly sailing (from the one at present) to North Ronaldsay is desirable. This may be fitted into the present timetable (with existing vessels and infrastructure). Because the present operation to the Outer North Isles is at full stretch, any additional sailings hours associated with an additional trip to North Ronaldsay in the week will necessitate reclaiming sailing hours from elsewhere in the timetable. In this way there will be no additional time at sea and therefore only marginal variance in fuel consumption associated with the (sometimes) rougher waters on the passage to North Ronaldsay.

Orkney Islands Council is committed to reducing its carbon footprint. The Council is presently developing a Carbon Management Plan, which will look at how the Council can reduce carbon emissions and offset any increased CO₂ as a result of future interventions, for example in improving the connectivity of the isles to support survival and equality. The Council will undertake studies into:

- the use of alternative fuels, including biofuels;
- the efficiency of ferry engines;
- driver training options; The Council's Department of Technical Services already participates in driver training programmes which are promoted by the Association of Public Service Excellence;
- the introduction of energy conservation measures for the Council's own fleet of vehicles and as part of passenger transport developments; All vehicles in the Department of Technical Services have Euro 4 compliant diesel engines;
- pool cars for Council departments;
- Information Technology solutions;

- hybrid/electric vehicles.

Other aspects of the LTS, e.g. interventions set out under the sub-strategies Active Travel, Bus Services and Community & Voluntary Transport and Smarter Choices and Travel Information will encourage and enable a modal change away from travel by private car, and especially single occupancy of the private car. Realisation of such changes in travel behaviour could result in tangible reductions in CO₂ emissions.

Local Air Quality

The increases in service provision referred to above will also result in negative impact on local air quality but, as the air quality of the area is presently good, it is not anticipated that any impact will be significant.

Biodiversity

Negative impact on biodiversity is possible from interventions which may require construction or maintenance work, e.g. paths and cycle-ways for Active Travel; engineering solutions for Travelling Safely; and construction of lay-bys for Traffic and Parking. Excavation can involve removal of considerable quantities of vegetation and top soil which may disturb damage or destroy species and/or their habitats. To minimise such adverse environmental impact, the LTS new developments will avoid designated areas and other sensitive sites. It is also acknowledged that the design and implementation of schemes should improve biodiversity or habitats as well as including wildlife protection measures.

In the construction of new and upgraded roads the LTS promotes the use of principles of 'Best Practical Environmental Option' to ensure that, where possible, environmental enhancement is included in schemes, rather than simply mitigation and reduction of adverse effects. Where there is uncertainty concerning the appropriate method to be used, advice will be sought from the relevant source.

Possible negative impact on biodiversity (e.g. European Protected Species and Annex II species grey seal and common seal) was also identified under interventions relating to Ferry Services, Ports and Harbours (FPH 3 and 4) due to potential increased movement of ferries. Any increases in ferry activity are forecast to be minimal and so the impact is expected to be slight. Appropriate Assessment has however been carried out to ascertain the expected significance of any impact and to identify suitable mitigation measures.

Dredge spoil is material which, if disposed of inappropriately, can result in significant negative impact on marine habitats such as maerl, and horse mussel *Modiolus modiolus* beds. The LTS promotes development of a policy on the disposal at sea of dredge spoil, such that disposal of dredge spoil should be carried out in areas where it will not impact negatively upon vulnerable marine habitats or the activities of other users of the sea.

Water & Soil

Negative impacts on water and soils are also possible from works resulting from interventions which may require construction or maintenance work, e.g. paths and cycle-ways for Active Travel; road maintenance for Travelling Safely; and construction of lay-bys for Traffic and Parking. Increased suspended solids in watercourses have a blanketing and smothering effect and can damage habitats such as patches of gravel in the bottoms of streams which provide spawning beds for trout. Further sources of damage or disruption to

the habitats of watercourses include engineering works such as culverting or realignment of streams. These may have the effect of creating barriers and isolating populations of species. Any engineering works which could impact upon the water environment will require to be authorised under the Water Environment (Controlled Activities) (Scotland) Regulations 2005 (CAR). If culverting or realignment of streams is considered, SEPA's policy on The Culverting of Watercourses should be consulted.

The Environmental Report acknowledges that pollutants from transport enter the water and soil environments via runoff from roads. However the level of traffic on the roads of Orkney is not considered to be sufficient to cause significant impact to these environments, and the water quality data obtained from SEPA did not indicate that the lower classifications of certain watercourses might have resulted from transport activities. However, to address this issue and also to prevent flooding, the LTS promotes consideration of the inclusion of sustainable drainage systems at the planning stage of any new development.

Landscape

No negative impacts have been identified on the Landscape SEA objective, however any engineering solutions carried out under the Travelling Safely sub-strategy, TS2: *'Improve the safety of travel through a continued combination of road user education, engineering solutions and enforcement'*, must be sensitive to the character of the surrounding landscape. Local Plan Policy LP/T3 Roads states that "The Council will seek to ensure that: (I) the construction of new roads or (II) road improvements in environmentally sensitive areas, are undertaken in a manner which is sensitive to the natural heritage (including landscape character) and/or historic environment of the surrounding area. Where appropriate, visual impact assessments will be required in order to identify the most appropriate design".

Cultural Heritage

The potential for negative impact on historic sites is identified from LR3: *sustain and improve connections in the locally significant network* as this intervention may include some construction work. Excavation work has the potential to disturb and damage archaeological remains. Other interventions which may require construction or maintenance work include paths and cycle-ways for Active Travel; engineering solutions for Travelling Safely and construction of lay-bys for Traffic and Parking. During any excavation work a watch should be kept for the presence of archaeological remains. Local Plan Policy LP/TS Roads, as quoted above, also applies to the Cultural Heritage objective.

Negative effects on the historic environment may also arise from the provision of smaller scale infrastructure such as lighting, street furniture, traffic calming measures or signage as well as from new or improved larger scale infrastructure. All new transport schemes should be designed to avoid adverse effect on historic environment features and their setting, and schemes should be appropriate to the character of the townscape or Conservation Area.

Population

Only one strategy intervention is identified as having potential to impact negatively on population. This is TP1, *'Manage traffic in and around Kirkwall'* from the Traffic and Parking sub-strategy. During recent consultation on the draft Traffic Management Plan produced by Orkney Islands Council's Department of Technical Services the proprietors of

certain shops in Kirkwall had expressed fears that their businesses may be adversely affected by restrictions on access to their premises. A revised Traffic Management Plan is being developed following consideration of these and other impacts highlighted through the consultation on the Plan.

Human Health

No negative impacts have been identified against the Human Health SEA objective.

Material Assets

Many of the strategy interventions are assessed as negative against the Material Assets SEA objective as they may involve the use of aggregates and other road materials. The Roads Department currently transports road planings and other construction waste to Cursiter Quarry from where they are sold as recycled materials. However quarry and road construction resources are currently being reviewed, which will include consideration of internal use of recycled materials in preference to making these available to the wider community.

Mitigation Measures

The environmental issues originally identified in the Scoping Report and further negative impacts identified during SEA of the Local Transport Strategy and described above are summarised in **Table I** along with measures for prevention, reduction and offsetting of significant adverse effects, including any revised measures which have been considered since production of the Environmental Report.

