

Item: 12

Development and Infrastructure Committee: 26 March 2024.

Provision of Toilets in Brodgar-Stenness Area of World Heritage Site.

Report by Corporate Director for Enterprise and Sustainable Regeneration.

1. Purpose of Report

To consider options for toilet provision in the Brodgar-Stenness area of the Heart of Neolithic Orkney World Heritage Site (WHS).

2. Recommendations

The Committee is invited to note:

2.1.

That the Heart of Neolithic World Heritage Site is a place of Outstanding Universal Value to humanity, which attracts more visitors than it can sustainably accommodate.

2.2.

That the combination of unrestrained tourism growth and unmanaged footfall has had detrimental impacts on the World Heritage Site's natural and cultural heritage as well as community and visitor safety and wellbeing.

2.3.

That the increasing volume of visitors to the Ring of Brodgar and lack of toilet provision has led to undesirable toileting behaviour near the car park, which has been highlighted as a key concern by local stakeholders.

2.4.

That, although the Orkney World Heritage Site Gateway Programme seeks to address the various issues and has been allocated £6.5 million of Islands Growth Deal funding from the Scottish and UK Governments, it will be years before the projects are completed.

2.5.

That, while there is an urgent need for decisive action, the Brodgar-Stenness area is one of the most fragile landscapes in Scotland and, consequently, resolving an issue such as toilet provision is significantly more complex than it would be elsewhere.

2.6.

That, on 30 November 2023, when considering resource provision to enhance responsible tourism management in Orkney, the Policy and Resources Committee recommended:

- That the provision of toilet facilities within the Heart of Neolithic Orkney World Heritage Site be further considered by the Development and Infrastructure Committee no later than March 2024.

2.7.

That, since 30 November 2023, constructive discussions have been held with Historic Environment Scotland, Highlands and Islands Enterprise and Council officers, reconfirming and demonstrating a partnership approach and commitment to addressing the issues affecting the World Heritage Site.

2.8.

That, accordingly, an options appraisal for toilet provision in the Brodgar-Stenness area of the World Heritage Site has been undertaken and is attached as Appendix 1 to this report.

2.9.

That each of the short-listed options, as outlined in section 4.3 of this report and fully detailed in the Options Appraisal attached as Appendix 1, proposes a combination of physical and digital elements to improve visitor management in the World Heritage Site.

2.10.

That the preferred option, Option 3, which comprises physical and digital elements as detailed in section 4.5 of this report, offers a permanent solution for toilets at the Brodgar car park.

2.11.

That, given the complexity of the proposed development and that Option 3 is unlikely to be completed before 2027, Option 1 could be actioned immediately as interim mitigation to reduce impacts, with the following measures in place for the 2024 tourism season:

- Monthly Brodgar car park cleaning between May and September.
- Toilet access for cruise ship passengers at Hatston Pier.
- Directional signage to nearest toilet facilities.
- Online directions and navigation to nearest toilet facilities (also included in Option 3).
- Promotion of responsible enjoyment of the World Heritage Site (also included in Option 3).

It is recommended:

2.12.

That Option 3, namely the provision of permanent toilet facilities at the Brodgar car park and accompanying infrastructure improvements, be approved, with the digital elements progressed through the Islands Growth Deal on an accelerated timetable, subject to Orkney World Heritage Site Gateway Programme Board approval and Islands Growth Deal change process.

2.13.

That, subject to a match contribution from Historic Environment Scotland, provision not exceeding £40,000 be made, from the Strategies, Studies and Project Initiation budget for 2025/26, to progress Phase 1 development of the physical elements of Option 3.

2.14.

That Option 1 be approved for immediate progression, with the following elements funded from existing Enterprise and Economic Growth Service budgets:

- Monthly Brodgar car park cleaning between May and September in 2024, 2025 and 2026.
- Directional signage to nearest toilet facilities.

3. Background

3.1.

The Heart of Neolithic Orkney is a place of Outstanding Universal Value to humanity and as such, was inscribed on the World Heritage List in 1999 to be protected for future generations to appreciate and enjoy.

3.2.

For decades, the WHS has formed the centrepiece of Orkney's tourism offer, with images of the four main monuments (i.e., Skara Brae, Maeshowe, Ring of Brodgar and Stones of Stenness) adorning brochures and websites around the world. As a result, every first-time visitor to Orkney makes a pilgrimage to the WHS and their experience of it shapes their entire understanding of Orkney, Scotland, and the Neolithic period globally. Moreover, years of surveys have identified the Islands' natural and cultural heritage as the leading reason for visitation and the WHS has been a critical driver in the growth of tourism in Orkney and the cruise sector, in particular.

3.3.

The WHS attracts more visitors than it can sustainably accommodate. For reference, visitor numbers for 2023 were:

- Ring of Brodgar – 174,000 (estimated).
- Stones of Stenness – 76,500 (estimated).
- Maeshowe – 15,074.
- Skara Brae – 106,839.

3.3.1.

Accurate figures are available for Maeshowe and Skara Brae as access to these sites is actively managed, with advance online booking encouraged.

3.4.

The combination of unrestrained tourism growth and unmanaged visitor footfall have had detrimental impacts on the WHS's natural and cultural heritage as well as the community and visitor's safety and wellbeing. In the Brodgar-Stenness area and at the Ring of Brodgar, in particular, the following concerns persist:

- Damage to the monuments.
- Wear on the fragile vegetation and underlying archaeology by visitor footfall.
- Climate change impacts from precipitation change and storm intensity and frequency, exacerbated by increased footfall.
- Overcrowding at the sites and in their car parks.
- Compromised road safety and deteriorating road structures due to increasing traffic volume on the single track B9055 during peak season.
- Visual intrusion of coaches upon the monuments and wider landscape.
- Environmental health risk due to undesirable toileting behaviour and (anecdotal) irresponsible campervan cassette toilet waste disposal.

3.5.

The Orkney World Heritage Site Gateway (OWHSG) Programme seeks to address the various issues and has been allocated £6.5 million of Islands Growth Deal funding from the Scottish and UK Governments. However, decisions on fundamental project elements, costs, partner investment, delivery timetable, operational arrangements, and other considerations are still to be confirmed and it will, therefore, be years before the projects are completed.

3.6.

The Brodgar-Stenness area is one of the most fragile landscapes in Scotland, with multiple historic and cultural heritage designations in place to protect special features and characteristics, all of which contribute to the Outstanding Universal Value of the WHS. Designations include:

- Brodgar Rural Conservation Area.
- Scheduled Monuments (various).
- Loch of Stenness Special Area of Conservation.
- Lochs of Stenness and Harray Site of Special Scientific Interest.
- Brodgar, Loch of Harray Local Nature Conservation Reserve.
- Hoy and West Mainland National Scenic Area.
- Habitat for protected bird and other species.

3.7.

While there is a need for decisive and expedited action, the sensitivity of the Brodgar-Stenness area means that resolving an issue such as toilet provision is significantly more complex than it would be elsewhere. Moreover, if considered and implemented in isolation, purported solutions would likely generate other more significant problems, with knock-on effects on the WHS and its setting, community, local businesses, and visitors.

3.8.

A report to consider resource provision to enhance responsible tourism management in Orkney was submitted to the Policy and Resources Committee on 30 November 2023. The report included a recommendation that the Council seek to install and operate temporary toilets at the Ring of Brodgar car park for a three-year period. However, it was felt that the matter required further discussion and consideration of alternative options, and the Committee, therefore, recommended that the provision of toilet facilities within the WHS be further considered by the Development and Infrastructure Committee no later than March 2024.

3.9.

Accordingly, an Options Appraisal of toilet provision in Brodgar-Stenness area of the WHS, undertaken in consultation with Council officers and colleagues from partner organisations, is attached as Appendix 1 to this report.

4. Proposed Solutions

4.1.

A common approach to minimising adverse impacts is facility development and site hardening. However, while such improvements provide benefits, they typically attract more visitors who, in turn, cause further damage. Therefore, effective visitor management is an essential strategy for protecting sites and the environment in which they sit and managing impacts.

4.2.

It has been clear for some time that more robust visitor management measures are required across the WHS. These can not only minimise and mitigate visitor impacts but also improve the visitor experience and realise sustainability outcomes for the community. Achieving this will require a combination of measures, including:

- Limiting visitor numbers to match capacity.
- Adapting the resource to sustain visitation and minimise impacts.
- Modifying visitor behaviour.

4.3.

A number of interventions were considered and the three options below were short-listed. Each option proposes a combination of physical and digital elements to improve visitor management in accordance with the approach detailed at section 4.2 above. Details of each option, together with anticipated impacts of implementation, are provided in the Options Appraisal at Appendix 1.

Short-listed Options		Soonest delivery*
Option 1.	Do minimum.	2024
Option 2.	Site temporary toilets in the Brodgar car park.	2025
Option 3.	Install permanent toilets in the Brodgar car park.	2027

**Subject to key considerations outlined at section 5.1 of this report.*

4.4.

Option 3 is the preferred option for the following reasons:

- While both Options 2 and 3 directly address the toileting and waste disposal issues in the Brodgar car park, only Option 3 proposes permanent solutions.
- Of all the options, Option 3 has the greatest potential to generate long-term sustainability outcomes.
- Both Options 2 and 3 would require substantive environmental investigations, planning permission, and the introduction of physical and digital visitor management measures. While Option 2 could potentially be delivered by the 2025 season, this is not guaranteed and there is a question of whether investment in temporary measures represents best value when a permanent solution could potentially be in place two years later.

4.5.

Option 3 comprises the following physical and digital elements which, collectively, have the potential to transform visitor management in the WHS:

Physical (Brodgar car park)	Digital
Permanent toilets.	Coach booking system.
Car park refurbishment.	Visitor information and management app system.
Automatic number-plate recognition camera.	WHS website.
Toilet signage.	Online directions and navigation to nearest toilet facilities in Stenness (immediate implementation).
	Promotion of responsible enjoyment of the WHS via a new responsible tourism page on Orkney.com and related messaging across partner websites and other channels (immediate implementation).

4.6.

Given the complexity of proposed development, Option 3 is unlikely to be completed before 2027. However, Option 1 could be actioned immediately as interim mitigation to reduce impacts, with measures in place this year. These would include:

- Monthly Brodgar car park cleaning between May and September.
- Toilet access for cruise ship passengers at Hatston Pier.
- Directional signage in the Brodgar car park and Stenness village to nearest toilet facilities.
- Online directions and navigation to nearest toilet facilities in Stenness (also included in Option 3).
- Promotion of responsible enjoyment of the WHS via a new responsible tourism page on Orkney.com and related messaging across partner websites and other channels (also included in Option 3).

4.7.

Toilet facilities are available year-round within the Skara Brae Visitor Centre and Historic Environment Scotland (HES) has seasonally supplemented this provision for several years. However, increased visitation now requires the seasonal toilets to be in place beyond the current 28-day period permitted without requirement for a planning application.

4.7.1.

HES has suggested that it may be an option to seek temporary planning and other permissions to enable provision of supplementary seasonal (i.e., up to 6 months per year) toilets for 5 years. This period would bridge the gap between now and proposed refurbishment of the visitor centre via the OWHSG Programme.

4.7.2.

As an early estimate, the extended supplementary toilet provision could require an additional investment by HES of approximately £14,000 per annum. However, before a decision can be taken, an analysis of the practicalities and cost implications of installing temporary toilets versus potentially accelerating the visitor centre refurbishment timetable will have to be completed. The analysis will be undertaken this year. In the meantime, supplementary toilets will be available at Skara Brae for 28 days during the 2024 season.

5. Next Steps

5.1.

The Brodgar car park sits in a highly sensitive environment and there are, therefore, myriad factors to be considered in relation to delivering the physical elements proposed in Option 3, as outlined at section 4.5 of this report. Described more fully in the Options Appraisal at Appendix 1, these include (but are not limited to):

- Duty to provide public toilets.
- Criminal offence.
- Waste.
- OWHSG Programme.
- Historic and natural environment.
- Planning permission.
- Building warrant.
- Carrying capacity.
- Available utility services.
- Unintended consequences.

