

**POST-ADOPTION SEA STATEMENT – COVER NOTE**

**PART 1**

**To:** [SEA.gateway@scotland.gsi.gov.uk](mailto: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:**

**The Orkney Local Biodiversity Action Plan 2008-2011**

**The Responsible Authority is:**

**Orkney Islands Council**

**PART 3**

<b>Contact name</b>	Eileen Summers
<b>Job Title</b>	Policy Officer (Environment)
<b>Contact address</b>	Policy & Projects Department of Development Services Orkney Islands Council School Place Kirkwall Orkney KW15 1NY
<b>Contact tel. no</b>	01856 873535
<b>Contact email</b>	eileen.summers@orkney.gov.uk
<b>Signature &amp; date</b>	Eileen Summers      31 July 2008

## POST - ADOPTION SEA STATEMENT

### Post-adoption SEA statement for:

**The Orkney Local Biodiversity Action Plan 2008-2011**

### Adopted on:

**31 July 2008**

### 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](http://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**

**Customer Services  
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**

<b>Name of Responsible Authority</b>	Orkney Islands Council
<b>Title of PPS</b>	<b>The Orkney Local Biodiversity Action Plan 2008-2011</b>
<b>Purpose of PPS</b>	To guide the conservation and enhancement of key features of biodiversity in Orkney.
<b>What prompted the PPS</b> (e.g. a legislative, regulatory or administrative provision)	The Orkney LBAP 2002 was prompted by the Convention on Biological Diversity 1992. This more targeted version focuses on ten of the habitats identified in the original Orkney LBAP, introducing new sets of targets and actions for the period 2008-2011.
<b>Subject</b>	Biodiversity Action Planning
<b>Period covered</b>	2008-2011
<b>Frequency of updates</b>	The Orkney LBAP will be updated on a three-yearly basis.
<b>Area of PPS</b>	The county of Orkney and its territorial waters.
<b>Summary of nature/content of PPS</b>	<p>The LBAP is presented as three sections:</p> <p>The first of these provides a brief overview of changes which have been made to the UK Biodiversity Action Planning System since the OLBAP was produced and also presents recently introduced environmental legislation and emerging rural development policy.</p> <p>The second section outlines the process which led to selection of the 10 Habitat Action Plans and presents the new targets and actions.</p> <p>The third section provides information which relates biodiversity in Orkney to the Scottish and UK frameworks.</p>

**Date adopted**

31 July 2008

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

Eileen Summers  
Policy Officer (Environment)  
Policy & Projects  
Department of Development Services  
Orkney Islands Council  
School Place  
Kirkwall  
Orkney  
KW15 1NY  
01856 873535  
eileen.summers@orkney.gov.uk

**Date**

31 July 2008

## **POST-ADOPTION SEA STATEMENT STRATEGIC ENVIRONMENTAL ASSESSMENT PROCESS**

The Orkney Local Biodiversity Action Plan 2008-2011 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 LOCAL BIODIVERSITY  
ACTION PLAN 2008-2011 AND HOW THE  
ENVIRONMENTAL REPORT HAS BEEN TAKEN INTO  
ACCOUNT**

The following paragraphs describe how the environmental problems relevant to the Orkney Local Biodiversity Action Plan 2008-2011 which were addressed in the Environmental Report have been taken into account in the Orkney LBAP 2008-2011.

**1. Global climates are changing as a result of increasing atmospheric levels of greenhouse gases which include CO<sub>2</sub>. Certain soil types represent "sinks" for carbon and their conservation will contribute towards mitigating against further input of CO<sub>2</sub> to the atmosphere.**

One of the ten Habitat Action Plans (HAPs) relates to Coastal Saltmarsh, a habitat which represents a potential 'sink' for carbon. The targets of this HAP are:

- *Establish criteria for favourable condition; and*
- *Survey all saltmarsh sites in order to establish their current condition.*

The actions of the Saltmarsh HAP are:

- *Promote saltmarsh as one of the 'Local Priorities' in the Rural Development Contract Scheme; and*
- *Raise awareness with the appropriate agencies to ensure that road and drainage works do not adversely affect saltmarsh.*

Both actions will highlight best practice in terms of land management and engineering works in order to avoid damaging this habitat.

**2. Loss of biodiversity through loss and fragmentation of habitat.**

All of the targets and actions proposed by the LBAP have been developed with the overarching aim of protecting vulnerable habitats and species. In a number of the HAPs the actions include awareness raising both with members of the public and with the appropriate agencies of actions which may cause damage or harm to habitats or species.