Table 1: Proposed Mitigation Measures

Issue/Impact identified in ER	Mitigation Measure	Lead Authority	Proposed timescale
Increasing levels of greenhouse gases	Studies will be undertaken into: <ul style="list-style-type: none"> • Use of alternative fuels, inc. biofuels • The efficiency of ferry engines • Driver training options; The Council's Department of Technical Services already participates in driver training programmes which are promoted by the Association of Public Service Excellence • The introduction of energy conservation measures for the Council's own fleet of vehicles and as part of passenger transport developments. All vehicles of the Department of Technical Services have Euro 4 compliant diesel engines • Pool cars for Council departments • Use of IT solutions • Hybrid/electric vehicles 	Orkney Islands Council	Measures which are not already in place will be implemented during the course of the Strategy
Localised congestion occurs	A number of the sub-strategies, e.g. Active Travel, Bus Services and Community & Voluntary Transport and	Orkney Islands	During the course of the

Issue/Impact identified in ER	Mitigation Measure	Lead Authority	Proposed timescale
at key times of the day, mainly when people are travelling to and from work, and especially in the towns of Kirkwall and Stromness.	Smarter Choices, include interventions which will encourage a reduction in use of the private car through increasing the attractiveness of walking, cycling and using public transport and by the preparation of Travel Plans. Both towns will also benefit from implementation of Traffic and Parking intervention TP3, <i>Review and develop a parking strategy for Orkney</i> . The congestion problems in Kirkwall, the larger of the two towns which suffers worst, are also addressed in the Traffic and Parking sub-strategy by intervention TP1, <i>Manage traffic in and around Kirkwall</i> .	Council	Strategy
Most of the road network in Orkney does not feature sustainable drainage, and water and other substances drain directly from roads into ditches.	The sub-strategies mentioned above (walking, cycling, public transport etc.) aim to reduce the number of private cars on roads throughout Orkney and this would in turn result in lower levels of pollutants in road run-off.	Orkney Islands Council	During the course of the Strategy
	As part of the Strategy the inclusion of sustainable drainage systems will be considered at the planning stage of any new development.	Orkney Islands Council	Throughout the Strategy period
The application of salt to the roads to combat icy conditions may impact upon the flora and fauna in the vicinity of roads.	Intervention TS1, <i>review and update the Winter Maintenance Policy and Plan annually</i> , which forms part of the Travelling Safely sub-strategy, describes how operational decisions made by the Roads Operations Section will be informed by weather forecasts using thermal mapping and road sensors. This will help avoid over use of salt on the roads.	Orkney Islands Council	During the course of the Strategy
	Operators also receive regular training in the calibration of mechanical spreaders.	Orkney Islands Council	Training is already in place
Construction of new infrastructure can result in damage to, or loss of, natural heritage, including the marine environment. Decline of habitats and species may occur through fragmentation of the countryside.	New developments should avoid SSSIs and other sensitive sites. Design / implementation of schemes should mitigate or improve biodiversity (e.g. better connection of green corridors, incorporation of otter runs) as well as wildlife protection measures. In the construction of new and upgraded roads, the LTS promotes the use of principles of 'Best Practical Environmental Option' to ensure that, where possible, environmental enhancement is included in schemes, rather than simply mitigation and reduction of adverse effects. Where there is uncertainty concerning the appropriate method to be used, advice will be sought from the relevant source.	Orkney Islands Council	During the course of the Strategy

Issue/Impact identified in ER	Mitigation Measure	Lead Authority	Proposed timescale
	<p>Local Plan Policy LP/T3 Roads states that “The Council will seek to ensure that: (I) the construction of new roads or (II) road improvements in environmentally sensitive areas, are undertaken in a manner which is sensitive to the natural heritage (including landscape character) and/or historic environment of the surrounding area.</p> <p>The LTS promotes development of a policy on the disposal at sea of dredge spoil, such that disposal of dredge spoil should be carried out in areas where it will not impact negatively upon vulnerable marine habitats or the activities of other users of the sea.</p>		
<p>Road traffic travelling at speed is hazardous to wildlife. European Protected Species, otter is a potential victim of road kill. Is Orkney Islands Council aware of this being a significant issue for otter?</p>	<p>Orkney Islands Council is not aware of road kill presently being a significant issue for otter.</p> <p>However, several years ago, the Roads Department erected otter crossings on the verges alongside the A961 at Echnaloch in Burray and the A967 close to Loch of Clumley in Sandwick. These consist of fencing posts with reflective triangles attached, and act as a warning to otters during hours of darkness by reflecting the lights of oncoming vehicles.</p>	<p>Orkney Islands Council</p>	<p>Already in place</p>
<p>Works involving excavation and soil disturbance cause physical damage to habitats and, if active remediation is not carried out, these habitats may not return to their former condition</p>	<p>The principles of ‘Best Practical Environmental Option’ will be followed and, if appropriate, habitat remediation will be included in any works.</p>	<p>Orkney Islands Council</p>	<p>During the course of the Strategy</p>
<p>Maintenance and management of existing infrastructure may affect local biodiversity, e.g. that of roadside verges.</p>	<p>As part of the Strategy a tailored policy for timing the mowing of roadside verges to allow certain plants to flower has been developed.</p> <p>It is proposed that all main A Class roadside verges will be cut three times per year and all other roads, with the exception of conservation verges, will be cut twice per year.</p>	<p>Orkney Islands Council</p>	<p>During the course of the Strategy</p>
<p>Construction or maintenance work has the potential to result in increased</p>	<p>Any engineering works which could impact upon the water environment require to be authorised under the Water Environment (Controlled Activities) (Scotland)</p>	<p>Orkney Islands Council</p>	<p>These practices are, and will continue to</p>

Issue/Impact identified in ER	Mitigation Measure	Lead Authority	Proposed timescale
<p>suspended solids in watercourses.</p> <p>Further causes of damage or disruption to the habitats of watercourses are engineering works such as culverting or realignment of streams.</p>	<p>Regulations 2005 (CAR).</p> <p>Engineering or road maintenance works should be carried out according to SEPA's Pollution Prevention Guidelines relating to construction and CAR.</p> <p>If culverting or realignment of streams is considered, SEPA's policy on The Culverting of Watercourses should be consulted.</p>		<p>be, followed.</p>
<p>Excavation work has the potential to disturb and damage archaeological remains.</p> <p>Negative effects on the historic environment may arise from the provision of smaller scale infrastructure such as lighting, street furniture, traffic calming measures or signage as well as from new or improved larger scale infrastructure.</p>	<p>Local Plan Policy LP/T3 Roads states that "The Council will seek to ensure that: (I) the construction of new roads or (II) road improvements in environmentally sensitive areas, are undertaken in a manner which is sensitive to the natural heritage (including landscape character) and/or historic environment of the surrounding area.</p> <p>All new transport schemes should be designed to avoid adverse effect on historic environment features and their setting, and schemes should be appropriate to the character of the townscape or Conservation Area.</p>	<p>Orkney Islands Council</p>	<p>During the course of the Strategy</p>
<p>Use of non-renewable resources (aggregates)</p>	<p>The Roads Department currently transports road planings and other construction waste to Cursiter Quarry from where they are sold as recycled materials. Quarry and road construction resources are being reviewed which will include consideration of internal use of recycled materials in preference to making these available to the wider community.</p>	<p>Orkney Islands Council</p>	<p>Under review 2007-08</p>

Positive effects identified in the Environmental Report

Climatic Factors

The Strategy interventions assessed as positive against Climatic Factors are those which promote methods of travel other than by air, sea or private car. Those sub-strategies with the most significant positive effect are Active Travel, Land Use Planning, Smarter Choices and Bus Services and Community and Voluntary Transport. For the isles, the use of air and/or sea transport is vital in order to maintain connections with the mainland, including for health appointments, business trips and to visit friends and family.