5.2.

Furthermore, there is any number of unknown variables that can and will materialise as the project is developed. Therefore, the following phased approach, with internal governance and project development milestones, is proposed to progress the physical elements of the preferred option and ensure management of risk, costs, and other factors:

Phase	Description
Phase1	<p>March 2024</p> <p>Development and Infrastructure Committee considers proposals and budget request relating to progression of project strategic definition, and preparation and briefing stages (RIBA Stages 0/1).</p> <p>RIBA Stages 0/1 would involve historic, environmental, and survey works and strategic appraisal of planning considerations to confirm project requirements and determine whether they can be achieved on such a sensitive site and, if yes, the best means of doing this.</p>
Phase 2	<p>November 2024*</p> <p>Assuming Step 1 confirms that the project is indeed feasible, Development and Infrastructure Committee considers proposals and budget request relating to progression of concept design and spatial coordination stages (RIBA Stages 2/3), and related external funding application(s).</p> <p>RIBA Stages 2/3 would involve development of an architectural concept aligned with the project brief and in accordance with pre-planning advice, and then spatial coordination of architectural and engineering information and preparation and submission of a planning application. Subject to Scottish Government budgets, the project would be eligible for a design grant of £20,000 via VisitScotland's Rural Tourism Infrastructure Fund (RTIF) and, subject to approval, a grant application would be submitted at this stage.</p> <p><i>* provided specialists do not advise that environmental investigations must be delayed to a later time (e.g., so as not to disturb breeding birds)</i></p>
Phase 3	<p>Timing to be confirmed at Step 2</p> <p>Policy and Resources Committee considers Stage 2 Capital Project Appraisal including proposals and capital budget request relating to progression of technical design and construction stages (RIBA 4/5), and related external funding application(s).</p> <p>RIBA Stages 4/5 would involve completion of all design information required to construct the project followed by construction.</p> <p>Subject to Scottish Government budgets, the project would be eligible for a capital grant of up to £750,000 (with up to 25% match required) via the RTIF and, subject to approval, a grant application would be submitted at this stage.</p>

5.3.

It would be important to note that due to the high sensitivity of the site, the amount of specialist surveys and reports required to comply with legislation and policy during the planning process will likely be considerable and greater than planning applications for development in less sensitive areas.

5.4.

Development in the Brodgar-Stenness area is highly regulated, with some enforcement by external bodies. It is, therefore, essential to recognise that viability of the proposed development will rely heavily upon the ability to comply with regulatory provisions in place to protect natural and cultural heritage.

5.5.

Should the recommendations of this report be approved, it is proposed that the digital elements of the preferred option would be progressed through the Islands Growth Deal on an accelerated timetable, and subsequently, OWHSG Programme Board approval and Islands Growth Deal change process.

5.6.

It is intended that the digital elements of the preferred option would be delivered concurrently with the physical elements.

6. Human Resource Implications

6.1.

The phased approach to progressing the physical elements of the preferred option, as outlined at section 5.2 of this report, would be resourced as follows:

- Project management (on a fees basis) by officer resource within the Property, Asset Management and Facilities Service.
- Phase 1 RIBA 0/1 stages of work described at section 5.2 of this report would be outsourced to architects already retained by the Council through a procurement process.
- Client oversight, internal governance, and coordination with OWHSG Programme Board and Islands Growth Deal by officer resource within the Enterprise and Economic Growth Service.

6.2.

Recruitment of an OWHSG Programme Manager, a 3-year post jointly funded by the Council and HES, is underway and, subject to a successful appointment, an officer would be expected in post by April 2024 at the earliest.

6.3.

Subject to successful recruitment, and OWHSG Programme Board approval and Islands Growth Deal change process, referred to at section 5.5 of this report, the three key digital elements of the preferred option (i.e., coach booking system, visitor information and management app system, and WHS website) would be progressed by the OWHSG Programme Manager.

6.4.

Option 1 interventions set out at section 4.6 of this report would be delivered by existing officer resource within the Enterprise and Economic Growth Service.

7. Links to Council Plan

7.1.

The proposals in this report support and contribute to improved outcomes for communities as outlined in the Council Plan strategic priority of Growing our economy.

7.2.

The proposals in this report relate directly to Priority E2 Support for local business of the Council Delivery Plan.

8. Links to Local Outcomes Improvement Plan

The proposals in this report support and contribute to improved outcomes for communities as outlined in the Local Outcomes Improvement Plan priority of Sustainable Development.

9. Financial Implications

9.1.

The estimated cost to progress Phase 1 of development of the physical elements of the preferred option outlined at section 5.2 of this report would be up to £60,000, comprising fees for external surveys, environmental and historical studies and reports, and internal project management. 50% of the cost (up to £30,000) would be allocated from the Strategies, Studies and Project Initiation budget and the remaining 50% would be contributed by HES.

9.2.

At this stage, the scope of works described at section 5.2 of this report has not yet been fully defined and, accordingly, the £60,000 figure quoted above is a high-level cost estimate, calculated in consultation with external architects. If the scope reduces, the costs would be adjusted accordingly. Conversely, if the scope requires to be expanded, supplementary costs would be shared by the Council and HES, with the Council's share capped at an additional £10,000 from the Strategies, Studies and Project Initiation budget.

9.3.

Estimated costs to progress Option 1 as interim mitigation, as outlined in section 4.6 of this report, would be up to £1,000 per annum for monthly Brodgar car park cleaning during the 2024, 2025 and 2026 seasons (May – September) and up to £4,000 for installation of directional signage, which can be met from existing Enterprise and Economic Growth Service revenue budgets.

9.4.

The digital elements of the preferred option were previously estimated at £550,000. However, in the development of Option 3, those costs would be updated and progressed through the Islands Growth Deal on an accelerated timetable, subject to OWHSG Programme Board approval and Islands Growth Deal change process.

10. Legal Aspects

10.1.

The Council has a statutory duty to make arrangements which ensure best value. The Council must consider whether the progression of Option 3 as set out in the recommendations of this report will assist the Council in discharging this duty.

10.2.

The Council owns the Brodgar car park and surrounding land totalling 1.317 hectares.

10.3.

There is no statutory requirement for the Council to provide public toilets.

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12. Appendix

Appendix 1: Options Appraisal.



Options Appraisal Heart of Neolithic Orkney: Toilet Provision

March 2024

Enterprise and Economic Growth
Orkney Islands Council

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1. Introduction

1.1. Background

A report to consider resource provision to enhance responsible tourism management in Orkney was submitted for the Council's Policy and Resources Committee's consideration at a meeting on 30 November 2023. The report included a recommendation that the Council seek to install and operate temporary toilets at the Ring of Brodgar car park for a three-year period. However, it was felt that the matter required further discussion and consideration of alternative options, and the Committee, therefore, recommended that the provision of toilet facilities within the Heart of Neolithic Orkney World Heritage Site (WHS) be further considered by the Development and Infrastructure Committee no later than March 2024.

Accordingly, an appraisal of options for toilet provision in the Brodgar-Stenness area of the WHS was undertaken. A detailed review of the significant challenges and numerous factors, and possible courses of action are set out in this report, concluding with recommendations for the Development and Infrastructure Committee's consideration at their next meeting on 26 March 2024.

1.2. The perennial problem

The WHS attracts more visitors than it can sustainably accommodate. The combination of unrestrained tourism growth and unmanaged footfall in the Brodgar-Stenness area and at the Ring of Brodgar, in particular, has had detrimental impacts on natural and cultural heritage as well as the community and visitor's safety and wellbeing. Indeed, there have been issues which have persisted for more than 25 years¹ such as damage to the monuments; wear on the fragile vegetation and underlying archaeology by visitor footfall; visual intrusion of coaches upon the monuments and wider landscape; and increasing visitor traffic on the single track B9055 during peak season. More recently, visitor numbers have surged and accordingly, there are increasing instances of congestion at the sites and in their car parks. Also, stakeholders have raised concerns about undesirable toileting behaviour and irresponsible campervan cassette toilet waste disposal next to the Brodgar car park, and the consequences for human and environmental health.

The Orkney WHS Gateway (OWHSG) Programme seeks to address the various issues and has been allocated £6.5 million of Islands Growth Deal funding from the Scottish and UK Governments. Decisions on certain fundamental elements, costs, partner investment, delivery timetable, operational arrangements, and other considerations are still to be confirmed and it will, therefore, be years before the projects are completed.

The need for decisive action is more urgent than ever. However, the Brodgar-Stenness area is one of the most fragile landscapes in Scotland, with multiple designations in place to protect its cultural and natural heritage, and consequently, resolving an issue such as toilet provision is significantly more complex than it would be elsewhere. Moreover, if considered and implemented in isolation, purported solutions could potentially generate other more significant problems, with knock-on effects on the WHS and its setting, community, local businesses, and visitors.

¹ Ironside Ferrar Ltd (1998) Brodgar Visitor Management Plan

1.3. Stakeholder consultation

Consultation with officers from the following Council services has been undertaken to inform this options appraisal:

- Environmental Health
- Development and Marine Planning
- Development Management
- Roads Support
- Building Standards
- Enterprise and Economic Growth
- Property, Asset Management and Facilities
- Marine Services

Colleagues from partners organisations, Historic Environment Scotland (HES) – Heritage, Operations, and External Relations and Partnerships directorates – and Highlands and Islands Enterprise (HIE), have also contributed.

However, given the limited time to undertake this options appraisal, it has not been possible to consult as in-depth or widely as necessary to definitively inform the way forward. This is especially vital as any action can and will affect not only existing strategic plans and projects, but other stakeholders and community and visitor wellbeing as well.

2. Heart of Neolithic Orkney World Heritage Site

2.1. World Heritage

World Heritage is the designation for places on Earth that are of outstanding universal value (OUV) to humanity and as such, have been inscribed on the World Heritage List to be protected for future generations to appreciate and enjoy².

OUV is defined in Paragraph 49 of the United Nations Educational, Scientific and Cultural Organization (UNESCO) Operational Guidelines as

cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations of humanity. As such, the permanent protection of this heritage is of the highest importance to the international community as a whole.

To be deemed of OUV, UNESCO requires that World Heritage Sites have adequate protection and effective management measures in place to ensure its safeguarding³.

2.2. Orkney's WHS⁴

Inscribed by UNESCO in 1999, the Heart of Neolithic Orkney comprises a series of domestic and ritual prehistoric monuments and associated standing stones and mounds that are unquestionably among the most important Neolithic sites in Western Europe. These include:

- **Skara Brae** is a 5,000-year-old domestic settlement whose stone walls, passageways and stone furnishings, such as beds and dressers, survive to the present day. It is situated on the Bay of Skail on the west coast of Mainland.
- **Maeshowe**, a chambered tomb, is an extraordinary example of Neolithic architectural genius. It was designed to allow the setting sun at the winter solstice to shine up the passageway and illuminate the chamber. The **Barnhouse Stone** to the south is aligned with the passageway and the winter sunset.
- The **Stones of Stenness** circle and henge is a very early example of this type of monument. The surviving stones stand up to 6 metres in height. Nearby, the 5.6-metre-tall **Watch Stone** stands at the end of the Brodgar Bridge.
- The **Ring of Brodgar**, a great stone circle 130 metres across, and a series of associated mounds and a stone setting known as the Comet Stone lie a short distance to the north, on the peninsula that divides the Loch of Harray from the Loch of Stenness. The larger mounds are named Salt Knowe, Fresh Knowe and Plumcake Mound.