**3. Increasing the areas of certain habitats could result in loss of other valued habitats.**

The progress of the LBAP will be monitored for any unexpected adverse effects on other habitats and species.

**4. Work carried out on habitats with the aim of enhancing them to suit specific species could result in detrimental effects on other species which are reliant on the habitat.**

The progress of the LBAP will be monitored for any unexpected adverse effects on other habitats and species.

**5. Pollution of watercourses.**

A number of the Habitat Action Plans include targets and actions designed to protect or maintain water quality. In particular, the HAPs for Eutrophic Standing Waters and Mesotrophic Standing Waters include the targets:

- *Work towards good ecological status by 2011; and*
- *Have a River Basin Management Plan (RBMP) in place by 2009.*

The related actions are:

- *Implement the RBMP;*
- *Continue to monitor water quality;*
- *Ensure LBAP and RBMP are linked; and*
- *Promote eutrophic standing waters as a Local Priority for Land Management Contracts.*

The Seagrass Beds HAP introduces targets and actions relating to protection of the two *Zostera* species found in Orkney by addressing factors which impact negatively on water quality. Its targets are:

- *Zostera angustifolia* – reduce pollutant-related effects by 2011
- *Zostera marina* – protect from pollutants and human disturbance.

The related actions are:

- Reduce discharge of sewage-related nutrients to the Ouse, Finstown;
- Monitor the health of *Zostera angustifolia* in The Ouse, Finstown;
- Ensure regulators are aware of issues in planning and developments; and
- Raise awareness with appropriate agencies to ensure that road and drainage works do not adversely affect *Zostera* meadows.

The Saline Lagoons HAP target is to encourage establishment of a management forum and plan for the key saline lagoon site, Loch of Stenness, by 2009.

The related actions are:

- Monitor the ecology and water quality of selected saline lagoons;
- Raise awareness with appropriate agencies to ensure that road and drainage works do not adversely affect saline lagoons; and
- Promote saline lagoons as a Local Priority for Land Management Contracts.

## **6. There is potential for increasing frequencies of flood events due to global warming.**

A number of the Habitat Action Plans include targets and actions which are designed to address the increasing risk of flooding. In particular, the HAPs for Eutrophic Standing Waters and Mesotrophic Standing Waters include the targets:

- Work towards good ecological status by 2011; and
- Have a River Basin Management Plan (RBMP) in place by 2009.

The related actions are:

- Implement the RBMP;
- Continue to monitor water quality;
- Ensure LBAP and RBMP are linked; and
- Promote eutrophic and mesotrophic standing waters as Local Priorities for Land Management Contracts.

## **7. Erosion of soil.**

The targets and actions listed under the Coastal Saltmarsh HAP which are discussed above are designed to protect and maintain the condition of saltmarsh sites. Protection of the plant communities will lead to reduced risk of soil erosion as the plant roots act to bind the soil and resist erosion.

## **8. There is a need to protect geology, in particular at sites which provide a good representation of Orkney's geological history.**

Aeolianite is a rare and unusual form of coarse sandstone and the site at Aikerness is one of the most extensive in Britain. The targets and actions of the Aeolianite HAP aim to put in place a management plan for this site and to identify the locations of further Aeolianite sites in Orkney. Management of all these Aeolianite sites will feature in a minerals strategy to be produced by Orkney Islands Council.

## **9. Loss of certain features of the Orkney landscape through changes in land cover.**

A number of the HAPs include actions that aim to protect land cover features which contribute positively to the diversity of the Orkney landscape, e.g. Road verges, Coastal sand dunes, Aeolianite, Coastal vegetated shingle and Coastal saltmarsh.

Many of our road verges contain an abundance of wild flowers which add much appreciated colour and form to the landscape from spring until autumn. In Orkney Islands Council's Road Verge Maintenance Plan a number of verges are classified as Conservation Verges and are left uncut throughout the year in order to allow plants to flower and set seed. The Road Verge HAP includes the target, "by 2011, 58.09 miles of verge, i.e. the Conservation Verges, should be under favourable management." By undertaking a survey of the species assemblages which are present in the Conservation Verges their management may then be adjusted to deter the growth of invasive and tall-growing species such as docks, nettles and hogweed.