Local Air Quality

The Strategy interventions which are assessed as positive against Local Air Quality are also those which promote methods of travel other than by air, sea or private car. Again, those sub-strategies with the most significant positive effect are Active Travel, Land Use Planning, Smarter Choices etc. and Bus Services and Community Transport.

Biodiversity

Two features of the Strategy promote a greater level of protection to vulnerable species and habitats:

- Development of a policy on the disposal of dredge spoil; and
- Implementation of principles of ‘Best Practical Environmental Option’ when carrying out the construction of new and upgraded roads and, where appropriate, the incorporation of habitat enhancement measures into schemes.

The Strategy also includes measures directed at reducing levels of road traffic which will benefit species which are sensitive to the pollutants present in transport emissions and will also reduce the risk of road kill.

Water & Soil

The Travelling Safely intervention TS1: ‘*Review and update the Winter Maintenance Policy and Plan annually*’ will result in positive impact on water and soil through more efficient application of salt to roads. The use of weather forecasts using thermal mapping and road sensors in Orkney will form the objective basis on which operational decisions will be made.

As part of the Strategy the inclusion of sustainable drainage systems will be considered at the planning stage of any new road development.

Landscape

Positive effect is anticipated from the management of traffic both in Kirkwall and in rural areas and the development of a parking strategy for Orkney. Reduced traffic congestion will lead to improvements to the townscape and at tourist attractions and viewpoints in rural areas.

Cultural Heritage

Positive effect is anticipated from the management of traffic both in Kirkwall and in rural areas, and the development of a parking strategy for Orkney. Reduced traffic congestion will lead to improvements to the townscape and at tourist attractions.

Population

As was indicated in the SEA Environmental Report, many rural areas of the Orkney Islands experience a considerable degree of geographic deprivation, i.e. people without access to a private car / ferry service find that access to services and facilities may be restricted due to the limitations of the passenger transport in their area. This is considered to be a major contributory factor to depopulation of the isles and subsequent migration to the Orkney mainland, particularly the towns, and beyond. The Strategy interventions relating to Ferry and Air Services; Bus Services and Community Transport and Taxi and Private Hire Vehicles all promote improvements to the public transport services, both on the mainland of Orkney and in the smaller Isles.

At another level, people with disabilities may experience difficulties using public transport, e.g. due to mobility problems. Interventions such as TP2: *Consider progress towards an accessible taxi fleet for the County*, and TP3: *Promote the inclusion of Disability Awareness Training as part of the taxi licensing process* will help eliminate barriers to the use of public transport and reduce aspects of social exclusion experienced by people with impaired mobility or other disabilities.

Human Health

A Health Impact Appraisal was carried out on the Local Transport Strategy interventions in order to assess their influence on the promotion of health outcomes. This confirmed that the Strategy interventions relating to Ferry and Air Services will all have positive impact on health through providing improved access to services such as hospital or dental appointments. Improved connectivity with external air services will benefit patients returning to the Isles from hospital appointments on mainland Scotland.

Similarly, the interventions relating to Bus Services and Community and Voluntary Transport and Taxi and Private Hire Vehicles will allow improved geographical access to those who do not have a car available.

Increased uptake of active forms of travel, e.g. walking and cycling, which are promoted by the Active Travel and Smarter Choices sub-strategies, will lead to improved levels of physical exercise and positive impacts on human health. Other health benefits derive from simply being able to access and appreciate the countryside or functional green spaces such as golf courses, parks and municipal gardens. Development of the Core Paths Plan routes and other footpaths will encourage more people to access many of these areas, and take more physical exercise.

The interventions relating to the Travelling Safely sub-strategy promote increased safety on the roads through measures which include the promotion of road user education, encouragement of good road safety practices and a review of speed limits throughout Orkney. The aim is to reduce the number of traffic-related injuries in the County, and to ensure that people feel safe and secure when travelling by all means of travel.

Improved public transport and/or improved travel information may result in increased opportunity for people to gain access to and appreciate the natural and historic environment.

Material Assets

The Roads Department currently transports road planings and other construction waste to Cursiter Quarry, from where these materials are made available to the wider community as secondary aggregate.

To address the SEA objective “to reduce, reuse and recover waste”, quarry and road construction resources are being reviewed which will include consideration of internal use of recycled materials in preference to making these available to the wider community.

**Post-Adoption SEA Statement
How opinions expressed during the consultation have been taken into account**

Opinions expressed by the Consultation Authorities during the consultation and how they have been taken into account are included as appendices at the end of this document. Appendix I contains comments relating to the SEA Environmental Report and Appendix II contains those relating to the Orkney Islands Local Transport Strategy.

**POST-ADOPTION SEA STATEMENT
REASONS FOR CHOOSING THE ORKNEY ISLANDS LOCAL
TRANSPORT STRATEGY AS ADOPTED, IN THE LIGHT OF
OTHER REASONABLE ALTERNATIVES**

Three alternative Strategy scenarios were considered for the Orkney Islands Local Transport Strategy and these are presented in **Table 2** below:

Table 2: Alternatives to the Orkney Islands Local Transport Strategy

Alternative	Implications for the Local Transport Strategy
Do minimum scenario	Assessment of the current plan without revision. The transport system would increasingly become inefficient and ineffective.
Unrestrained service development including a substantial increase in air and ferry services and demand-led provision of road space	The Strategy would contain significant additional air and sea routes and significant road / car park building to meet the demand and desires for additional capacity
Improved efficiency and effectiveness of transport and the transportation system	Assessment of the environmental impacts against the objectives set out in this Local Transport Strategy and consideration of the best combined way to mitigate against adverse impacts while delivering positive community outcomes.

Alternative 1 is the lowest cost and most easily deliverable strategy, and mitigation would not be required of the impacts of the current transport and transportation network and system. However, over time, the system would become increasingly inefficient and ineffective. Without improvements to the transport service it is probable that depopulation of the Isles, already a problem, would continue and increase.

Alternative 2 would have the greatest impact upon social and economic outcomes as connectivity would be maximised between the Isles and the Orkney mainland, between the Scottish mainland and internally between our towns and villages. However unrestrained service development is the least sustainable option and would also have the greatest negative impact on environmental outcomes. Substantial increases in air and ferry services would result in negative impacts on climate effects and local air quality through increases in atmospheric emissions. Demand-led provision of road space would lead to negative impacts upon water, soil and geology, and would result in loss and fragmentation of habitats and subsequent loss of biodiversity. Road construction and increased traffic levels would also result in negative impact on the landscape and increased use of material assets such as aggregates from quarries. Furthermore, this option includes no encouragement towards increased uptake of active travel and the health benefits which it brings.