The group constitutes a major prehistoric cultural landscape which gives a graphic depiction of life in this remote archipelago in the far north of Scotland some 5,000 years ago⁵. They are an outstanding example of an architectural ensemble and archaeological landscape that

² UNESCO [What is World Heritage?](#)

³ UNESCO [Operational Guidelines for the Implementation of the World Heritage Convention](#)

⁴ Historic Environment Scotland, Orkney Islands Council, Royal Society for the Protection of Birds, Scottish Natural Heritage (2016) [The Heart of Neolithic Orkney World Heritage Site Management Plan 2014-2019](#)

⁵ UNESCO [Heart of Neolithic Orkney](#)

illustrate a significant stage of human history – the age when the first large ceremonial monuments were built. Moreover, individual monuments are considered technologically ingenious and monumental masterpieces, displaying the highest sophistication in architectural ability⁶. Further detail is provided in the Statement of OUV at Appendix 1.

2.3. The Buffer Zone⁷

A Buffer Zone is an area surrounding the WHS that gives an added layer of protection to the Site. UNESCO guidance is that Buffer Zones should include the immediate setting of the Site, important views and other areas or attributes that are functionally important as a support to the Site and its protection and should have complementary legal and/or customary restrictions placed on their use and development. A Buffer Zone highlights an area where potential impacts need to be given careful consideration by developers and decision-makers, but is not formally a part of the inscribed WHS.

The WHS boundaries are tightly drawn and do not include the wider landscape setting that provides the essential context of the monuments, nor other monuments such as Barnhouse and Ness of Brodgar that contribute greatly to understanding of the WHS and support its OUV. The monuments in the Brodgar-Stenness area were deliberately situated in the landscape and lie in a vast topographic bowl formed by a series of visually interconnecting ridgelines stretching from Hoy to Greeny Hill and back. They are also visually linked to other contemporary and later monuments around the lochs and form a fundamental part of a wider, highly complex archaeological landscape which stretches over much of Orkney.

Part of this wider landscape is thus included within a two-part Buffer Zone, one part centred on Skara Brae and the other on the central west Mainland monuments. Large-scale or tall development outwith the Buffer Zone also has the potential to impact adversely on the sensitive setting of the WHS. To address this, a wider, indicative, ‘Sensitive Area’ has also been defined. See map at Appendix 2.

2.4. The setting⁸

Geographically-speaking, the WHS is composed of two groups of monuments: the Brodgar–Stenness group and, approximately 5 ½ miles to the north-west, Skara Brae (See maps at Appendix 3). Each of these groups has quite a distinct setting.

The Brodgar-Stenness area of the WHS has a highly distinctive and important setting. Its geographic location and its relationship with the wider topographic landscape is a fundamental aspect of its setting. These features help define the modern experience of the site and seem to have been inextricably linked to the reasons for its development and use in prehistory.

In terms of the modern experience of place, the strongly rural character of the landscape around the monuments is important to their setting, as is the changing and often dramatic weather. The Ring of Brodgar feels far more isolated and separate than Maeshowe or the Stones of Stenness and this sense of isolation is vital to that monument. Relationships with

⁶ Historic Environment Scotland [Heart of Neolithic Orkney Inscription and Significance](#)

⁷ Historic Environment Scotland, Orkney Islands Council, Royal Society for the Protection of Birds, Scottish Natural Heritage (2016) [The Heart of Neolithic Orkney World Heritage Site Management Plan 2014-2019](#)

⁸ Atkins (2008) [The Heart of Neolithic Orkney World Heritage Site Setting Project](#)

the wider archaeological landscapes are also important both for modern visitors and in terms of understanding the function and significance of the WHS. Key relationships include the views to and from monuments around the shores of the lochs, e.g. the Knowe of Unstan; the visual relationships between the monuments in and around the WHS and the backdrops to those views; and wider views from the distant barrow groups. Finally, the alignment of the midwinter sunset at Maeshowe is an integral part of the WHS and its setting.

Skara Brae is geographically separate from the other parts of the WHS and is also typologically different as it is a domestic rather than ceremonial site – it therefore has a different setting. Its setting is far more about the modern experience of place rather than the physical manifestation of past relationships. This is characterised by the well-defined ridgelines and higher ground that define the edges of the visual envelope around the site; the working pastoral landscape around the site; the sensory experience of the site and, in particular, its relationship with the sea; and the small number of visual links to other archaeological monuments in the wider landscape.

2.5. Other historic and natural heritage designations

2.5.1. Relationship with WHS

The Brodgar-Stenness area is one of the most sensitive landscapes in Scotland, with multiple other historic and natural heritage designations in place to protect special features and characteristics, all of which contribute to the WHS' OUV. However, none of these designations were accorded with the intention of providing a policy framework for the protection and management of the WHS and its setting. Rather, they were defined to meet specific statutory purposes over areas delineated according to specific criteria or guidelines unrelated to the WHS⁹.

2.5.2. Brodgar Rural Conservation Area

Designated under the Planning Listed Buildings and Conservation Areas (Scotland) Act 1997, Conservation Areas have special architectural or historic interest that are considered worthy of protection. It is the character of an area, either architectural or historic, created by buildings and open spaces and their relationship with one another which the designation of a conservation area seeks to preserve¹⁰.

The Brodgar Rural Conservation Area is in the West Mainland and was designated (pre-WHS inscription) to conserve Orkney's Neolithic heartland, an important complex of fourth to second millennium BC monuments. It encompasses the Ness of Brodgar, a peninsula between the Lochs of Harray and Stenness, as well as part of the south western shores of the two lochs.

The archaeology of this area is of an exceptionally high standard. In addition to the well-known stone circles and groups of barrows, there are less visually prominent areas within which archaeological remains of considerable complexity and value can be expected to survive (see Table 1 in section 2.5.3). Moreover, the archaeology features punctuate a unique and evocative landscape that arises from the dramatic interplay of land and water.

⁹ Atkins (2008) [The Heart of Neolithic Orkney World Heritage Site Setting Project](#)

¹⁰ Historic Environment Scotland (2019) [Interim Guidance on the Designation of Conservation Areas and Conservation Area Consent](#)

2.5.3. Scheduled monuments

Scheduling is the process that identifies, designates and provides statutory protection for monuments and archaeological sites of national importance as set out in the Ancient Monuments and Archaeological Areas Act 1979. For a monument to be considered of national importance it must have a particular cultural significance which relates to its artistic, archaeological, architectural, historic, traditional, aesthetic, scientific or social interest. The aim of scheduling is to preserve sites and monuments as far as possible in the form they are today.¹¹

Designated in 1882, Maeshowe, Ring of Brodgar and Stones Stenness were among the first places to be protected as sites of historical significance in the British Isles. Skara Brae (settlement, mounds and other remains) was designated in 1928.

There are several scheduled monuments within the boundaries of the Brodgar Rural Conservation Area¹² as set out in Table 1. There are also a significant number of other scheduled monuments outwith the Brodgar Rural Conservation Area that contribute to the OUV of the WHS and have settings that are protected in the planning system in their own right.

Table 1. Scheduled monuments in the Brodgar Rural Conservation Area

Description	Designated
Ring of Brodgar, stone circle, henge and nearby remains	1882
Stenness, stone circle and henge	1882
Maes Howe, chambered cairn	1882
Barnhouse Stone, standing stone	1938
Bookan, chambered cairn	1938
Skae Frue, mound	1938
Lochview, standing stones and cairn	1998
Wasbister, burial mounds and settlement	1998
Wasbister, mounds	1998
Watch Stone, stone settings, Barnhouse settlement, and related remains	1999
Big Howe, broch	2014
Ring of Bookan, chambered cairn	2014

2.5.4. Loch of Stenness Special Area of Conservation¹³ (SAC)

Designated in Scotland under the Conservation (Natural Habitats &c.) Regulations 1994 (as amended), SACs protect one or more special terrestrial or marine habitats and/or species considered to be the most in need of conservation at a European level (excluding birds).

¹¹ Historic Environment Scotland (2019) [Scotland's Scheduled Monuments](#)

¹² Historic Environment Scotland [Designations Map Search](#)

¹³ NatureScot [Loch of Stenness SAC](#)

Loch of Stenness has a single basin characteristic of coastal lagoons in Orkney and has features of both silled lagoons and lagoonal inlets. It is the largest brackish lagoon in the UK and is of particular importance on account of its large size, stability, reduced salinity regime and northern location.

2.5.5. Lochs of Harray and Stenness Site of Special Scientific Interest¹⁴ (SSSI)

Designated under the Nature Conservation (Scotland) Act 2004, SSSIs are areas of land that best represent natural heritage in terms of their flora, fauna, geology, geomorphology or a mixture of these natural features.

The Lochs of Harray and Stenness SSSI comprises the two largest inland lochs in Orkney, which are adjoined at the Bridge of Brodgar in the south-east of the site. The lochs are shallow and exhibit a range of salinities from close to seawater in parts of the Loch of Stenness, to freshwater across most of Loch of Harray. Loch of Stenness is the second largest saline lagoon in Britain and is important due to its size, stability, northern location and seasonally fluctuating salinity, and Loch of Harray is naturally nutrient rich (eutrophic) and supports a diverse range of flora and fauna.

The site is also notified for its nationally important bird (pochard, tufted duck, scaup and goldeneye) and invertebrate species (caddis fly *Ylodes reuteri* and the freshwater nerite snail *Theodoxus fluviatilis*).

2.5.6. Brodgar, Loch of Harray Local Nature Conservation Site¹⁵ (LNCS)

LNCS is a non-statutory designation given by local authorities to areas of locally important nature and landscapes.

The Brodgar, Loch of Harray LNCS extends c.24 hectares and includes the Ring of Brodgar, a strip of land along the shore of the Harray Loch, and some marshy grassland with pools to the north of the Ring. Within the fenced area including the Ring are natural grassland and a patch of heather moorland within the Ring itself. The natural grassland is flowery, with much bird's foot trefoil, orchids and yellow rattle. The strip of land between Harray Loch and the public road also contains some heather moorland, but the main habitat is marshy grassland dominated by tall plants and grasses, especially meadowsweet. Amongst this is a large patch of holy grass*, a rare plant in the British Isles. The various mounds and cairns are grass-covered and rich in flowers (such as the common twayblade, an orchid) attract the Great Yellow bumble bee* and Moss carder bee*.

The site is important for breeding waders, including oystercatcher, lapwing*, snipe, curlew* and redshank all breed here in good numbers, also dunlin* in smaller numbers. There is a black-headed gull colony*. A variety of small birds nest here as well, including skylark*, meadow pipit, pied wagtail, stonechat, sedge warbler and reed bunting*. **nationally important species*

¹⁴ NatureScot [Lochs of Harray and Stenness SSSI](#)

¹⁵ Orkney Islands Council [LNCS Site Statements](#)

2.5.7. Hoy and West Mainland National Scenic Area^{16,17} (NSA)

NSAs are Scotland's only national landscape designation and defined as areas “of outstanding scenic value in a national context” for which special protection measures are required. The designation’s purpose is both to identify the finest scenery and to ensure its protection from inappropriate development.

The special qualities of the Hoy and West Mainland NSA include:

- A palimpsest of geology, topography, archaeology and land use
- An archaeological landscape of WHS
- The spectacular coastal scenery
- Sandstone and flagstone as an essence of Orkney
- A long-settled and productive land and sea
- The contrast between the fertile farmland and the unimproved moorland
- A landscape of contrasting curves and lines
- Land and water in constantly changing combinations under the open sky
- The high hills of Hoy
- The townscape of Stromness, its setting and its link with the sea
- The traditional buildings and crofting patterns of Rackwick

2.5.8. Protected species

Protected bird and other species can be found in the Brodgar-Stenness WHS area.

Birds¹⁸

All wild birds in the UK are protected under the Wildlife and Countryside Act 1981 (as amended). Further protection is given to some rarer, threatened or vulnerable species, for instance against disturbance during the breeding season.

The Lochs of Harray and Stenness play host to a range of wildfowl, including ducks, swans and grebes. Also, located between the lochs and bordering the Ring of Brodgar WHS, the Brodgar Royal Society for the Protection of Birds (RSPB) reserve¹⁹ provides a refuge for wildlife such as Curlews, Drumming Snipe, Lapwings, Golden Plovers, Dunlins, Redshanks, Oystercatchers, Skylarks and Great Yellow Bumblebees (depending on the season).