Although not a common habitat in Orkney, Aeolianite contributes to localised landscape features through the unusual assemblage of flowering plants which it supports. By carrying out a desk study into its distribution in Orkney and including Aeolianite in the forthcoming Orkney Islands Council Minerals Strategy protection of this relatively rare landscape feature will be increased. As a group of islands, Orkney has a lengthy coastline, much of which includes the habitats Coastal sand dune, Coastal vegetated shingle or Coastal saltmarsh. Implementation of the relevant Habitat Action Plan actions will help protect and enhance these landscapes/seascapes.

**10. Damage to or loss of historic buildings or previously undiscovered archaeology.**

Actions involving excavation or introduction of vegetation, e.g. tree planting, have potential to damage historic buildings or undiscovered archaeology. None of the actions included in the LBAP were assessed as having the potential to directly impact negatively on this historic environment. However it is possible that schemes proposed under the emerging Rural Development Contract schemes could include projects such as wetland or pond creation and might include excavation work. Measures have therefore been identified to mitigate against any such negative impact.

**11. Habitats that are of public interest have the potential to attract more resources and more targeted actions as they will increase public awareness potential at the expense of other habitats that are significant but not as valued or understood in public opinion.**

Certain actions promoted by the LBAP are of public interest, e.g. one of the actions listed in the Coastal Strandline HAP echoes national campaigns to highlight the environmental damage caused by marine litter, in particular plastics. However the Orkney LBAP 2008-2011 also includes an updated HAP for the relatively obscure and unknown habitat **Aeolianite** and through implementation of its actions hope to increase the protection of this habitat and the assemblage of species which it supports.

**12. Use of non-renewable resources, e.g. sand from dune systems.**

Management of Orkney’s coastal sand dune sites will feature in a minerals strategy to be produced by Orkney Islands Council.

**Negative effects identified during production of the Environmental Report**

No negative effects associated with implementation of the Orkney Local Biodiversity Action Plan 2008-2011 were identified during production of the Environmental Report. However, as indicated above, in instances where potential effects were assessed as “uncertain”, appropriate mitigation measures have been proposed. These are presented in Table 1.

**Table 1: Measures envisaged for the prevention, reduction and offsetting of any significant adverse effects**

Issue/Impact identified in ER	Mitigation Measure	Lead Authority	Proposed timescale
<p>Increasing areas of certain habitats could result in loss of other valued habitats.</p> <p>Work on habitats to enhance them for specific species could have detrimental effects on other species reliant on the habitat.</p>	<p>The progress of the OLPAB will be monitored for unexpected adverse effects on other habitats and species. If adverse effects are found to occur the relevant LBAP action will be reassessed by the Steering Group and work on that action will be stopped.</p>	<p>SNH</p>	<p>2009-2011</p>
<p>Trial verge management schemes could result in poorer quality verges</p>	<p>Any trials would be based on research into best management for conservation verges and it is</p>	<p>SNH/OIC</p>	<p>2008-2011</p>

Issue/Impact identified in ER	Mitigation Measure	Lead Authority	Proposed timescale
	anticipated that this would highlight the optimum management scheme.		
RDC schemes relating to Eutrophic Standing Waters and Mesotrophic Standing Waters could include excavation work, e.g. to construct wetland schemes.	Agents acting for applicants to the RDC scheme will be advised that any project relating to either of these HAPs which is likely to include excavation should be assessed for its potential to impact upon the historic environment, in particular in the vicinity of scheduled ancient monuments or with regard to the possible presence of undiscovered archaeological remains. If evidence suggests that negative impact would be likely, then advice should be sought from either Historic Scotland or the Orkney Archaeological Trust	OIC	2008-2011

### **Positive effects identified during production of the Environmental Report**

The effects of the Orkney Local Biodiversity Action Plan 2008-2011 with regard to the SEA Environmental Issues are assessed as overwhelmingly positive, which is unsurprising as it is a plan for environmental improvement. The main positive impacts are summarised in the following paragraphs:

#### Climatic factors

In terms of climatic factors the soils of saltmarshes can represent net storage systems for carbon. Both promotion of Saltmarsh as a Local Priority in the Rural Development Contract scheme, and raising awareness with appropriate agencies of the habitat's vulnerability to road and drainage works will help protect and preserve the plant species of this coastal habitat. The root systems of these plants bind together the soil, helping prevent erosion and subsequent release of stored carbon.

#### Biodiversity, fauna & flora

The overriding aim of the LBAP is to protect and enhance the biodiversity of Orkney so, for each of the HAPs, positive effects will be seen on the biodiversity of that habitat. By adopting an ecosystem approach and selecting several related habitats, i.e. a coastal ecosystem, a significant degree of synergy should be achieved from implementation of the combined actions of these coastal HAPs.