Alternative 3 would have a significant impact upon social and economic outcomes and offers the most efficient use of the available funding. The planned improvements to the efficiency and effectiveness of Orkney's transport and transportation system will add to the environmental sustainability of the service as a whole.

Of the nine key Priorities for Action in Orkney Islands Council's Corporate Strategic Plan the two priorities with specific relevance to the Local Transport Strategy are:

- Pursue the development of an integrated transport infrastructure which is economically, socially and environmentally sustainable.
- Progress modernisation of services in pursuit of continuous improvement in efficiency and best practice.

Alternative 3 accords with both of these priorities as it will result in a Strategy which will improve the efficiency of the existing transport service whilst also facilitating a modal change to more sustainable means of travel. Alternative 3 is the preferred Strategy approach.

The Orkney Islands Local Transport Strategy 2007 -2010

The Orkney Islands Local Transport Strategy 2007 to 2010 follows on from, and builds upon, the previous Orkney Islands Local Transport Strategy which covered the period 2001 to 2004. Its development has been steered by the overall vision of the Orkney Islands Council and fits with the Scottish Executive's five key transport objectives and those of other national, regional and local policies and strategies. Its six key delivery objectives are to:

1. Ensure travel opportunities meet the needs of the whole community;
2. Integrate various means of travel around Orkney;
3. Promote accessibility for all;

4. Increase levels of active travel;
5. Make travel safer;
6. Reduce traffic in sensitive areas.

The overarching aim of these objectives is to enhance the present transport service, making it safer, more efficient and more accessible, and to encourage and enable the uptake of more sustainable forms of transport such as walking and cycling. No major increase in service provision is anticipated during the period of the Strategy.

POST-ADOPTION SEA STATEMENT
Measures that are to be taken to monitor significant environmental effects of the implementation of the Orkney Islands Local Transport Strategy

The measures that are to be taken to monitor significant environmental effects of the implementation of the Orkney Islands Local Transport Strategy are set out in **Table 3** below.

Table 3: Monitoring framework

What is being monitored	Data source, frequency of monitoring	Summary of proposed remedial action by OIC (if information is available)	Timescale and responsibility
Climate effects	Annual fuel consumption of: <ul style="list-style-type: none"> • Orkney Coaches • Orkney Ferries • Orkney’s internal air service 	Methods of reducing fuel consumption are being researched	Annual OIC
Climate effects	Weather-related disruption to travel, e.g. flooding and flight cancellation		Annual OIC
Local air quality	Annual Local Air Quality Management Progress Reports	Air quality limits for transport emissions are unlikely to be exceeded but will continue to be monitored	Annual OIC
Biodiversity	Reported damage to protected sites (SAC, SPA, SSSI) caused by transport-related activities	Information regarding protected sites in Orkney will be distributed to transport operators and relevant OIC departments	Annual SNH
Biodiversity	Number of successful licence applications for derogations of the Habitats Directive to disturb European Protected Species		Annual SNH and SEERAD

What is being monitored	Data source, frequency of monitoring	Summary of proposed remedial action by OIC (if information is available)	Timescale and responsibility
Biodiversity	Achievement of LBAP targets (LBAP currently under development)		Annual OIC
Water	Water pollution events related to transport (Baseline data specific to transport not currently available)		Annual SEPA
Water	Percentage of new road length incorporating SUDS features		Annual OIC
Water	Number of flooding events to affect transport infrastructure		Annual OIC
Soil	No monitoring at present		
Landscape	Proportion of transport projects accompanied by outline landscape design (baseline data not currently available)		Annual OIC
Cultural heritage	Number of applications for Scheduled Monument Consent, related to transport		Annual Historic Scotland
Cultural heritage	Number of applications for Listed Building Consent (inc. demolitions), related to transport		Annual Historic Scotland
Human Health	Road accident statistics	Implement intervention TS2 of the Travelling Safely sub-strategy	Annual OIC
Human Health	Physical activity – travel to work/study mode	Carry out an annual survey of travel to work/study	Annual OIC
Human Health	Numbers of passengers travelling to World Heritage Site by public transport - access to Historic sites	If demand exists, service may be increased	Annual OIC
Population	Population statistics from General Register Office for Scotland		Annual OIC
Material assets	Road planings and construction waste re-used	Under review	Annual OIC
Material assets	Road planings and construction waste made available for re-sale	Under review	Annual OIC
Material assets	Road sweepings sent to Chinglebraes and Bossack for decontamination and landfill		Annual OIC

POST-ADOPTION SEA STATEMENT

This Post-Adoption Statement summarises the findings of the Strategic Environmental Assessment of the Orkney Islands Local Transport Strategy 2007-2010. It describes the environmental impacts, both negative and positive, identified through the assessment process as outcomes which could result from implementation of the Strategy interventions, and it sets out the measures which have been identified for the prevention, reduction and off-setting of any negative effects. A framework is also presented of the measures that will be taken to monitor significant environmental effects of the implementation of the Strategy

Strategic Environmental Assessment of the LTS and the subsequent consultation process have led to the identification of areas where the development of stronger environmental protection policies may be beneficial. These are summarised briefly below:

- The LTS promotes consideration of the inclusion of sustainable drainage systems at the planning stage of any new development.
- The LTS promotes the development of a policy on the dumping at sea of dredge spoil, such that dredge spoil should be disposed of in areas where it will not impact negatively upon vulnerable marine habitats or the activities of other users of the sea.
- In the construction of new and upgraded roads the LTS promotes the use of principles of 'Best Practical Environmental Option' to ensure that, where possible, environmental enhancement is included in schemes, rather than simply mitigation and reduction of adverse effects. It also recognises the need for a clear policy on roads maintenance which should acknowledge the potential for impacts on the environment, e.g. coastal protection, but also the potential for environmental enhancement.
- As part of the Strategy, a tailored policy for timing the mowing of roadside verges to allow certain plants to flower has been developed. It is proposed that all main A Class roadside verges will be cut three times per year and all other roads, with the exception of conservation verges, will be cut twice per year.
- In line with the waste management principle of 'reduce, reuse and recycle', quarry and road construction resources are being reviewed which will include consideration of internal use of recycled materials in preference to making these available to the wider community.

Any new policies or changes to existing policies which result from the LTS will be incorporated into the updated version of the Orkney Local Plan, production of which is about to begin.

Long Term Transport Proposals

In the longer term, in order to comply with improved standards for accessibility and safety, new vessels will be required to replace the present Orkney Ferries fleet. The design of these vessels will necessitate carrying out modifications to or, in some cases, the potential relocation of terminals on the isles. Planning for these works is still at an early stage and the extent of both vessel replacement and terminal alterations will also depend on the

availability of funding. The long-term shape of Orkney's future transport service and infrastructure therefore is not yet certain.

However, we are now aware that although the replacement vessels will not enter service until beyond the lifetime of this strategy, the earliest date by which alteration work may commence on one or more terminals/vessels could be during the latter stages of the Strategy period. Each individual terminal development project will be subject to Environmental Impact Assessment, and the entire programme will also be subject to Strategic Environmental Assessment.