¹⁶ Orkney Islands Council [Hoy and West Mainland NSA map, description and special qualities](#)

¹⁷ NatureScot [Hoy and West Mainland NSA](#)

¹⁸ NatureScot [Protected species: birds](#)

¹⁹ Royal Society for the Protection of Birds [Brodgar Reserve](#)

Otters²⁰

As a European protected species, otters are fully protected under the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended). The Lochs of Harray and Stenness are well-known Eurasian otter (*Lutra lutra*) habitats.

2.6. Protecting the WHS

2.6.1. Planning and WHS designation

World Heritage designation does not result in additional direct legal protections. Instead, the WHS is protected through the planning system and designation of the components of the WHS as scheduled monuments.

2.6.2. The Historic Environment Policy for Scotland (HEPS) (2019)

The HEPS sets out a series of principles and policies for the recognition, care, and sustainable management of the historic environment.

2.6.3. Scotland's National Planning Framework 4 (NPF4) (2023)

NPF4 requires that planning authorities support development proposals only where the OUV of a WHS or its setting is protected and preserved. Scheduled monuments are covered by the Scheduled Monuments Consents Policy and they and their settings are also protected under NPF4.

2.6.4. Managing Change in the Historic Environment guidance notes²¹

Produced by HES, the notes provide non-statutory guidance about managing change in the historic environment. Each Managing Change guidance note looks at a different theme in terms of the key issues that might arise, how best to deal with such issues, and the reasons behind our advice

The guidance note entitled *Managing Change in the Historic Environment: World Heritage* sets out the principles that apply to developments affecting World Heritage Sites, and the roles and responsibilities that organisations have to care for and protect these Sites. It should inform planning policies and help with decisions relating to planning applications affecting Sites.

2.6.5. Orkney Local Development Plan (LDP) 2017-2022 and supplementary guidance

The LDP establishes the main principles of the policy to protect the WHS and its setting from inappropriate development.

Further guidance is provided in the Council's *Supplementary Guidance: Historic Environment and Cultural Heritage* (2017) which is a material consideration in the planning process. This guidance includes the wider setting of the WHS, which is critically significant to the OUV.

²⁰ NatureScot [Protected species: otters](#)

²¹ Historic Environment Scotland (2016) [Managing Change in the Historic Environment: World Heritage Sites](#)

With its numerous natural heritage designations, development in the Brodgar-Stenness area is also subject to the provisions of LDP *Policy 9 Natural Heritage & Landscape* and *Supplementary Guidance: Natural Environment* (2017). Together, these instruments seek to protect Orkney's natural environment from the detrimental effects of development, ensuring the conservation of this rich natural heritage for the benefit of future generations.

Development of a new ten-year LDP and guidance is underway.

2.7. Risks to the WHS

2.7.1. Climate change²²

UNESCO recognises climate change as one of the most significant and increasing threats to World Heritage Sites worldwide and to their potential for contributing to economic and social development at the local level.

HES published a baseline Climate Change Risk Assessment in 2017 for all Scotland's Properties in Care (PICs), including the HONO monuments. In 2019 a Climate Vulnerability Index assessment for World Heritage was carried out. This assessment identified that the WHS is extremely vulnerable to the impacts of three key climate drivers: sea level change, precipitation change, and storm intensity and frequency and that there is potential for major loss or substantial alteration to the OUV by 2050. The process also identified that air temperature change was likely to be an important driver of change in the future.

At the Ring of Brodgar increased footfall combined with changes in precipitation patterns, both increased precipitation and changes to patterns of rainfall, but also periods of very dry weather have led to serious and increasing footfall erosion in recent years. This threatens the fabric of the site and degrades the experience for all visitors. Over the last few years an extensive programme of works to create more resilient surfaces has been needed, but eventually periodic closures of parts of the site have been necessary.

In the past, the Stones of Stenness have proved more resilient, but climate impacts combined with changes in visitation patterns could potentially see increased footfall pressure cause similar issues.

At Maeshowe monitoring reveals that the Viking runic inscriptions on the interior stonework appears stable. However, there are potential impacts to the structure of the monument from changes to wetting/drying cycles and groundwater flooding that are not well understood at present.

At Skara Brae coastal erosion and sea level rise remain the predominant threat to the survival of the site in the longer term. This is being addressed in the short and medium-term by periodic monitoring and ongoing sea wall maintenance and repair, but in the longer term the threat will increase. There is also clear evidence of extensive further archaeological remains beyond the site as it is visible today, and these are also at risk. Finally, there is some potential for a single extreme coastal weather event to seriously damage the site.

²² Historic Environment Scotland and Orkney Islands Council draft Heart of Neolithic Orkney Management Plan 2023-2033

There may also be changes over time to the landscape of the Buffer Zone driven by changes to the climate. For example, loss of some species, increases in invasive species, changes to vegetation cover and changes to farming practice in response to climate factors could eventually alter local ecosystems/habitat and landscape and affect the sense of place. Changes to flora and fauna on the monuments themselves could also be damaging.

2.7.2. Other physical, intellectual and organisational risks²³

There are a range of other physical, intellectual, and organisational risks that affect the WHS and its OUV.

Physical risks include growing tourism numbers and issues around managing visitors to and around the WHS, potential impacts on setting from nearby development and incremental change. Climate impacts are increasingly likely to add to these compounding pressures.

Organisational risks include limited human resource, poor change management, lack of succession planning around key staffing, staff recruitment challenges, and the potential for economic uncertainty both locally and nationally.

Intellectual risks include a lack of public engagement and a lack of awareness or understanding of the WHS and Buffer Zone and their limits.

2.8. WHS management^{23,24}

2.8.1. WHS Management Plan

UNESCO Operational Guidelines²⁵ prescribe that each World Heritage Site should have an appropriate management plan which must specify how the OUV of a property should be preserved. The purpose of a management plan is to ensure the effective protection of the WHS for present and future generations. It directly informs HES' internal management decisions but does not influence or reflect HES' regulatory or planning functions.

The last iteration Orkney's WHS Management Plan covered the period 2014-2019. Development of a new ten-year management plan was delayed due to the pandemic and resource limitations but is now underway. Currently, a draft Management Plan and an action plan are circulating for partner comment.

It is important that the Management Plan objectives relate to wider plans and programmes that may affect the WHS. However, some of the issues affecting the WHS can only be adequately addressed at a strategic level for Orkney as a whole and cannot be resolved through the WHS Management Plan alone, though the Management Plan should influence, and be reflected in, the development of such strategies.

The Management Plan is not a statutory document and does not supersede the responsibilities of the individual partner organisations. However, for the Management Plan to be effective, the partner organisations should ensure that the Management Plan is reflected

²³ Historic Environment Scotland, Orkney Islands Council, Royal Society for the Protection of Birds, Scottish Natural Heritage (2016) [The Heart of Neolithic Orkney World Heritage Site Management Plan 2014-2019](#)

²⁴ Historic Environment Scotland and Orkney Islands Council draft Heart of Neolithic Orkney Management Plan 2023-2033

²⁵ UNESCO (2023) Operational Guidelines for the Implementation of the World Heritage Convention

in their own strategic and action plans as these are prepared, reviewed and implemented over the Management Plan period.

The Heart of Neolithic Orkney World Heritage Site Management Plan 2014-2019 is available [here](#).

2.8.2. Management Plan partners

The Council and HES are formal signatories to the Management Plan. The Signatory Partner organisations are those that formally ratify the WHS Management Plan and share accountability for ensuring that the Management Plan is delivered. It should be noted that while the Management Plan directly informs HES' internal management decisions, it does not influence or reflect HES' regulatory or planning functions.

Signatory Partners have specific responsibilities that flow from their organisations' remits, as outlined below.

The Council

The Council owns and maintains the car parks at Ring of Brodgar and Stones of Stenness, and the reconstructed Neolithic settlement at Barnhouse. The Council also maintains the local footpath network connecting the sites.

A collection of artefacts from Skara Brae is deposited in the Orkney Museum.

The Council is responsible for a diverse range of services which are relevant to the management of the WHS, including roads and public transport, education, economic development, heritage and recreation, development management and coastal protection.

The County Archaeologist maintains the Sites and Monuments Record for Orkney and provides archaeological advice in relation to development control.

HES

HES directly manages the component parts of the WHS as PICs on behalf of Scottish Ministers. This includes caring for the physical condition of the sites, managing visitors at the staffed and unstaffed sites, and providing interpretation and engagement. For reference, HES is responsible for 32 PICs across Orkney, including five which are staffed and for which admission is charged. The remaining sites are free to access.

HES funds a WHS Ranger Service, Visitor and Community staff, and a Monument Conservation Unit, all of whom contribute to the operation of the PICs. HES also employs a WHS Coordinator (further detail in section 2.8.3).

HES' Planning, Consents and Advice Service (PCAS) considers scheduled monument consent applications on behalf of Scottish Ministers, provides advice to local planning authorities on listed building and conservation area consent applications, scheduled monuments and their settings and proposals affecting World Heritage Sites and their OUV, and planning applications, and is also a consultee, through Scottish Government, on Environmental Impact Assessments and Strategic Environmental Assessments.

Advisory Partners organisations include the University of the Highlands and Islands (UHI) Archaeology Institute, HIE, NatureScot and RSPB. They do not formally ratify the Management Plan but have important roles in supporting and advising on its development and delivery where it intersects with their remits.

2.8.3. Steering Group

A Steering Group meets regularly to give strategic direction and oversight to development and is accountable for delivery of the Management Plan. The Steering Group comprises representatives of the Council, HES (as site owner and manager, not as regulator or planning consultee), UHI Archaeology Institute, HIE, NatureScot and RSPB.

The Steering Group also approves programmes and strategies proposed by management sub-groups, monitors progress of the Action Plan and keeps both the Objectives and the overall Plan under review. It provides a forum to draw on and share the members' range of experience and expertise. The members are also the links between the Steering Group and their organisations and their relevant departments.

The Steering Group is supported by a WHS Coordinator to help ensure effective coordination between the Partners and to enable the implementation, monitoring and revision of the Management Plan and its Objectives. The Coordinator also promotes awareness and understanding of the OUV and public benefit of WHS, and the value of World Heritage status more widely, to partners, stakeholders and the public, and serves as a central point for information and advice about the WHS.

3. Context and Challenges

3.1. Orkney Tourism

3.1.4. Value and volume

Sustainable tourism is a key growth sector identified in the Scottish Government's Economic Strategy and is one of the most important drivers of the Orkney economy. According to the annual Scottish Tourism Economic Activity Monitor (STEAM) report commissioned by the Council, it is estimated that in 2022 there were over 183,000 leisure and business visitors and more than 136,000 day visitors, including cruise passengers, who generated £87 million in expenditure for the local economy. Considering estimated pre-pandemic expenditure of £95 million in 2019, the value generated in 2022 indicates that Orkney tourism is on course to recovery.

3.1.5. Cruise tourism

One of the most notable trends of the past decade is the growth of the cruise sector within which Orkney has successfully positioned itself as a premier destination. Following a pause due to the pandemic, cruise's growth trajectory resumed, with passenger arrivals to Orkney increasing beyond pre-pandemic levels. This is evidenced by increases from 132,388 cruise visitors in 2019 to 204,606 in 2023 and circa 250,000 estimated for 2024.

3.1.6. Core offer

For decades, the WHS has formed the centrepiece of Orkney's tourism offer, with images of Skara Brae, Maeshowe, Ring of Brodgar and Stones of Stenness adorning brochures and websites around the world. This unique prehistoric landscape also holds great importance for local people, forming a central component of Orcadian culture, history, and heritage. Every first-time visitor to Orkney makes a pilgrimage to the WHS and their experience of it shapes their entire understanding of Orkney, Scotland, and the Neolithic period globally. Survey after survey has identified the Islands' natural and cultural heritage as the leading reason for visitation and the WHS has been a critical driver in the growth of tourism in Orkney and the cruise sector, in particular²⁶.