In both of the freshwater HAPs the actions will link the LBAP to both River Basin Management Planning and the Rural Development Contract schemes. This will help ensure that issues relevant to the protection of habitats and species are incorporated into and addressed by these schemes.

#### Water

Of the ten habitat action plans most have an aquatic element - eutrophic standing waters, mesotrophic standing waters, and saline lagoons are water bodies, seagrass meadow is a shallow marine habitat and dunes, vegetated shingle, saltmarsh and the strandline are all coastal habitats. The targets and actions are all designed to improve water quality and reduce inputs of pollutants.

### Soil

Positive impact upon the soil of salt marshes has already been identified above but other examples are found in the eutrophic and mesotrophic standing waters HAPs where implementation of River Basin Management Planning and promotion of these habitats as Local Priorities for the RDC schemes may lead to land owner participation in projects designed to reduce flooding and the associated risk of soil erosion. Actions which protect coastal sand dunes and coastal vegetated shingle will also help protect the soils of land behind these habitats from coastal erosion, particularly if our winters become stormier or if sea level were to rise.

### Geology

Aeolianite is a rare and vulnerable type of rock and the actions which have been proposed will help preserve it both as a geological rock formation and as a habitat for an interesting assemblage of plants.

### Landscape

The actions listed under the HAPs for Road verges, Eutrophic and Mesotrophic Standing Water, Coastal sand dunes and the Strandline are all identified as having the potential to result in positive impact on the landscape of Orkney. This will be achieved through promoting the growth of wildflowers in the verges, maintaining healthy lochs and waterbodies and cleaning up our coasts and shorelines.

### Cultural heritage

It is widely acknowledged that many of Orkney's historic and archaeological sites, both discovered and as yet undiscovered are threatened by coastal erosion. Any actions which protect coastal habitats, e.g. saltmarsh, coastal sand dunes and vegetated shingle will help reduce the risk, or slow the rate, of further erosion and loss of our cultural heritage.

### Human health

The LBAP will lead to improvements in human health through its role in fostering a greater interest and understanding of Orkney's natural heritage and by prompting people to get out and enjoy being in the countryside. For example, production of the information leaflet on Roadside Verges may alert people to watch out for the diversity of attractive flowering species which can be seen along our roads. It is uplifting to see the many, different colourful flowers after a long, grey winter.

In both the eutrophic and mesotrophic standing waters HAPs, implementation of the River Basin Management Plan will lead to reduced levels of diffuse water pollution. Pollutants such as animal slurries and fertilisers lead to elevated aquatic nutrient levels which can allow the rapid growth in water of algal species that are toxic to humans and animals.

In the Coastal Strandline HAP litter along our shores and in our coastal waters will be reduced by the actions designed to raise awareness of marine litter and by provision of a recycling, baling and despatch facility for plastics. Marine litter, especially plastics which persist in the environment for long periods of time present a hazard to marine organisms and humans alike.

### Material assets

Protection of the resources sand and shingle will be enhanced through an action common to the HAPs Coastal sand dunes and Coastal vegetated shingle - production by Orkney Islands Council of a minerals strategy.

**Post-Adoption Sea Statement**  
**How opinions expressed during the consultation have been taken into account (including any consultation required with other EU member states)**

**TABLE 2: LISTS CONSULTATION RESPONSES AND SETS OUT HOW THEY HAVE BEEN TAKEN INTO ACCOUNT**

<b>CONSULTEE / RESPONDENT</b>	<b>SUMMARY OF COMMENTS</b>	<b>HOW COMMENT WAS TAKEN INTO ACCOUNT IN MAKING THE DECISION TO ADOPT THE FINAL PPS</b>
<b>COMMENTS RELATING TO THE ENVIRONMENTAL REPORT</b>		
<p><b>Scottish Environment Protection Agency</b></p>	<p>SEPA is satisfied with all the assessments provided; the comprehensive use of the comments column is welcome.</p> <p>The Authority should note that the comments included in Table 8 relate to the Steering Group's reason for not choosing or choosing the options, whereas SEPA would have expected the comments to relate to how the Responsible Authority arrived at the assessment results presented.</p> <p>In this specific instance SEPA has no detailed comments to make on the Report.</p>	<p>Table 8 has been amended to show how the assessment results were arrived at.</p>
<p><b>The Scottish Ministers (Historic Scotland)</b></p>	<p>Suggest that the analysis in Table 4 should include safeguarding the integrity and setting of all historic environment features, rather than focusing solely on archaeological sites.</p>	<p>Table 4.2 has been amended to include the following text:</p> <p><i>"During implementation of the actions set out in the OLBAP, care should be exercised to safeguard the integrity and setting of all historic environment features."</i></p>
	<p>Suggest that the SEA objective for the historic environment in Table 7 could be widened to include enhancement, where appropriate.</p>	<p>The SEA objective for the historic environment has been amended to:</p> <p><i>"Prevent damage to and, where appropriate, enhance historic sites."</i></p>