Post-Adoption SEA Statement
How opinions expressed during the consultation have been taken into account

APPENDIX I Responses of the Consultation Authorities to the Environmental Report

Comments made by SEPA relating to the SEA Environmental Report	
Comment	How the comment was taken into account in making the decision to adopt the final PPS
Numbering used in contents page is not reflected in the rest of the document.	This has been corrected.
In future the Responsible Authority may wish to include the most up to date OIC Air Quality Progress Report and any other info on local air quality.	The data included in the Environmental Baseline was the most up-to-date which was available at that time. For future monitoring purposes we shall continue to obtain annual data from the OIC Environmental Health Department.
Detrimental impact on localized air quality was identified as a problem but was not identified in the SEA environmental baseline.	At certain times of the day, a degree of congestion is experienced in Kirkwall and Stromness and it was subsequently thought that this might impact negatively on the air quality of localized areas in these towns. However the sampling equipment used for air quality monitoring in both towns is located in areas where congestion is highest and the resulting NO ₂ data, which is included in the Environmental Baseline, indicated that at no time was the Air Quality Objective for NO ₂ exceeded.
The key in Table 8 refers to significant effects but the key for Table 9 and Appendix C does not specify the significance of the effect.	The Environmental Report has been amended to include a more comprehensive explanation of the assessment method.
SEPA assumes that the assessment was made against the SEA objectives and the “assessment criteria” is a shortening of these.	Yes the assessment was made against the SEA objectives.
FPH1 and FPH2 may result in negative effects against the climate change SEA objectives; however SEPA accepts these may not be significant.	These two interventions may encourage more people to travel by ferry, thereby increasing the load on the ferries and causing their fuel use to increase. We do not consider this impact to be significant. However, the annual fuel consumption of Orkney Ferries will be included in the Monitoring Programme.
Increased shipping from port development (FPH4) may result in impacts on local air quality.	The most likely increase in shipping will be one extra weekly sailing to North Ronaldsay which may be fitted into the sailing which presently goes to Papa Westray. It is not considered that the effects on local air quality will be significant.

Comments made by SEPA relating to the SEA Environmental Report	
Comment	How the comment was taken into account in making the decision to adopt the final PPS
Impacts from freight transport (F1 to F3) are generally unknown. This may suggest you wish to reconsider rewording these interventions to reduce the possibilities of negative effects.	As any increase in freight transport to the Islands is constrained by current ferry provision, no increase in the freight transport service is anticipated. These interventions are directed at more efficient use of the present network, better communication with representatives of the freight transport industry and improved livestock shipment. Appendix C has been amended to include the re-assessment of this sub-strategy.
A comments column in Tables 9 and 11 would have been useful	A text summary of the results of the assessments has been included in the Environmental Report.
SEPA requests that fuller details of mitigation measures to prevent reduce and offset negative environmental effects on climatic factors, local air quality, water & soils and material assets. Please include in Post Adoption SEA.	The table of mitigative measures has been amended both in the Post Adoption Statement and in the Environmental Report.
It would be useful if the Post Adoption SEA made clear whether the assessment has had any impact on the draft strategy.	This information is included in the Post Adoption Statement and as an appendix to the Strategy.
Table 12 could have made clearer exactly for which aspects of the Strategy mitigation is required and who will be required to implement it. For example most of the Strategy components were assessed to be significantly negative against 'material assets'	The table of mitigative measures has been amended both in the Post Adoption Statement and the Environmental Report.
The Responsible Authority should consider exactly which aspects of the water and soil environment the Strategy is likely to impact upon.	This is addressed in the Post Adoption Statement

Comments made by SNH relating to the SEA Environmental Report	
Comment	How the comment was taken into account in making the decision to adopt the final PPS
It would have been useful if one of the objectives had made reference to geology and geo-diversity.	A brief overview of the geology of the Orkney Islands has been added to the Environmental Baseline document but as it is not anticipated that implementation of the LTS will impact upon Orkney's geology it has not been considered further.

Comments made by SNH relating to the SEA Environmental Report	
Comment	How the comment was taken into account in making the decision to adopt the final PPS
Objective 3: Biodiversity – this could contain an inherent tension in that access to biodiversity may conflict with protecting it. Perhaps access to natural heritage should come under human health.	Appendix C (Assessment of all strategy interventions) has been amended to take into account this comment.
Human Health – could make reference to access to functional green-space/ countryside, core path network etc.	Reference to these aspects has been included in the Post Adoption Statement.
SNH welcomes the presentation of alternatives. It would have been helpful if alternatives at other levels were also considered, e.g. different objectives to meet the preferred strategy or different options to meet the objectives.	Although alternative objectives were not included in the Strategy when it went out to consultation, the SEA and consultation process have resulted in the inclusion of two additional strategy interventions. These are: LRM3: sustain and improve connections in the locally significant network TS3: review speed limits throughout Orkney by 2011 and introduce appropriate measures
This provides a comprehensive coverage of related PPS and environmental protection objectives. However, under NPPG13 Coastal Planning, SNH considers that reference should also be made here to Coastal Zone Management and/or Shoreline Management Plans and the need to consider the implications for dealing with coastal erosion both when planning any new transport developments but also when maintaining the existing road infrastructure.	Appendix A, Other Plans, Projects and Strategies which are relevant to the Orkney Islands Local Transport Strategy, has been amended to take account of this comment.
SNH considers that this Report provides a good description and interpretation of the current state of the environment. There are however three points that need amending relating to the list of Special Areas of Conservation (SAC) and Special Protection Areas (SPA) in Orkney. <ul style="list-style-type: none"> • SAC – the fifth site listed should be ‘Loch of Isbister’ not Loch of Isbister and The Loons 	The Environmental Baseline has been amended to take account of this comment.

Comments made by SNH relating to the SEA Environmental Report	
Comment	How the comment was taken into account in making the decision to adopt the final PPS
<p>(this is the SSSI name only).</p> <ul style="list-style-type: none"> • SPA – Sule Skerry and Sule Stack is one SPA. • SPA - the Marwick Head site has been omitted from the list. 	
SNH welcomes the inclusion of Table 4 clearly setting out the data sources used.	
<p>It is slightly unclear how the conclusions have been drawn. In Table 11 on cumulative effects, impacts on biodiversity are summarised as overall positive. However, the detailed assessment includes a range of positive and negative effects on biodiversity, including some negative effects from loss of species and habitats. It suggests that these negative effects are outweighed by positive effects of modal shift and reduced congestion. Perhaps at best the effect should be summarised as neutral, or better still as +/-.</p>	<p>Appendix C (Assessment of strategy interventions) has been reviewed to take account of this comment and to include assessment of the additional strategy interventions.</p> <p>Table 11 of the Environmental Report has also been amended to take account of this comment.</p>
<p>Given the report's conclusion that increases in ferries are likely to have a significant effect on Natura sites, it is not clear again why the summary in table 11 records a neutral effect. This should clearly be a negative effect. The conclusion of adverse effects on the integrity of the sites can only be ascertained through an appropriate assessment and cannot be concluded here. Therefore, it would be better if this section concluded likely significant effect and referred to the appropriate assessment.</p>	<p>Please refer to legend for Table 11.</p> <p>Appropriate Assessment has been undertaken of Strategy Intervention FPH3: improve accessibility and connectivity to / from the mainland.</p>
<p>It is a little surprising that air services come out so benign and we would query whether effects on climate change and noise (which could be biodiversity disturbance, perception of landscape or human health/well-being) should be raised. We appreciate that the</p>	<p>Please refer to legend for Table 11.</p>