3.1.7. Cruise ship shore excursions

Cruise lines are commercial businesses and, accordingly, potential shore excursion (shorex) revenues and port costs are fundamental considerations when selecting ports of call. While significant, operational factors such as port facilities and services are secondary. In other words, the success of Orkney's cruise sector is dependent on the shorex offer.

The WHS is prominent in most, if not all, cruise ship shorex programmes (i.e., portfolio of tours sold by cruise lines to their passengers) and independent shorex (i.e., tours sold by private tour operators directly to cruise passengers, in competition with the ships' shorex). The standard West Mainland tour and panoramic sightseeing tours are among the most popular. The West Mainland tour of approximately 3½ to 4 hours, which typically features a guided tour of Skara Brae and Skail House and the Ring of Brodgar, and a photo stop at the

²⁶ Orkney Islands Council, Historic Environment Scotland and Highlands and Islands Enterprise (2022) Orkney World Heritage Site Gateway Programme Outline Business Case

Stones of Stenness. There are any number of different panoramic itineraries of varying durations from 2 to 4 hours, featuring (among other things) a drive past and/or photo stop at the Ring of Brodgar or Stones of Stenness.

3.2. The problem

25 years ago, a report²⁷ investigating options for traffic and visitor management in the Brodgar Rural Conservation Area (pre-World Heritage inscription) and at Ring of Brodgar, in particular, clearly stated the problem:

The WHS attracts more visitors than it can sustainably accommodate.

The report highlighted that the majority of tourists visit the WHS and concluded that “clearly the present situation is unsustainable”. However, few of the recommendations were taken forward and, of those that were, complementary visitor management measures were either not implemented or insufficient to mitigate adverse impacts (see sections 3.4.1 and 3.4.2, for example) of surging visitor numbers.

For reference, at the time of the report there were around 100,000 overnight visitors to Orkney and the cruise sector was in its infancy, with estimated passenger numbers well below 10,000. Over the ensuing 20 years, total visitors to Orkney increased to almost 325,000 (2019) and are expected to exceed 425,000 in 2024.

3.3. Tourism impacts

The combination of unrestrained tourism growth and unmanaged visitor footfall have had detrimental impacts on the WHS’ natural and cultural heritage as well as the community and visitor’s safety and wellbeing. In the Brodgar-Stenness area and at the Ring of Brodgar, in particular, the following concerns persist:

- damage to the monuments
- wear on the fragile vegetation and underlying archaeology by visitor footfall
- climate change impacts from precipitation change and storm intensity and frequency, exacerbated by increased footfall
- overcrowding at the sites and in their car parks
- compromised road safety and deteriorating road structures due to increasing traffic volume on the single track B9055 during peak season
- visual intrusion of coaches upon the monuments and wider landscape
- environmental health risk due to undesirable toileting behaviour and (anecdotal) irresponsible campervan cassette toilet waste disposal

²⁷ Ironside Ferrar Ltd (1998) Brodgar Visitor Management Plan

3.4. WHS visitor facilities and management

3.4.1. Ring of Brodgar

There were **approximately 174,000²⁸** visitors to Ring of Brodgar in 2023. Access to the monument is free of charge and open 24 hours a day year-round.

HES manages visitors by minimising negative impacts on the monument and enhancing the experience of the WHS. There has been considerable investment in repairing the inner ring network which was eroded by increasing footfall over many years. With visitor numbers continuing to grow and responding first and foremost to the conservation needs of the monument, access to the inner path has been restricted and alternating routes around the Ring provided to allow paths to rest and regenerate. During the summer months, WHS Rangers are onsite to provide visitor information. A free guided walk is available throughout the year (daily May-September and weekly October-April). The Council is responsible for the car park across the road from the monument but does not actively manage it. Parking is free of charge and access is open 24 hours a day year-round. There are 18 car spaces (plus informal parking) – spaces are not demarcated in approximately a third of the car parking area, 4 disabled spaces, 4 motorcycle spaces, 10 cycle racks, and space for 4-5 coaches. There are also 2 disabled laybys for up to 4 cars next to the monument.

In 2006, the Brodgar car park was relocated to relieve pedestrian safety concerns and the visual intrusion of coaches upon the monument and wider landscape. However, the new car park with coach parking attracted greater visitor numbers to the monument and along the road, introducing new pedestrian safety concerns and greater footfall impacts on the monument, which have become increasingly acute as tourism continues to grow.

Today, the car park is often full during the season, with periodic overflow on the B9055 observed on busy cruise days. High volumes of visitors combined with a lack of facilities, has resulted in undesirable toileting behaviour by visitors (both independent visitors and coach passengers have been observed) behind the bunding next to the car park. Campervans are parked overnight year-round, although their volume is greater during the summer months, and there is anecdotal evidence of cassette toilet waste being emptied behind the bunding.

3.4.2. Stones of Stenness

There were **approximately 76,000²⁸** visitors to the Stones of Stenness in 2023. Access to the monument is free of charge and open 24 hours a day year-round.

HES manages visitors by enhancing their experience of the WHS with free guided walk by the WHS Ranger offered throughout the year (daily May-September and weekly October-April).

The Council is responsible for the car park next to the monument but does not actively manage it. Parking is free of charge and access is open 24 hours a day year-round. There is space for 8 cars and 2 coaches.

In 2021, a new car park was opened in the location of the former layby. This rationalised car parking and relieved concerns about vehicular damage caused by large potholes in the layby.

²⁸ Data from footfall counters

However, it did not increase capacity and consequently, the car park is often full, with periodic overflow on the B9055 observed on busy cruise days. The new car park also did not address the visual intrusion of coaches upon the monument and wider landscape or relieve concerns about pedestrian safety when crossing the 60 mph B9055 to view wildlife on the Loch of Stenness. Furthermore, the improved access to the WHS provided by the new car park has increased the risk of footfall damage to the monument as tourism growth continues.

3.4.3. Maeshowe

In 2023, there were **just over 15,000** visitors to Maeshowe. Admission is charged for a guided tour and transfer to and from the monument. Hourly tours are offered daily year-round (April-September 10:00-17:00 and October-March 10:00-16:00). Twilight tours are also available in the summer (June-August at 18:00, 19:00 and 20:00). Due to limited tour capacity, booking online in advance is encouraged.

HES manages visitors by minimising negative impacts on the monument and enhancing the experience of the WHS. Access to the monument is by guided tour only, for a maximum of 16 people. Visitors must check in at the visitor centre in Stenness and then transfer by shuttle to Tormiston Mill. Stopping is not permitted and parking is not available and any closer to the monument than the visitor centre. Furthermore, HES has been working with partners, including the Council, to mitigate concerns around vehicle and pedestrian movement around Tormiston Mill in response to a road traffic audit.

Coach tours are accommodated by dividing visitors into groups of 16 people maximum. Some tours alternate visits to Ring of Brodgar and Stones of Stenness while smaller groups visit Maeshowe. On occasion, tours have been truncated to accommodate multiple small groups within a 1-hour time slot.

Booking online in advance is encouraged as tours are typically fully booked about a week in advance during peak season. Most visitors who book in advance can secure their preferred tour time, but visitors arriving on the day can rarely be accommodated.

3.5. OWHSG Programme²⁹

3.5.1. Purpose

The OWHSG Programme seeks to provide a world-class, innovative solution to heritage management and sustainable tourism at the WHS, enabling exceptional engagement with and connection to the sites and their history for visitors and residents, and protecting the outstanding value of the heritage for generations to come.

3.5.2. Background

Recognising the serious risks to the WHS and its setting, and in line with the government's obligations under the terms of the 1972 UNESCO Convention to do all that it can and, to the utmost of its resources, to protect, conserve, present and transmit the OUV of the WHS to future generations, the Council, HES (as site owner and manager, not as regulator or planning consultee) and HIE partnered in 2018 to explore initial options for revolutionising the

²⁹ Orkney Islands Council, Historic Environment Scotland and Highlands and Islands Enterprise (2022) Orkney World Heritage Site Gateway Programme Outline Business Case

visitor experience while safeguarding the WHS. The full scope of potential heritage and environmental impacts were not investigated as part of this process.

During 2018 and 2019 a broad way forward was identified, founded on an agreed Memorandum of Understanding between the partners. This was then developed further to reflect changing priorities and needs as the COVID-19 pandemic sideswiped the tourism industry across the UK and in Orkney. Throughout the latter half of 2020, 2021 and into 2022 the partners continued to develop the proposals for the WHS considering shifting priorities in the tourism market and recognising the inherent fragility of the WHS and its surrounding landscape, and its vulnerability to change from high levels of visitor footfall, coastal erosion, and other risks. The partners, wider tourism industry, and residents and businesses all recognise that the current state of the WHS is untenable. The visitor experience is compromised at present by overcrowding and brief visits with limited engagement and needs to be greatly improved.

Central to the development and reshaping of the programme has been the shift in emphasis in Orkney away from mass tourism that fails to enrich visitors, causes conflict with residents, and limits the economic impact of visits and towards a sustainable tourism offer that provides a high quality, low impact experience that resonates with key identified markets most likely to return to Orkney. These visitors seek life-enriching, knowledge-filled, and authentic experiences – something the WHS as it stands is not able to provide.

This sustainable approach to tourism development also enables the Partners to prioritise and support the experience and quality of life of residents, ensuring an improved experience for Islanders, deepening their engagement with their heritage, and ensuring year-round enjoyment and access to the monuments. By reducing some of the negative impacts of mass tourism in Orkney, the benefits of visitors can be felt by a larger number of people, while also ensuring visitors have an unforgettable experience on the islands.

3.5.3. Strategic priorities

In developing the OWHSG programme's Strategic Outline Case, a detailed strategic policy review was undertaken. Several thematic priorities emerged repeatedly from the 33 strategies reviewed, including:

- natural and cultural heritage preservation
- sustainable tourism
- climate action
- community wellbeing
- inclusion and accessibility
- learning and knowledge
- technological innovation
- mental, physical, and spiritual health

3.5.4. Programme elements

The OWHSG Programme was developed to provide a complete and fundamental reimagination of the visitor experience across the whole of the WHS that will meet the needs

and aspirations of local communities and key target markets, while safeguarding and protecting the WHS. It will create a world-leading sustainable tourism offer by:

- Ensuring the monuments and surrounding landscapes are protected and kept in good condition by utilising new, innovative approaches to the management of the WHS in terms of visitor orientation, volume management, and technology-enabled guidance
- Creating a new gateway to the Brodgar-Stenness area as the foundation of a sustainable low-impact sustainable tourism experience that will see traffic removed and visitors exploring the site on foot, by bike and by zero emissions transport
- Transforming the visitor facilities at Skara Brae to provide an outstanding interpretative experience that tells the story of Skara Brae and beyond, delivers a new streamlined and focused trade guest experience and upgrades the overall centre to reflect its pivotal role in Orkney's tourism offer
- Delivering Islands-wide visitor information and management applications to disperse visitors and manage overcrowding in the peak season.

Details of key project elements are set out in Appendix 4.

Alongside OWHSG Programme interventions, the Council and its partners are prioritising investment in other places and attractions across the Islands, through the development and delivery of a Strategic Tourism Infrastructure Development Plan (STIDP).

3.5.5. Funding detail

Completed at the end of 2022, the Outline Business Case specified estimated capital development costs for the programme of £11.93 million (excluding VAT). This estimate included professional fees (at 25%), contingency (at 20%), and inflation to Q1 2025. Any additional inflationary expenditure incurred would form part of the fundraising target for the project.

In addition, £200,000 of revenue funding required to support project management will be funded separately, bringing the total project cost to c.£12.13 million.

£6.5 million of Islands Growth Deal funding from the Scottish and UK Governments has been allocated to the Programme. The remaining funding requirement will be raised separately by the partners through a combination of their own resources and an active programme of fundraising.