CONSULTEE / RESPONDENT	SUMMARY OF COMMENTS	HOW COMMENT WAS TAKEN INTO ACCOUNT IN MAKING THE DECISION TO ADOPT THE FINAL PPS
	<p>Given the uncertainty of impacts potentially associated with Rural Development Contracts, it may be wise to include a mitigation measure in Table 11, perhaps to assess impacts once information becomes available.</p>	<p>Table 11 has been amended to include the following mitigation measure:  <i>"Agents acting for applicants to the RDC scheme will be advised that any project relating to either of these HAPs which is likely to include excavation should be assessed for its potential to impact upon the historic environment, in particular in the vicinity of scheduled ancient monuments or with regard to the possible presence of undiscovered archaeological remains. If evidence suggests that negative impact would be likely, then advice should be sought from either Historic Scotland or the Orkney Archaeological Trust."</i></p>
	<p>I am content with the indicator for reported damage to historic sites. However, such a wide range of monitoring would be the responsibility of the Responsible Authority, rather than Historic Scotland, and you may wish to consider reviewing this. I would be happy to discuss this further should you find it helpful.</p>	<p>Table 12 has been amended to show that it will be the responsibility of Orkney Islands Council to record any instances of reported damage due to implementation of actions set out in the Orkney Local Biodiversity Action Plan to historic sites.</p>
<p><b>Scottish Natural Heritage</b></p>	<p>The Environmental Report presents a detailed SEA which SNH considers is well presented and has addressed all the key requirements under the Act. SNH has no comments to make on the Environmental Report.</p>	<p>N/A</p>
<p><b>John Crossley</b></p>	<p>The composition of the LBAP Steering Group is said to include a local ecologist and chairman of the Orkney Field Club. I attend as a local ecologist but the Steering Group does not include a representative from the OFC.</p>	<p>The text of page 12 of the Environmental Report has been amended.</p>

CONSULTEE / RESPONDENT	SUMMARY OF COMMENTS	HOW COMMENT WAS TAKEN INTO ACCOUNT IN MAKING THE DECISION TO ADOPT THE FINAL PPS
<b>COMMENTS RELATING TO THE ORKNEY LBAP 2008-2011</b>		
<b>Scottish Environment Protection Agency</b>	The reference in Para 1 to the government's preferred choice of name should be re-worded.	Paragraph 1 on page 3 has been re-worded.
	The SEPA grants are so small as to be insignificant so I would remove this from the Plan.	Reference to SEPA's grants has been removed from the Plan.
	<p>The codes of practice in the PEPFAA code are now reinforced by the Diffuse Pollution Regulations as follows:  Amendments have been made to the Controlled Activities Regulations (CAR) by the Scottish Government to include new regulations for diffuse pollution. Effective from 1 April 2008, the Water Environment (Diffuse Pollution) (Scotland) Regulations 2008 are General Binding Rules (GBRs) based on widely accepted standards and codes of practice (e.g. Prevention of Environmental Pollution From Agricultural Activity (PEPFAA), Forest and Water Guidelines, etc). The regulations are risk-based and considered a good example of 'better regulation'. Implementation will mainly be based on guidance, training and awareness raising initiatives. SEPA is the lead competent authority but inspections will be provided via the Scotland's Environmental and Rural Services (SEARS) project. The regulations will provide a statutory baseline of good practice and as such are expected to contribute significantly to improvement.</p>	This section of text has been inserted into the Plan on page 22.
	In terms of saline lagoons, whilst I am content for SEPA to be identified as lead agency for monitoring ecology and quality of the saline lagoons, I would not want that to be a commitment to monitor all such sites on a regular basis.	The text on page 53 has been altered to "Monitor the ecology and water quality of <b>selected</b> saline lagoons."