Comments made by SNH relating to the SEA Environmental Report	
Comment	How the comment was taken into account in making the decision to adopt the final PPS
policy will probably be justified on population/ human health grounds, as well as economy and social inclusion, but need to ensure that all the environmental impacts have been picked up.	
Buses - no comment	
Taxis - No comment	
<p>Local Roads and road maintenance</p> <p>The assessment of the two current policies is satisfactory. However, it does seem to highlight a possible gap in the Strategy in that there is currently no policy relating to the actual maintenance regime once the information on the state of the roads is gathered. SNH recommends that an additional policy is required covering actual roads maintenance which would need to be assessed through an SEA (e.g. potential for impacts on designated sites/ coasts, access and recreation etc. as well potential for positive effects if alien species removed, landscape improvements achieved, footpaths maintained etc.)</p>	<p>The additional intervention which has been included in this sub-strategy addresses the road maintenance regime. It is:</p> <p>LRM3: sustain and improve connections in the locally significant network</p> <p>However SEA of any roads maintenance strategy will be the responsibility of the Roads Department.</p>
Travelling safely - No comment	
Parking - No comment	

Comments made by SNH relating to the SEA Environmental Report	
Comment	How the comment was taken into account in making the decision to adopt the final PPS
<p>Freight It is noted that the impacts from freight transport are generally unknown however if freight is increased, even with efficiencies there is likely to be a significant effect on biodiversity, water or landscape. Suggest you have to assume that there will be an effect and then seek mitigation through improved efficiencies.</p>	<p>As any increase in freight transport to the Islands is constrained by current ferry provision, no increase in the level of freight transport service is anticipated. Interventions F1, F2 and F3 are directed at more efficient use of the present network, better communication with representatives of the freight transport industry and improved livestock shipment.</p>
<p>Land-use planning – no comment</p>	
<p>Table 9 - Assessment of Objectives Welcome presentation of this assessment.</p> <p>Accessibility for all scores well against biodiversity, presumably because the biodiversity objective includes reference to access to biodiversity. Significant increases in access to sensitive biodiversity could have adverse effects and require management, e.g. through new or upgraded footpaths. SNH welcomes and seeks to promote access to the natural heritage, but it might be clearer that there can be tensions between the twin aims of protecting and accessing biodiversity if these elements were contained in separate objectives.</p>	<p>Table 9 has been reviewed to take account of this comment, with access to natural heritage coming under the Human Health SEA issue.</p>
<p>Table 11 - Cumulative effects It is useful to see this table and we have recorded some concerns above with the way the effects have been summarised.</p> <p>It is also useful to look down this table as well as across. This clearly highlights that there are problems with proposal 2 – ferries, in that this scores the most number</p>	<p>Please refer to legend for Table 11.</p> <p>Sub-strategy 2 is Air Services and, as might be expected, scores the most number of negatives.</p> <p>The justification for maintaining this level of air service to and within the islands is included in the Post Adoption Statement.</p>

Comments made by SNH relating to the SEA Environmental Report	
Comment	How the comment was taken into account in making the decision to adopt the final PPS
of negatives. Do the positive effects on population and human health outweigh these other effects, and if so the justification for keeping such a policy in the strategy should probably be included.	
Mitigation The mitigation for Natura under biodiversity is insufficient. However, we understand that OIC are currently carrying out an appropriate assessment. The assessment will either conclude that no mitigation is needed or identify what that mitigation would be.	Appropriate Assessment has been carried out for the Ferry Services, Ports and Harbours intervention FPH3 : improve accessibility and connectivity to / from the mainland.
Monitoring It would be useful here to have a summary of significant effects identified and monitoring relevant to these. This could be followed by any other relevant monitoring designed to pick up unexpected effects, e.g. on water or landscape.	A table including a more comprehensive list of monitoring proposals is included in the Post Adoption Statement.

Comments made by Historic Scotland relating to the SEA Environmental Report	
Comment	How the comment was taken into account in making the decision to adopt the final PPS
Outline and objectives of the Orkney Islands LTS 1. Section 2 provides helpful background information and a clear overview of the LTS.	
Relationship with other PPS and environmental objectives 2. I am content with the plans, programmes, strategies and policies that have been reviewed in Appendix A and the key messages set out on pages 12 and 13.	

Comments made by Historic Scotland relating to the SEA Environmental Report	
Comment	How the comment was taken into account in making the decision to adopt the final PPS
<p>Relevant aspects of the current state of the environment</p> <p>3. In Appendix B “historic gardens and designed landscapes” should be referred to as “gardens and designed landscapes”.</p>	The Environmental Baseline has been amended to take account of this comment.
<p>4. The data provided for some of the historic environment features in the Orkney Islands is from September 2000. For information, our records show that there are currently:</p> <ul style="list-style-type: none"> • 365 scheduled ancient monuments • 642 listed buildings • 3 gardens and designed landscapes (Skaill House is not included in the list in section 5 of Appendix B) 	The Environmental Baseline has been amended to take account of this comment.
<p>5. In addition to areas designated for their natural heritage importance, Figure 1 also shows areas designated for their cultural heritage value i.e. the World Heritage Site and conservation areas.</p>	Figure 1 has been amended to take account of this comment.
<p>Environmental problems</p> <p>6. Table 3 identifies potential environmental problems and notes that “construction of new infrastructure can result in damage to, or loss of, natural heritage, including the marine environment”. It should also identify that such construction can also result in the loss of, or damage to, historic environment features or may affect their setting.</p>	The Environmental Report has been amended to take account of this comment.
<p>Likely future of the area without the Strategy</p> <p>7. I have no comments on this section</p>	
<p>SEA objectives</p> <p>8. I note that the SEA objective for the historic</p>	Appendix C (Assessment of all strategy interventions) has been amended to take into account this comment.

Comments made by Historic Scotland relating to the SEA Environmental Report	
Comment	How the comment was taken into account in making the decision to adopt the final PPS
environment has two aspects, one relating to the protection of the historic environment and the other relating to improving opportunities for people to access and appreciate the historic environment. It would have been clearer to separate these two parts of the SEA objective during the environmental assessment as there may be conflict between increasing access to sensitive historic environment sites and their protection, e.g. historic environment features may experience erosion or compaction from increased visitor numbers.	
<p>Alternatives considered</p> <p>9. I note that three high level alternatives to the LTS are assessed. It would have been useful to describe whether there were alternatives considered for delivering the LTS during its preparation, e.g. different interventions to meet the objectives of the LTS.</p>	<p>Although alternative objectives were not included in the Strategy when it went out to consultation, the SEA and consultation process have resulted in the addition of two additional strategy interventions. These are:</p> <p>LRM3: sustain and improve connections in the locally significant network</p> <p>TS3: review speed limits throughout Orkney by 2011 and introduce appropriate measures</p>
<p>Assessment methods</p> <p>10. I am content with the methods used in the assessment and I have assumed that when considering effects on the historic environment both direct and indirect impacts on historic environment features have been considered. The inclusion of a commentary in the assessment tables is welcomed.</p>	
<p>Assessment of the Orkney Islands LTS</p> <p>11. Active travel AT1 and AT5. The construction and maintenance of cycle ways and foot paths may have a negative effect on the historic environment depending upon their location and works involved, e.g. new tracks may damage archaeological remains. I suggest that the impact on the historic environment should be assessed as uncertain.</p>	<p>Appendix C (Assessment of all strategy interventions) has been amended to take into account this comment.</p>