3.5.6. Status and next steps

Recruitment of a Programme Manager (a 3-year post jointly funded by the Council and HES) to progress the Full Business Case (FBC) is currently underway.

Feasibility and design will be undertaken as part of the process of developing the FBC. It will then be possible to (among other things) provide updated project costs and confirm delivery timetable for the various projects and detail any new operational arrangements.

4. Proposed Solutions

4.1. Visitor management approaches³⁰

Effective visitor management is an essential strategy for protecting sites and the environment in which they sit and managing impacts.

A common approach to minimising adverse impacts is facility development and site hardening. However, while such improvements provide benefits, they typically attract more visitors who, in turn, cause further damage. This is what occurred following the construction of the new Brodgar car park in 2006. Unmanaged coach parking was provided free of charge and, consequently, as tourism growth surged, so did visitor numbers and impacts on the monument and its setting.

It has been clear for some time that more robust visitor management measures are required across the WHS. These can not only minimise and mitigate visitor impacts but also improve the visitor experience and realise sustainability outcomes for the community. Achieving this will require a combination of measures, including:

- (1) Limiting visitor numbers to match capacity
Note: This involves first determining the carrying capacity of the site, including levels at which physical and irreversible damage occurs, and the local community suffers unacceptable side effects.
- (2) Adapting the resource to sustain visitation and minimise impacts
For example, reinforcement of footpaths, prevention of access to part of a site to allow re-growth, construction of a replica, and provision of rangers or guides.
- (3) Modifying visitor behaviour
For example, through marketing and promotion, information provision, promotion to attract visitors out of season and to disperse to complementary sites, use of signs, codes of conduct and interpretation.

HES already employs such interventions to manage the WHS monuments for which they are responsible (for details, see sections 3.4.1, 3.4.2 and 3.4.3). However, measures cannot be fully effective in preserving cultural heritage and the visitor experience at Ring of Brodgar and Stones of Stenness (unstaffed sites) if access to the monuments continues to be unlimited and unmanaged as tourism growth continues. As set out in section 3.5, the OWHSG Programme aims to address this and other visitor management challenges affecting the WHS.

4.2. Development and selection of options

4.2.1. Information sources

Given the limited time to undertake this options appraisal, in-depth and wide stakeholder consultation has not been possible. Consequently, development and selection of options have been informed by the following:

³⁰ Mason, P. (2005) Visitor management in protected areas: from 'hard' to 'soft approaches? *Current Issues in Tourism*, 8(2-3), pp.181-194.

- Consultation with officers from various Council services and partner organisations (see section 1.3)
- WHS Management Plan ([2014-2019](#) and draft 2023-2033)
- WHS Strategic Masterplan (2019-2029)
- [Climate Risk Assessment for the WHS](#) (2019)
- [Community View: WHS](#) (2020)
- Extensive research undertaken in relation to the OWHSG Programme since 2018 and related reports, including:
 - Orkney Gateway Report (2018)
 - Strategic Outline Case (2020)
 - Public consultation results (2021)
 - Outline Business Case (2022), including updated Strategic Policy Review
- [The Heart of Neolithic Orkney World Heritage Site Setting Project](#) (2008)
- Brodgar Visitor Management Plan (1998)
- Historic related stakeholder engagement and initiatives
- Other independent research

4.2.2. Guiding principles

The following principles guided the selection of short-listed options set out in section 4.4:

- The imperative to protect the WHS and its setting and OUV outweighs tourism interests. This recognises that without the WHS monuments and other historic environment assets, many of which are related to the WHS and its setting and OUV, there is no related visitor experience.
- All tourism impacts the WHS. While volume undeniably affects the monuments and their setting, solutions must focus on collective management of visitors rather than on management of a particular visitor segment.
- Multiple measures are required to effectively address tourism issues impacting the WHS and its setting. There is no single easy solution to the complex problem.
- All interventions must comply with the provisions of HEPS, NPF4 and other policies and guidance (see section 2.6).
- Community views must be considered. The WHS and its setting are significant to community wellbeing and residents' sense of place.

4.2.3. Community views

In October 2021, public consultation was undertaken on the OWHSG Programme's proposed components and visitor management measures. Two in-person events were held, and an online survey was deployed. The survey revealed:

- 65% agreed that toilets and improved visitor facilities are needed at Ring of Brodgar. 24% disagreed and 11% neither agreed nor disagreed. (sample 127)

- 87% agreed that coach traffic in the WHS should be better managed, with a limited number of coaches permitted at any one time or on any one day. 7% disagreed and 7% neither agreed nor disagreed. (sample 127)
- 49% agreed that parking charges, with local exemptions, would encourage carbon reduction and would be appropriate in supporting the care and maintenance of the WHS, whilst allowing free pedestrian access. 42% disagreed and 9% neither agreed nor disagreed. (sample 125)
- 59% agreed that additional physical and digital orientation, wayfinding and interpretation would improve the WHS visitor experience, increase dwell time and encourage exploration. 16% disagreed and 25% neither agreed nor disagreed. (sample 128)
- 60% agreed that new or improved facilities are required in the WHS to provide better orientation, interpretation, parking, toilets, and other facilities. 22% disagreed and 17% neither agreed nor disagreed. (sample 129)

4.3. Discarded options

4.3.1. Install toilets on coaches

There are currently no functioning onboard toilets in the Orkney-based fleet of coaches. While vehicles may have cubicles, these are used for storage of cleaning supplies.

More than a decade ago, the main local operator who supplies the majority of coaches for shorex took the decision to not provide onboard toilet facilities because:

- (1) appropriate waste disposal facilities were not available in Orkney;
- (2) there are safety and related liability concerns with passengers using toilets while coaches are travelling, particularly on Orkney's winding, single track roads; and
- (3) coach drivers do not want to clean toilets and, given the chronic driver shortage (exasperated by the pandemic), they are loath to add toilet cleaning to drivers' responsibilities as this would adversely affect driver retention. Primarily a consequence of tourism seasonality, the coach driver shortage is a significant issue which should not be underestimated as it directly affects the coach operator's ability to function.

An off-island coach operator with coaches seasonally based in Orkney advised that they lock their functioning onboard toilets due to the absence of waste disposal facilities. The operator allocates very few coaches to shorex, preferring to focus on private tours and other non-cruise tours. These itineraries typically include frequent toilet stops and, therefore, onboard toilets are not a necessity. However, the operator indicated that if coach waste disposal facilities were available, they would consider opening their onboard toilets.

It should be noted that, while visitors travelling onboard coaches represent volume which can adversely impact sites, undesirable toileting behaviour by independent visitors has also been observed. Furthermore, there have been reports of campervan cassette toilet waste being emptied next to the Brodgar car park and elsewhere in the countryside.

Considering that investment in and managing toilets onboard coaches is a commercial matter for individual operators and that regulating and/or providing financial support for this would

neither be viable nor resolve the issue of undesirable toileting behaviour, this option was discarded.

4.3.2. Direct volume traffic to toilets in Stenness village

Toilets are currently available approximately 2 miles away from the Ring of Brodgar on the Ireland Road in Stenness village. These comprise 2 accessible toilets in the Maeshowe Visitor Centre and a single-cubicle public toilet along the road, just outside the visitor centre car park. While both facilities are arguably sufficient for independent visitors to the area, they are insufficient to accommodate a continual flow of volume visitors.

The visitor centre's car parking capacity is only sufficient to accommodate current Maeshowe tour demand. However, there are some coach visits booked at Maeshowe, but those vehicles as well as larger motorhomes are unable to access the visitor centre car park. Feedback from some Stenness village residents reflects safety concerns over the increasing number of coaches and motorhomes parking on the Ireland Road while they visit Maeshowe during the summer season.

It should be noted that the visitor centre is not simply a location for ticketing and transfers to the monument. Sized in accordance with Maeshowe's limited capacity tour, its modest offer includes admissions and retail, self-service coffee and tea, a virtual reality exhibit and overview film, and a meeting/display room. It also acts as the base for the WHS Ranger Service and has staff welfare facilities.

Considering the limited toilet facilities, parking and road safety issues, and likely erosion of the Maeshowe visitor experience, directing volume traffic from the Brodgar car park to existing toilets facilities in Stenness village is not considered a viable option.

4.3.3. Open community halls

In collaboration with cruise ship shore excursion operators and the St Margaret's Hope and Birsay communities, the Council piloted a community halls opening scheme in summer 2018. The halls were selected as they were already on a popular shorex route, and a diversion was not necessary. The purpose was to provide toilet facilities for cruise visitors and determine what, if any, socio-economic value could be generated for local communities by opening the halls to visitors. The Council covered the cost of opening the Cromarty Hall and Birsay Community Hall, shorex operators provided a list of bookings (including estimated visitor numbers and time of arrival) for several dates, and the halls' volunteer staff arranged opening. In addition, the communities were encouraged to coordinate an offer for visitors and initial discussion with representatives generated a number of ideas from a simple leaflet display and the sale of bottled water to an honesty box with local treats or even an indoor market.

Ultimately, volunteers opened a café at the Cromarty Hall, offering takeaway coffee/tea and homebakes, and a second-hand bookstore. This was so well received by visitors that the openings continue today, with the nominal cost of the hall hire now included in the shorex price. Unfortunately, the Birsay Hall endeavour was not as successful. While it did open on some days, there was limited volunteer resource to coordinate openings and no resource to organise a community offer at the hall.

As part of this appraisal, the Sandwick Hall was examined as a potential option, but discarded for the following reasons:

- (1) It is located more than 4 miles (10 minutes) away from Ring of Brodgar and is not along a standard shorex route. Stopping at the hall would require a diversion of minimum 15 minutes on an already-tight itinerary and therefore, shorex operators are unlikely to consider the hall as a toilet stop.
- (2) Without a proven coordination service and consistent availability and opening of the hall, shorex operators are unlikely to consider it as a toilet stop. As demonstrated by the Cromarty Hall example, the cost to hire the hall is not a primary consideration, particularly when an enhanced visitor experience provides a competitive advantage for shorex operators.
- (3) Diverting volume visitors to the hall would increase two-way traffic on the single-track Vetquoy Road and also on the B9057 for coaches travelling between Skara Brae and the Stenness WHS area via the hall.

4.3.4. Develop other sites in Brodgar-Stenness area

Development of a new viewpoint in the Brodgar-Stenness area with toilet facilities could provide an opportunity for visitors to enjoy a brief stop for photos of the views and to avail much-needed toilet facilities. The establishment of a new attraction offering a wider perspective of the WHS and its setting could provide a destination for traffic displaced by the concurrent introduction of visitor management measures (e.g., capacity limitations and advance booking and fee payment requirements for coaches) at the Standing Stones and Ring of Brodgar car parks.

However, it should be considered that while a new viewpoint could provide tourism benefits, the addition of a new toilet block and car/coach parking into undeveloped key views from nearby WHS monuments is likely to have a significant negative impact on the setting and consequently, OUV of the WHS. Also, there are a number of scheduled monuments in the area (as detailed in section 2.5.3) with their own settings in addition to their relationship with the WHS. Development would almost certainly have a significant impact on the WHS monuments and setting and be contrary to policy.

A point of critical importance is that the Council does not currently own land for such a development. However, if there were a property considered for acquisition (and assuming the historic environment constraints could be resolved), engagement with not only the land owner but also neighbouring land owners and residents to understand the potential effects of a viewpoint development would be essential before progressing any land purchase. It would, however, be reasonable to assume that high volumes of vehicles stopping in proximity to their property could significantly disturb their enjoyment of it and the surrounding area, especially during the summer months.

This option has been discarded due to the land ownership constraint, the virtual certainty of adverse impacts on the WHS' OUV and neighbours, and the fact that it does not directly address the undesirable toileting behaviour in the Brodgar car park. It is believed that, as long as there are visitors to Ring of Brodgar and no toilet facilities available somewhere onsite, undesirable toileting behaviour will persist. The concurrent introduction of management measures in the Brodgar car park and toilet facilities at a new viewpoint could reduce instances, but it is unlikely to eliminate them altogether.