CONSULTEE / RESPONDENT	SUMMARY OF COMMENTS	HOW COMMENT WAS TAKEN INTO ACCOUNT IN MAKING THE DECISION TO ADOPT THE FINAL PPS
<b>The Scottish Ministers (Historic Scotland)</b>	No comments were made relating to the Orkney LBAP 2008-2011.	N/A
<b>Scottish Natural Heritage</b>	It is important that this document is seen as a targeted revision to the Orkney LBAP 2002. The Audit and Habitat Action Plans from the 2002 document are still relevant and provide the context to the focused Plan for 2008-2011. Any presentation and/or promotion of the 2008-2011 Plan should always make this clear.	The wording of the Introduction to the Orkney LBAP 2008-2011 has been amended to clarify the continuing status of the Orkney LBAP 2002-2007.
Section 1.5	It is also important to note that the Orkney Local Priorities for Rural Development Contracts (RDCs) refer to the habitats and species in the whole document which land managers can consider for inclusion in their RDCs.	The text of page 10 of the Plan has been amended accordingly.
	SGRPID, SNH and FCS <b>"assess"</b> applications against the Rural Priorities.	The text of the Plan has been amended accordingly on page 10, final sentence.
Section 2	Amend title to "Selection of the Ten Habitats for Targeted Action 2008-2011."	The title of Section 2 on page 12 has been amended.
	It needs to be made clear that although many of the actions from the existing Habitat Action Plans (HAPs) are now considered unachievable, the rest of the information is still very relevant. We still encourage people to refer to the HAPs and to utilise the information in them.	The wording of page 12, paragraph 2 has been amended to clarify the continuing status of the Orkney LBAP 2002-2007.
	Suggest the Orkney LBAP is a more <b>"targeted"</b> plan.	The text of page 12, paragraph 4 has been amended accordingly.
	Suggest that a sentence is added at the end of the explanation of the selection process that highlights that this is a rolling process. Suggest: <b>"it is anticipated that a similar selection process will be undertaken to identify the 10 habitats for targeted action in 2011-2013."</b>	This sentence has been inserted into the text of page 13, paragraph 2.

<b>CONSULTEE / RESPONDENT</b>	<b>SUMMARY OF COMMENTS</b>	<b>HOW COMMENT WAS TAKEN INTO ACCOUNT IN MAKING THE DECISION TO ADOPT THE FINAL PPS</b>
	Suggest that clarification is added into this section that the numbering of the 10 HAPs in this Plan follows the numbering from the main LBAP.	The text of the Plan has been amended accordingly on page 12, final sentence.
	Suggest that clarification is provided in each Habitat Action Plan as to the relevance/purpose of the list of species provided at the end of each HAP. These were the species identified by the Steering Group as being "keynote" or iconic species that could be used when promoting and/or raising awareness of the particular habitat.	These species are now referred to as "Keynote Species".
<b>John Crossley</b>	It is important that this document is seen as a targeted revision to the Orkney LBAP 2002. The Audit and Habitat Action Plans from the 2002 document are still relevant and provide the context to the focused Plan for 2008-2011. Any presentation and/or promotion of the 2008-2011 Plan should always make this clear.	The wording of the Introduction to the Orkney LBAP 2008-2011 has been amended to clarify the continuing status of the Orkney LBAP 2002-2007.
	The table of habitats in Appendix B3 does not reflect the revisions made to it in 2006 and 2007 by the local Steering Group	New lists of habitats, both terrestrial and marine have been included as Appendices to the LBAP 2008-2011.
	Appendix B2 presents the current list of Sites of Local nature Conservation Interest along with designation and qualifying interests. We know that these descriptions are not representative of the full interests of these sites, and in many cases this can be misleading. The listing needs to be qualified with this information and the need for a revision.	The SLNCIs are currently being reviewed and more accurate descriptions of the interests of each site will be included in the forthcoming re-write of the Orkney Local Plan.
	The UK BAP list of habitats and species has been very substantially revised during 2007. The changes to the habitats were addressed by the local steering group and the Orkney species list should also be revised to take account of changes to both the UK BAP list and the introduction of the Scottish Biodiversity List.	New lists of species occurring in Orkney and which feature on the UK BAP list and the Scottish Biodiversity List have been included as Appendices to the LBAP 2008-2011.