Comments made by Historic Scotland relating to the SEA Environmental Report	
Comment	How the comment was taken into account in making the decision to adopt the final PPS
Ferries FPH3 – There may be adverse effects on the historic environment if new infrastructure is required in order to deliver this measure. I suggest that the impact on the historic environment should be assessed as uncertain.	Appendix C (Assessment of all strategy interventions) has been amended to take into account this comment.
Air, buses – a number of the measures relating to improved access are assessed as having positive effects on the historic environment due to improving opportunities for people to visit and appreciate historic environment sites. It should also recognise that this may cause additional pressure on the resource which in some cases may have adverse effects and require to be managed. The impact on the historic environment would be better assessed as +/- or uncertain.	Appendix C (Assessment of all strategy interventions) has been amended to take into account this comment.
Travelling safely – TS2 – engineering solutions to improve safety may also have adverse effects on the historic environment depending upon the location and detail of the works required. The impact on the historic environment should be assessed as uncertain. Traffic and parking TP1 and TP3 – I agree that reduced traffic in town centres may have a positive effect on the historic environment. However some traffic management measures may also have adverse effects on the historic environment, e.g. inappropriate street signage, traffic calming measures or traffic clutter. The impact on the historic environment should be assessed as uncertain or +/-.	Appendix C (Assessment of all strategy interventions) has been amended to take into account this comment.
Freight F1 – there may be adverse effects on the historic environment if new or improved infrastructure is required in order to deliver the measure. I suggest that the impact on the historic environment should be	Construction of new infrastructure is not anticipated in order to deliver this measure therefore it is considered that there will be no negative impact on cultural heritage as a result of implementation of the Freight sub-strategy.

Comments made by Historic Scotland relating to the SEA Environmental Report	
Comment	How the comment was taken into account in making the decision to adopt the final PPS
assessed as uncertain.	
<p>Assessment of the LTS – cumulative effects 12. Table 11 sets out an assessment of the individual strategy interventions and their cumulative effects. In light of the comments provided above I consider that some of the interventions will have uncertain effects on the historic environment rather than the neutral or positive scores given in Table 11. Cumulative effects on the historic environment are difficult to predict but may arise from the provision of smaller scale infrastructure such as lighting, street furniture, traffic calming measures or signage as well as from new or improved larger scale infrastructure.</p>	Table 11 has been amended to take account of assessment of the additional strategy interventions and also the comments of the Consultation Authorities.
<p>Measures envisaged from the prevention, reduction and offsetting of any significant adverse effects 13. Table 12 sets out measures to mitigate the significant environmental effects of the LTS and I note that there are no measures suggested to mitigate potential impacts on the historic environment. I consider that mitigation measures for the historic environment should be developed as some of the LTS interventions have the potential to adversely affect the historic environment depending upon how they are implemented. I suggest including a commitment in the SEA Adoption Statement that all new transport schemes should be designed to avoid adverse effect on historic environment features and their setting, and schemes should be appropriate to the character of the townscape or Conservation Area.</p>	Table 12 has been updated to take account of this comment.
14. It is not clear from the report how the mitigation measures will be implemented as the LTS is delivered,	This information is included in Table 1 of the Post Adoption Strategy and the revised Table 12 of the Environmental Report.

Comments made by Historic Scotland relating to the SEA Environmental Report	
Comment	How the comment was taken into account in making the decision to adopt the final PPS
and who will be responsible for ensuring that this is undertaken. It would be helpful to clearly set out a commitment to ensuring that mitigation measures are delivered in the SEA Adoption Statement.	
15. Mitigation can also involve making changes to the plan as a result of the environmental assessment, for example by including stronger environmental protection policies. However it is not clear in the Environmental Report whether or not this was considered although I note that the LTS does include a discussion of the SEA process.	The LTS will include an Appendix identifying areas where SEA has identified that stronger environmental policies are necessary. These policies will be introduced in the Orkney Islands Council Local Plan which is about to be updated and re-written.
Monitoring 16. Table 13 sets out the proposed indicators for monitoring the environmental effects of the LTS. I note that for the historic environment “planning applications will be consulted”. I suggest that you may wish to rephrase this slightly to make clearer links with the effects of the LTS. You may also wish to monitor the number and outcome of applications for listed building consent or scheduled monument consent that are related to transport projects.	These points have been included in Table 13.
Next steps 17. I have no comments to offer on this section.	

APPENDIX II Responses of the Consultation Authorities to the Orkney Islands Local Transport Strategy

Comments made by SEPA relating to the Orkney Islands Local Transport Strategy	
Comment	How the comment was taken into account in making the decision to adopt the final PPS
The time period for the Strategy seems very short given that transport infrastructure and replacement vessels can need long lead in times.	This is the timescale recommended in the guidance notes for producing a Local Transport Strategy.
The Environmental Baseline should include a report or collation of existing transport types.	A description of the existing transport types and level of service is included in the Environmental Baseline document.
Although there are references to off island connections the thrust of the report seems to focus on internal transport issues.	As a local transport strategy, its main focus is on internal transport issues.
Except in the context of CO ₂ emissions there is no discussion of fuel types, quantities, sustainable use, development of alternatives or impact of fuel storage and sale.	Orkney Ferries use approximately 2.8 million litres of marine gas oil per annum. Orkney Coaches used 120,000 litres of diesel in 2004. The inter-island air service used 140,000 litres of aviation fuel in 2004. The above information is included in the Environmental Baseline document. In these instances, fuel storage is the responsibility of the transport operator. Sustainable use, i.e. efficiency and development of alternative fuel types have been considered in the mitigative measures section of this Post Adoption Statement.
There is nothing about staggered journey times and walk to school initiatives as part of social aspects of LTS	The journey times for Primary and Secondary schools in Kirkwall and Stromness are already staggered. School initiatives are included in the Strategy and are addressed by the Active Travel strategy interventions AT3 and AT4 which can be found on pages 17 and 18.
Nothing about abandoning grass cutting on verges, only changing seasonal timings	This is addressed in Table 1 Mitigative Measures, above.
Is there evidence for significant unrestrained future demand (c.f. extrapolated population decrease)?	The population of Orkney is estimated to have fallen by just over one per cent between 1995 and 2005, largely due the death rate exceeding the birth rate. However, due to a net migration into the county, since 2001 the population has been growing. Furthermore, the trend in Orkney is towards an ageing population which can mean greater demands are placed upon services and in turn the transport services network. The needs of the business sector and a general increase in desire to travel also add to the demand for increasing provision of transport services.
Fuel efficiency of aircraft against runway length	At a regional / national level investigatory work is being undertaken looking at single-engine aircraft