4.4. Short-listed options

4.4.1. Summary

Options		Soonest delivery*	Relative cost
Option 1 –	Do minimum	2024	£
Option 2 –	Site temporary toilets in the Brodgar car park	2025	££
Option 3 –	Install permanent toilets in the Brodgar car park	2027	£££

* *Subject to key considerations set out in section 5.*

4.4.2. Option 1 – Do minimum (seasonally from April 2024)

Component	Description	Impact of implementation
(a) Brodgar car park cleaning	Collect waste from behind the bunding in the car park on a monthly basis during the season (May to September). This is the current arrangement in place with a private contractor.	<ul style="list-style-type: none"> • Prevents build-up of waste and associated smell • Assumes undesirable toileting behaviour will continue, further polluting the environment, compromising human health, damaging the WHS' OUV and eroding the visitor experience and neighbours' enjoyment of their land and surrounding area
(b) Toilet access for cruise passengers at Hatston Pier	Arrange open access to toilets in the NorthLink Ferries terminal at Hatston Pier for cruise passengers while their ships are berthed. Toilets are currently only available to cruise visitors on an emergency basis.	<ul style="list-style-type: none"> • Improves the visitor experience • Promotes inclusion and preserves human health and dignity • Encourages and enables visitors to use the facilities before they depart on tour, helping to reduce undesirable toileting behaviour in the WHS and other countryside locations
(c) Wayfinding, orientation and responsible tourism information	<p>Provide new and improved wayfinding signage in the Brodgar car park and WHS orientation and responsible tourism information online. All physical interventions within the WHS area must be sensitively designed and sited.</p> <p><u>Ring of Brodgar</u></p> <p>(i) Add a visible toilet sign in the Brodgar car park, with a QR code to the public toilets map on Orkney.com and/or an arrow pointing to the nearest facilities. Further directional signage may be required in Stenness village. Note: this is unlikely to redirect coaches except in an emergency, as they followed tightly timed itineraries.</p>	<ul style="list-style-type: none"> • Improves visitor experience and neighbours' enjoyment of their land and surrounding area • Encourages responsible behaviour and dispersal across and beyond the WHS • Offers nominal promotion and marketing benefit • Promotes deeper engagement with natural and cultural heritage and appreciation for local communities

Component	Description	Impact of implementation
	<p><u>WHS and Beyond</u></p> <p>(ii) Link public toilets map on Orkney.com to Google Maps to provide directions and navigation to nearest toilets from current location.</p> <p>(iii) Add a responsible tourism webpage to Orkney.com, providing advice to visitors about how to visit the WHS and Orkney responsibly.</p> <p>(iv) Update entries for Ring of Brodgar, Standing Stones of Stenness and the WHS on partner websites, Orkney.com, Historicenvironment.scot and VisitScotland.com, to highlight the location of the nearest toilets (also link to the public toilets map on Orkney.com) and encourage specific responsible behaviour (also link to new responsible tourism page on Orkney.com).</p>	

4.4.3. Option 2 – Site temporary toilets in the Brodgar car park (*at the earliest, seasonally 2025-2027*)

Component	Description	Impact of implementation
(a) Seasonal temporary toilets	Site seasonal temporary toilets for a three-year period in a location appropriate to preserving the WHS' OUV and setting and protecting biodiversity in the area.	<ul style="list-style-type: none"> • Improves seasonal visitor experience and neighbours' enjoyment of their land and surrounding area • Preserves environmental and human health • Trials viability of toilet facilities onsite • Offers opportunity to generate revenue through toilet use charges to fund operational costs
(b) Traffic management infrastructure	Implement traffic management measures, including: <ul style="list-style-type: none"> (i) introducing voluntary or mandatory car parking charges (ii) piloting coach booking system and number plate recognition technology 	<ul style="list-style-type: none"> • Manages car park and monument capacity, reducing congestion at peak times • Disperses visitors to other attractions. However, could also displace traffic and volume-related issues to unmanaged sites

Component	Description	Impact of implementation
	<p>(iii) employing seasonal car park attendant(s) to manage coaches and car parking and clean toilets and a year-round part-time officer to manage online coach bookings and enquiries</p> <p>Visitor volume will be set in accordance with the physical capacity of the car park and informed by the ecological and socio-cultural capacity of the monument.</p> <p>Measures should be simultaneously introduced in Stones of Stenness car park to avoid the site being overwhelmed by traffic displaced by capacity limitations at Ring of Brodgar.</p>	<ul style="list-style-type: none"> • Facilitates resource planning • Conserves the WHS and improves the visitor experience • Informs feasibility of wider WHS visitor management approach proposed in the OWHSG Programme • Provides opportunity to generate revenue through car parking and coach booking charges to fund operation and maintenance costs • Promotes safety by preventing parking on single-track B9055 road
<p>(c) Wayfinding, orientation and responsible tourism information</p>	<p>Provide new and improved wayfinding signage in Brodgar car park and WHS orientation and responsible tourism information online. All physical interventions within the WHS area must be sensitively designed and sited.</p> <p><u>Ring of Brodgar</u></p> <p>(i) Add a visible toilet sign in the Brodgar car park, with a QR code to the public toilets map on Orkney.com and/or an arrow pointing to the nearby facilities. Further directional signage may be required in Stenness village.</p> <p><u>WHS and Beyond</u></p> <p>(ii) Immediately implement Option 1 (c)(ii), (iii) and (iv).</p> <p>(iii) Develop a new website for the WHS with a strong conservation focus. Acting as an online gateway, it would offer comprehensive orientation, interpretation and other resources for visitors, the community and other stakeholders.</p>	<ul style="list-style-type: none"> • Significantly improves visitor experience • Promotes deeper visitor and community engagement with natural and cultural heritage and understanding of WHS' OUV and the area's protected landscape and biodiversity features • Encourages responsible behaviour and dispersal across and beyond the WHS • Offers significant promotion and marketing benefit

4.4.4. Option 3 – Install permanent toilets in the Brodgar car park (*earliest 2027*)

Component	Description	Impact of implementation
(a) Permanent toilets	Install permanent toilets in a location appropriate to preserving the WHS' OUV and setting and protecting biodiversity in the area.	<ul style="list-style-type: none"> • Significantly improves visitor experience and neighbours' enjoyment of their land and surrounding area • Preserves environmental and human health • Offers opportunity to generate revenue through toilet use charges to fund operational and maintenance costs
(b) Refurbish car park	Rationalise car park to align with carrying capacity of the monument and anticipated use patterns, and to clearly demarcate all parking spaces and direct traffic flow	<ul style="list-style-type: none"> • Improves the visitor experience • Enhances car park safety • Ensures effective and efficient management of the car park • Optimises use of the space and [if voluntary or mandatory parking charges are introduced] revenue generating potential
(c) Traffic management infrastructure	<p>Implement traffic management measures, including:</p> <ul style="list-style-type: none"> (i) introducing voluntary or mandatory car parking charges (ii) piloting coach booking system (iii) installing automatic number plate recognition (ANPR) camera (iv) rolling out visitor information and management app (v) employing seasonal car park attendant(s) to manage coaches and car parking [during ANPR trial] and clean toilets and a year-round part-time officer to manage online coach bookings and enquiries <p>Visitor volume will be set in accordance with the physical capacity of the car park and informed by the ecological and socio-cultural capacity of the monument.</p>	<ul style="list-style-type: none"> • Manages car park and monument capacity, reducing congestion at peak times • Disperses visitors to other attractions. However, could also displace traffic and volume-related issues to unmanaged sites • Facilitates resource planning • Conserves the WHS and improves the visitor experience • Informs feasibility of wider WHS visitor management approach proposed in the OWHSG Programme • Provides opportunity to generate revenue through car parking and coach booking charges to fund operation and maintenance costs

Component	Description	Impact of implementation
	<p>Visitor management measures should be simultaneously introduced in Stones of Stenness car park to avoid the site being overwhelmed by traffic displaced by capacity limitations at Ring of Brodgar.</p>	<ul style="list-style-type: none"> • Promotes safety by preventing parking on single-track B9055 road
<p>(d) Wayfinding, orientation and responsible tourism information</p>	<p>Provide new and improved wayfinding signage in Brodgar car park and WHS orientation and responsible tourism information online.</p> <p><u>Ring of Brodgar</u></p> <p>(i) Add a visible toilet sign in the Brodgar car park, with a QR code to the public toilets map on Orkney.com.</p> <p><u>WHS and Beyond</u></p> <p>(ii) Immediately implement Option 1(c)(ii), (iii) and (iv).</p> <p>(iii) Develop a new website for the WHS with a strong conservation focus. Acting as an online gateway, it would offer comprehensive orientation, interpretation and other resources for visitors, the community and other stakeholders.</p>	<ul style="list-style-type: none"> • Improves visitor experience • Promotes deeper visitor and community engagement with natural and cultural heritage and understanding of WHS' OUV and the area's protected landscape and biodiversity features • Encourages responsible behaviour and dispersal across and beyond the WHS • Offers significant promotion and marketing benefit

4.5. Preferred option

Based on an assessment of potential impacts, **the preferred option is Option 3 – install permanent toilets in the Brodgar car park**. The evaluation considered the following:

- (1) While both Options 2 (site temporary toilets in the Brodgar car park) and 3 directly address the toileting and waste disposal issues in the Brodgar car park, only Option 3 proposes permanent solutions.
- (2) Of all the options, Option 3 has the greatest potential to generate long-term sustainability outcomes. Extracted from the OWHSG Programme's strategic priorities (see section 3.5.3), these include:
 - Protecting the WHS' OUV and its setting as well as related designated heritage assets
 - Preserving natural heritage
 - Contributing to sustainable tourism³¹
 - Facilitating climate action
 - Enhancing community wellbeing
 - Supporting inclusion and accessibility
 - Promoting learning and knowledge
 - Demonstrating technological innovation
 - Ensuring mental, physical and spiritual health
- (3) Both Options 2 and 3 would require substantive environmental investigations, planning permission, and the introduction of physical and digital visitor management measures. While Option 2 could potentially be delivered by the 2025 season, this is not guaranteed and there is a question of whether investment in temporary measures represents best value when a permanent solution could potentially be in place two years later.

4.6. Interim mitigation

4.6.1. Option 1 – Do minimum

While the interventions in Option 1 neither directly address nor permanently resolve the toileting and waste disposal issues in the Brodgar car park, they could provide a degree of interim mitigation while Option 3 is being progressed. If actioned immediately, measures could potentially be in place this coming season.

³¹ The World Tourism Organization defines [sustainable tourism](#) as "tourism that takes full account of its current and future economic, social and environmental impacts, addressing the needs of visitors, the industry, the environment and host communities".

4.6.2. Supplementary toilet provision at Skara Brae Visitor Centre

Toilet facilities are available year-round within the Skara Brae Visitor Centre and HES has seasonally supplemented this provision for several years. However, increased visitation (to almost 107,000 visitors in 2023) now requires the seasonal toilets to be in place beyond the current 28-day period permitted without planning permission.

HES has suggested that it may be an option to seek temporary planning and other permissions to enable provision of supplementary seasonal (i.e., up to 6 months per year) toilets for 5 years. The 5-year period assumes that refurbishment of the visitor centre proposed within the OWHSG Programme would be completed by the beginning of the 2029 season and temporary additional toilets would, therefore, no longer be required.

Supplementary facilities would offer the following benefits:

- Improve the visitor experience
- Promote inclusion and preserve human health and dignity
- Encourage and enable coach and independent visitors to use the facilities while touring the West Mainland, helping to reduce undesirable toileting behaviour in the WHS and other countryside locations

As an early estimate, the extended supplementary toilet provision could require an additional investment by HES of approximately £14,000 per annum. However, before a decision can be taken, an analysis of the practicalities and cost implications of installing temporary toilets (including whether to purchase or hire facilities) versus potentially accelerating the visitor centre refurbishment timetable will have to be completed. The analysis will be undertaken this year. In the meantime, supplementary toilets will be available at Skara Brae for 28 days during the season.