<b>CONSULTEE / RESPONDENT</b>	<b>SUMMARY OF COMMENTS</b>	<b>HOW COMMENT WAS TAKEN INTO ACCOUNT IN MAKING THE DECISION TO ADOPT THE FINAL PPS</b>
	In each of the ten Habitat Action Plans the attached list of species is headed National Priority Species (following the style of the original LBAP document). Now that we have the UK Priority List and the Scottish Biodiversity List, I suggest changing "National" to "UK" and inclusion of Scottish Biodiversity List species.	The tables have been modified and species are now listed under the headings <i>UK BAP List</i> ; <i>Scottish Biodiversity List</i> and <i>Local Priority Species</i> .
	At the end of each of the ten HAPs, certain species have been listed which are representative of the habitat. However their significance could be made clearer.	These species are now referred to as "Keynote Species".
<b>Eric Meek (RSPB)</b>	It is important that this document is seen as a targeted revision to the Orkney LBAP 2002. The Audit and Habitat Action Plans from the 2002 document are still relevant and provide the context to the focused Plan for 2008-2011. Any presentation and/or promotion of the 2008-2011 Plan should always make this clear.	The wording of the Introduction to the Orkney LBAP 2008-2011 has been amended to clarify the continuing status of the Orkney LBAP 2002-2007.

## **POST-ADOPTION SEA STATEMENT REASONS FOR CHOOSING THE ORKNEY LOCAL BIODIVERSITY ACTION PLAN 2008-2011 AS ADOPTED, IN THE LIGHT OF OTHER REASONABLE ALTERNATIVES**

Three alternatives were considered for the Orkney Local Biodiversity Action Plan 2008-2011:

**1. Use the existing format for the LBAP with habitat definitions remaining similar, updating only the targets and actions and maintaining the 5-year monitoring cycle.**

**2. Use the existing format for the LBAP with habitat definitions remaining similar but including additions from both terrestrial and marine elements of the Scottish Biodiversity List. Include new Species Action Plans, maintaining the 5 year monitoring cycle**

**3. Complete overhaul of the introduction and habitat plans with only minor updates to the audit. The plan would consist of 2-3 ecosystems each comprising up to 4 habitats, each with targeted actions on Scottish Biodiversity List species. An ecosystem from both the terrestrial and marine environment would be compiled. The LBAP would be monitored on a 3-yearly basis.**

The original LBAP featured over 400 actions which were to be implemented over five years. However, by the end of the plan period a number of these remained undone for reasons which included: constraints on time and resources; finding that certain actions did not fit within the remit of any organisation and changes to environmental legislation.

Under **Option 1** a new plan would have been written to the same style as the existing LBAP and there would have been a risk that once again some of the actions may not have been completed and targets perhaps would not have been met. Also, the 5-year period does not complement the 3-year period of the UK plans and the Scottish Biodiversity Implementation Plans which were introduced along with the Scottish Biodiversity Strategy. Ideally actions should be entered into the web-based Biodiversity Action Reporting System (BARS) which allows progress to be reported on at a UK level so the plan needs to fit in with the 3-year reporting period.

The above also applies to **Option 2** which would have incorporated certain elements of the Scottish Biodiversity planning system whilst still maintaining a 5-year cycle. Option 2 also proposed the production of Action Plans focused at a species level.

**Option 3** was selected and the introduction to the LBAP was re-written to incorporate the many changes which have taken place in biodiversity planning in the UK since the original Orkney LBAP was published in 2002. These introductory sections summarise changes to the following:

- Biodiversity action planning – the national context
- Developments in environmental legislation relevant to the OLBAP
- Biodiversity and the Local Authority planning system
- Biodiversity and rural development policy
- Links with the Biodiversity Records Centre

Rather than make changes to the audit, a set of four appendices was also included containing:

1. lists of Orkney species which appear on the recently revised (2007) UK Biodiversity Action Plan (UKBAP) List;
2. a table showing a revision of habitat types and names listed in the OLBAP, reflecting both recent changes to the list of UKBAP habitats and developing understanding of Orkney habitats;

3. lists of Orkney species which appear on the Scottish Biodiversity List that was introduced in 2005; and
4. a table showing correspondence between terrestrial habitat types listed in the OLBAP and those of the Scottish Biodiversity List.

The Habitat Action Plans of ten habitats from 3 ecosystems - freshwater, coastal, and boundary and linear features - were selected for the new plan in the belief that more will be achieved for biodiversity through following the ecosystem approach than through concentrating a similar amount of effort on individual Species Action Plans. Each of these habitats includes species from the Scottish Biodiversity List. The LBAP introduces a total of 42 new actions which have been designed to be SMART (Specific, Measurable, Achievable, Realistic and Time-based) and which will easily be entered and reported on in the BARS system.