Comments made by SEPA relating to the Orkney Islands Local Transport Strategy

Comment	How the comment was taken into account in making the decision to adopt the final PPS
and accessibility might usefully be referred to?	in situations such as exist in Orkney. At present such aircraft are not operable under Civil Aviation Authority regulations.
It may be useful to expand upon the section “A special geography” To cover the wider environment, e.g. Orkney’s pristine environment.	References to the environment of Orkney are included at various points in the Strategy and it was felt this was covered by the SEA which developed in parallel with the Strategy.
SEPA would like to see action(s) included to address impact on air quality in Stromness due to transport.	A number of the sub-strategies, e.g. Active Travel, Bus Services and Community & Voluntary Transport and Smarter Choices, include interventions which will encourage a reduction in use of the private car through increasing the attractiveness of walking, cycling and using public transport and by the preparation of Travel Plans. Both Kirkwall and Stromness will also benefit from implementation of Traffic and Parking intervention TP3, <i>Review and develop a parking strategy for Orkney.</i>
SEPA is pleased to note and is supportive of the sustainability aspect of the Strategy’s planning objective.	
SEPA notes and welcomes the strong commitment to Active Travel as part of the suite of interventions proposed in the Strategy.	
SEPA also welcomes the commitment to invest in cleaner and more innovative buses. This intervention could be enhanced by including a commitment to regular maintenance of existing stock as older vehicles do tend to be more polluting if not maintained regularly.	Orkney Coaches are obliged by law to ensure that checks are made regularly of items which affect roadworthiness. We would support or monitor this if necessary. There is a general commitment on the part of OIC and Orkney Coaches to reduce the average age of the fleet by introducing new vehicles and decommissioning the oldest, most polluting vehicles. HITRANS has assisted with channelling investment from the Scottish Executive and Orkney is about to take receipt of two new low floor coaches this summer.
Similarly it is also good to see that the potential environmental impacts of port development are identified	
Also in relation to active travel SEPA notes the strong commitment in the land use planning section that access of pedestrians and cyclists (and people with mobility difficulties) will be a priority in the design of new developments. SEPA looks forward to seeing this being realised	

Comments made by SEPA relating to the Orkney Islands Local Transport Strategy

Comment	How the comment was taken into account in making the decision to adopt the final PPS
in the planning applications it will be consulted upon	
In relation to local roads and maintenance SEPA takes this opportunity to remind the Council that any engineering works which could impact upon the water environment will require to be authorised under the Water Environment (Controlled Activities) (Scotland) Regulations 2005 (CAR).	This requirement is acknowledged in the SEA Post-adoption Statement.
SEPA notes the commitment for the Council to prepare and implement its own Travel Action Plan. The potential impact of Council vehicles could also be decreased by a commitment in the Strategy that any new vehicles bought by the Council be dual-fuel. You may find other ideas for organisational change from the “Greening your workplace” section of SEPA’s website at: http://www.sepa.org.uk/green/guidance.htm	OIC Technical Services vehicles are all Euro 4 compliant. Unfortunately Orkney is not yet dual-fuel enabled. However this point has been included in the recent OIC Carbon Management Plan.

Comments made by SNH relating to the Orkney Islands Local Transport Strategy

Comment	How the comment was taken into account in making the decision to adopt the final PPS
Chapter 2: Policies and Objectives could include reference to the Local Plan (reference is made later in the document).	The Local Plan and its aims, which include protection of the environment, have been taken account of during development of the Strategy. (Reference in made of the Local Plan on page 30). Development has recently commenced on an update of the Local Plan.
Chapter 3: Suggest that mention of the Land Reform Act is made within this chapter and the growth in interest in access and recreation.	Environmental factors are included throughout the strategy and are covered in more detail by the SEA Environmental Report. The Land Reform Act is mentioned under Active Travel AT5 which concerns the Core Paths Network.

Comments made by SNH relating to the Orkney Islands Local Transport Strategy

Comment	How the comment was taken into account in making the decision to adopt the final PPS
Would also suggest that basic information about the environment is included in this chapter – especially the key factors that can be affected by transport, e.g. water quality, landscape character and visual amenity, bio- and geo-diversity.	
Chapter 4: SNH welcomes the overarching vision and particularly the reference to sustainability and the <i>planning objective</i> . It is less obvious how the <i>delivery objectives</i> relate to either the <i>planning objective</i> or the <i>actions</i> . Suggest that it would be beneficial to see an objective to do with environment or natural heritage and to meeting Scotland’s carbon emissions target.	This is not something that we can specifically deliver, unlike the others. These are important nonetheless and hence the inclusion in the over-arching vision and its discussion in Section 3.
Chapter 5: Active Travel – welcome proposals for walking and cycling. It might be useful to include reference to the Land Reform Act under the preamble, rather than only at AT5. AT5 could also acknowledge other access rights, e.g. horse riding and canoeing.	
Air travel – SNH accepts the need for internal and external flights in Orkney, which underpin the social and economic fabric here. Whilst SNH is keen to see an overall reduction in the contribution of Scottish flights to carbon emissions, SNH recognises that a reduction in air travel may not be appropriate for Orkney at this time.	
Bus and Community Transport – could suggest an action to promote/facilitate access to natural, historical and cultural sites by bus.	This is now stated as part of BC1. If the demand were to arise we would consider further bus services, e.g. to enable people to access natural heritage sites.
Ferry services, port and harbours – FPH5,	FP5 relates to port development which is being considered by the Harbours Department.

Comments made by SNH relating to the Orkney Islands Local Transport Strategy

Comment	How the comment was taken into account in making the decision to adopt the final PPS
suggest that SNH would welcome the opportunity to the development of this policy. Note that it is likely that this policy will require SEA and possibly Appropriate Assessment when it is developed, both at strategic and specific policy levels.	However Orkney Islands Council will welcome the opportunity to receive input on future replacement of the inter isles ferries and the associated alterations to piers.
Freight – F1-3 no comment.	
Land Use Planning and Development Control – support LUP 1-3	
Local roads and maintenance – this includes an inventory and inspections of road network. However, SNH suggests that there should also be a clear policy for roads maintenance which should acknowledge the potential for impacts on the environment, e.g. coastal protection, but also the potential for enhancement, e.g. through sympathetic management of roads corridors for wildlife.	<p>A third strategy intervention, LRM3: sustain and improve connections in the locally significant network, has been included under the Local roads and road maintenance sub-strategy.</p> <p>The LTS is supportive of the development of a clear policy for roads maintenance, acknowledging the potential for impacts on the environment, but also the potential for enhancement. The Local Plan is about to be reviewed and updated and this may well be where such a policy would be included.</p>
Smarter choices and travel information strategy – no comments.	
Taxis etc. – no comments.	
Travelling safely – note that this seems to focus on travel safety. SNH could seek stronger links with the active travel policies and acknowledgement that travel safety affects all road users, including cyclists and pedestrians – perhaps there is a need for travel safety policies for non-motorised transport, e.g. safer road crossings, improved footpaths etc.	This is now referred to specifically, with the addition of a further Travelling Safely strategy intervention TS3: review speed limits throughout Orkney by 2011 and introduce appropriate measures. Pedestrian crossing and improved footpaths are also covered in Active Travel under AT1: to improve, extend and maintain the walking and cycling network.

No comments on the Local Transport Strategy were received from Historic Scotland.