With its 3-year timescale the Orkney Local Biodiversity Action Plan 2008-2011 is compatible with both the UK and the Scottish Biodiversity Implementation Plans.

**Post-Adoption Sea Statement  
Measures that are to be taken to monitor  
significant environmental effects of the  
implementation of the PPS**

The proposed SEA monitoring activities are set out in table 3 below.

**Table 3: Proposed SEA monitoring programme for the Orkney Biodiversity Local Action Plan**

<b>Issue identified in ER</b>	<b>Data source, frequency of monitoring</b>	<b>Summary of proposed remedial action (if information is available)</b>	<b>Timescale and responsibility</b>
Changes to Orkney's climate in line with changes to global climate patterns.	OIC Harbours weather data		Annual  OIC
Potential for damage to and loss of saltmarsh, a sink for carbon.	Survey of all saltmarsh sites to establish their current condition		To be confirmed  (one of action plan targets)  SNH
	Number of applications for RDC schemes involving management of saltmarsh		Annual  SNH/ SGRPID
	Reported damage to protected sites (SAC, SPA, SSSI)	Information regarding protected sites in Orkney will be distributed to relevant OIC departments, e.g. Roads Department, Engineering Services.	Annual  SNH
	Number of successful licence applications for derogations of the Habitats Directive to disturb European Protected Species (otter)		Annual  SNH and SGRPID
<b>Biodiversity</b>	Achievement of LBAP targets through implementation of actions set out in each Habitat Action Plan		Annual  OIC
<b>Biodiversity</b>	Data from the Beached Bird Survey (corpses picked up from		Annual  RSPB

<b>Issue identified in ER</b>	<b>Data source, frequency of monitoring</b>	<b>Summary of proposed remedial action (if information is available)</b>	<b>Timescale and responsibility</b>
	strandline)		
<b>Biodiversity</b>	Data from the survey of SLNCIs (to provide improved baseline data)		RSPB/FWAG 2006 -2009
<b>Biodiversity</b>	Wetland Bird Survey (WEBs)		Annual RSPB
<b>Biodiversity</b>	Mute swan survey		Annual RSPB
<b>Biodiversity</b>	Wader survey data (to provide improved baseline data)		RSPB 2006/07
<b>Biodiversity</b>	Site condition monitoring – Sites monitored each year will vary – historical records would be useful to reference as baseline data		Annual SNH
<b>Water</b>	Water quality data from routine monitoring of watercourses in Orkney		Annual SEPA
<b>Water</b>	Number of abstraction licences		Annual SEPA
<b>Water</b>	Number of applications for RDC schemes involving management of eutrophic or mesotrophic standing waters or saline lagoons		Annual SNH/ SGRPID
<b>Soil</b>	Suspended solids data from routine monitoring of watercourses in Orkney		Annual SEPA
<b>Geology</b>	Number of applications for RDC schemes involving management of aeolianite		Annual SNH/ SGRPID
<b>Landscape</b>	Site condition monitoring – different types of site are monitored each year		Annual SNH
<b>Cultural heritage</b>	Uptake of road verge leaflets from World Heritage Site		Annual Historic Scotland

<b>Issue identified in ER</b>	<b>Data source, frequency of monitoring</b>	<b>Summary of proposed remedial action (if information is available)</b>	<b>Timescale and responsibility</b>
<b>Cultural heritage</b>	Reported damage to historic sites due to implementation of LBAP actions	The relevant LBAP action will be reassessed by the LBAP Steering Group and mitigative measures will be discussed with Historic Scotland	Annual Historic Scotland
<b>Human Health</b>	Life expectancy trends in Orkney		Annual OIC
<b>Human Health</b>	Length of paths and number of new paths in Orkney		Annual OIC
<b>Population</b>	Population trends in Orkney Islands		Annual OIC
<b>Material assets</b>	Quantities of plastics despatched for recycling		Annual OIC
<b>Material assets</b>	Achievement of LBAP targets through implementation of actions set out in each Habitat Action Plan		Annual OIC
<b>Material assets</b>	Number of appropriate plans/policies/strategies that take account of the LBAP		Annual OIC

### **POST-ADOPTION SEA STATEMENT**

For the purposes of the SEA Environmental Report, additional baseline information was collated relating to the distribution and extent of the ten habitats included in the Orkney Local Biodiversity Action Plan 2008-2011. It is intended that this information will be reproduced on maps during the lifetime of the Plan.