5. Key considerations

5.1. Duty to provide public toilets

Provision of public toilets is not a statutory requirement of local authorities. However, there is a petition ([PE1955](#)) calling on the Scottish Parliament to urge the Scottish Government to make it a statutory duty for local authorities to provide good quality, clean and accessible public toilets, and to ensure sufficient funding is available to local authorities to meet this requirement.

5.2. Criminal offence

S.47 of the [Civic Government \(Scotland\) Act 1982](#) provides that “any person who urinates or defecates in such circumstances as to cause, or to be likely to cause, annoyance to any other person shall be guilty of an offence and liable, on summary conviction, to a fine”. It is understood this provision is enforced by Police Scotland.

5.3. Waste

5.3.1. Statutory nuisance

Undesirable toileting behaviour and irresponsible campervan cassette toilet waste disposal next to the Brodgar car park could be considered a statutory nuisance within the meaning of the [Environmental Protection Act 1990 \(as amended\)](#). As set out in s.79 of the Act, this activity could be categorised as “any accumulation or deposit being prejudicial to health or a nuisance” and possibly also “any premises in such a state as to be prejudicial to health or a nuisance”. Note for the purposes of these provisions “premises” includes land or buildings and “prejudicial to health” means injurious or likely to injure health. If it were determined that a statutory nuisance exists, the Council, as land owner, would be required to abate the nuisance.

5.3.2. Duty to keep land free of waste

S.89 of the Environmental Protection Act 1990 (as amended) requires the Council to keep its own land free of waste in particular circumstances. This duty is supported by the [Code of Practice on Litter and Refuse \(Scotland\) 2018](#). However, the Code refers to animal waste and not human waste and therefore its applicability to the circumstances of the Brodgar car park would need to be established.

5.4. OWHSG Programme

5.4.1. Option 3 – Install permanent toilets in the Brodgar car park

For reference, Option 3 comprises the following key elements of the OWHSG Programme:

- Brodgar car park refurbishment, potentially with toilets
- Coach booking infrastructure
- Visitor management app system
- Enhanced interpretation and orientation

5.4.2. Gateway centre

A key element of the OWHSG Programme is a new gateway centre, with orientation, parking area and toilet facilities, close to the A965 / B9055 junction. The centre is not intended to be a destination in its own right. It is proposed to be a small-scale facility offering orientation, ticketing for Maeshowe, access to different transport modes and some retail, with toilets and a seasonal food and beverage offer being provided. Its purpose is to support and encourage visitors with their exploration of the WHS.

Currently, the exact location of the gateway centre and full scope of its offer have not been finalised and delivery will be subject to several factors, including (but not limited to) feasibility, land ownership, capital funding, planning permission and stakeholder support.

5.4.3. Toilet provision

The provision of toilets at the gateway centre should not preclude toilets in the Brodgar car park. Instead, it should be recognised that, as long as there are visitors to Ring of Brodgar and no toilet facilities available somewhere onsite, undesirable toileting behaviour will persist. The introduction of management measures in the car park may reduce instances, but it is unlikely to eliminate them altogether.

Furthermore, if visitors are to be encouraged to leave their cars at the gateway centre and explore the WHS via the active travel network, toilets will also be required elsewhere in the area to prevent undesirable toileting behaviour in the countryside. Currently, the northern boundary of the proposed network is at Ring of Brodgar, a c.3-mile round-trip from the Brodgar road end, and situating toilets in the Brodgar car park would provide facilities at either end of the Core Path through the peninsula.

5.4.4. Project changes

Any change to the proposed programme, including acceleration of project delivery, will require approval of the OWHSG Programme Board and be subject to Islands Growth Deal change process.

5.5. Historic environment

The historic environment is a fragile and irreplaceable resource but also a dynamic one, and preservation of its most significant features is vital. Therefore, ongoing engagement will be required with HES' PCAS to fully understand the issues relating to the historic environment and ways in which impacts can be sensitively managed to protect the WHS and its OUV and related scheduled monuments and their settings, and any negative effects mitigated.

5.6. Natural environment

5.6.1. Habitats Regulation Assessment (HRA)

Assuming the new toilets will require a private wastewater system, an HRA for Loch of Stenness SAC will be required due to the connectivity between the proposed toilets and the SAC which is located approximately 340 metres to the west at the closest point. Loch of Stenness becomes Loch of Harray under the causeway carrying the public road

approximately 1 mile to the southeast and therefore, there is hydrological connection between the two lochs.

5.6.2. Environmental Impact Assessment (EIA)

An EIA may be required if the area of the waste-water treatment plant of the development exceeds 1000 square metres. In this circumstance, the development will be subject to adoption of a screening option which would determine whether EIA is required.

5.6.3. Otter survey and species protection plan

Survey for otter on proposed development site and surrounding area within 200 metres of the proposed development site. The results of the survey and, if evidence of otter activity is found, a species protection plan identifying appropriate mitigation measures based on the survey results, must be submitted with a planning application.

5.6.4. Breeding bird protection plan

Ground preparation, installation and other works associated with the proposed development should be timed to avoid the bird breeding season, i.e., take place during September to February (inclusive). If this is not possible, then a pre-start walk over of the site and inspection of vegetation by a suitably experienced (and licensed) ecologist will be required to identify signs of breeding birds and an appropriate breeding bird protection plan submitted for approval in writing by the Council before any ground preparation, construction or other works associated with the development commence (should planning permission be granted).

5.6.5. Excavation plan

If excavations are required (e.g., if the closest electricity and water services are to be accessed from 1,200 metres away – see section 5.9), the planning application will require inclusion of details on how excavation works would proceed, what would be done with excavated turves and soil (e.g., where and how they would be stored, if they would be reused and if so where and how), and what measures would be used to minimise the risk of pollution caused by fuel spills and sediment run off during wet weather.

5.6.6. Biodiversity form

The toilets will likely need some form of ground preparation and/or surfacing to ensure that they are stable, potentially resulting in habitat loss. In accordance with NPF4 Policy 3.b on biodiversity, an OIC Biodiversity Form would, therefore, need to be completed and submitted with any planning application.

5.7. Planning permission

Planning permission will be required for the proposed development in the Brodgar car park. The potential complexity of the development and the issues that could arise are likely to be reflected in the extent of details, plans and supporting documentation that will be required to support a planning application, and may also affect the timescale of achieving planning permission. There will be a significant number of material planning considerations to assess, as well as consultation with various statutory and non-statutory consultees. Moreover, the development will trigger certain legal obligations such as a requirement to undertake an HRA,

offer survey and possibly EIA (see section 5.6) due to the multiple designations and protected species in the area. Should the proposed development attract valid objections and be recommended for approval in terms of the Scheme of Delegation, the application would require to be determined by the Council's Planning Committee.

5.8. Building warrant

A building warrant will be required to install toilets in the Brodgar car park, confirming that the development complies with building regulations and providing legal permission to commence building work.

5.9. Available utility services

Electricity and water are not available in the Brodgar car park. The closest services are approximately 1,200 metres (as the crow flies) from the Brodgar car park and accessing them would require excavation, with an archaeologist onsite for potentially several weeks to provide a watching brief for the duration of the excavations.

5.10. Carrying capacity

To ensure effective and efficient management of the Brodgar car park, it will require to be rationalised to align with carrying capacity and anticipated use patterns, and to clearly demarcate all parking spaces and direct traffic flow. Visitor volume will be set in accordance with the physical capacity of the car park and informed by the ecological and socio-cultural capacity of the monument.

5.11. Unintended consequences

5.11.1. Further damage to monuments and their setting

While the proposed improvements will provide benefits, they will also attract more visitors who, in turn, could cause further damage to the monument and its setting. Accordingly, the introduction of robust visitor management measures such as capacity limitations and advance booking and fee payment requirements for coaches will be required. However, if only introduced at Brodgar, traffic is likely to be displaced to the Stones of Stenness, increasing pressure on the site. Therefore, management measures should be introduced at both sites concurrently.

5.11.2. Dangerous parking

With capacity limitations and managed access to the Brodgar and Stones of Stenness car park, the risk of dangerous parking on the B9055 during peak season could increase. The proposed digital management measures, with provision of timely, up-to-date visitor information and effective responsible tourism messaging, could help to mitigate this.

5.11.3. Diversion to other sites

The introduction of visitor management measures (e.g., capacity limitations and advance booking and fee payment requirements for coaches) at the Standing Stones and Ring of Brodgar car parks will almost certainly divert traffic to other sites beyond the WHS, increasing

tourism impacts on other sensitive locations such as Yesnaby and the Brough of Birsay car park at the Point of Buckquoy, for example, which already see more visitation than they can sustainably accommodate. Understanding of tourism patterns and impacts, and investment in visitor management and infrastructure (see section 5.14) could address concerns.

5.12. Finance

5.12.1. Estimated costs

Preferred option (Option 3) – physical elements

A phased approach, with internal governance and project development milestones, is proposed to progress the physical elements of Option 3 and ensure management of risk, costs, and other factors – see section 6.1.1 for full details.

The estimated cost to progress Phase 1 would be up to £60,000, comprising fees for external surveys, environmental and historical studies and reports, and internal project management. Costs would be shared equally by the Council and HES. However, at this stage, the scope of Phase 1 works has not yet been fully defined and, accordingly, the £60,000 figure quoted is a high-level cost estimate, calculated in consultation with external architects. If the scope reduces, the costs would be adjusted accordingly. Conversely, reasonable supplementary costs would be shared by the Council and HES.

There are currently too many unknown variables, and it is, therefore, not possible to establish a reasonable estimate of costs to progress Phases 2 and 3. Phase 1 investigations will refine project requirements, enabling costs for Phase 2 to be estimated.

Preferred option (Option 3) – digital elements

In preparing the Islands Growth Deal Outline Business Case for the OWHDG Programme in late 2022, high-level estimates were calculated for the coach booking system and visitor information and management app system. With the addition of a new WHS website, costs for the digital elements are estimated in the region of £550,000. Costs would be updated as part of the development process.

Interim mitigation (Option 1)

Estimated costs to progress Option 1 as interim mitigation would be up to £1,000 per annum for monthly Brodgar car park cleaning during the 2024, 2025 and 2026 seasons (May – September) and up to £4,000 for installation of directional signage.

5.12.2. Rural Tourism Infrastructure Fund (RTIF)

Subject to Scottish Government budgets, the physical elements of the preferred option would be eligible for RTIF support via a design grant of up to £20,000 and a capital grant of maximum £750,000 (75% intervention). Match funding of minimum 25% will be required and can be provided in cash or in-kind support in the form of officer time or land value.

Digital interventions and temporary measures (Option 2) are not eligible for RTIF support.

5.12.3. Islands Growth Deal investment

Subject to relevant governance processes, it may be possible to apply the Council and partners' investment in developing and delivering Option 3 as match funding for the UK and Scottish Governments' £6.5 million investment in the OWHSG Programme. Availability of this option is to be confirmed.

5.12.4. Revenue generation

Delivery of the proposed interventions will provide opportunities for revenue generation through charges for coach bookings, car parking and toilet use. Further details, including revenue forecasts, can be provided once the physical and digital projects have been developed. Also, compliance with the UK Subsidy Control Regime would be required if RTIF or other public capital grant funding is accessed.

In the interim, a donation scheme via mobile app could be trialled, beginning as soon as summer 2024. Details of the scheme could be publicised across the various partner websites with the responsible tourism messaging proposed in Option 1. Discrete signage would also be required to be installed in the Brodgar car park.

5.13. Human resource

5.13.1. Preferred option (Option 3)

As mentioned in section 5.12.1 above, a phased approach is proposed to progress the **physical elements** of Option 3 – see section 6.1.1 for full details. Phase 1 would be resourced as follows:

- Project management (on a fees basis) by officer resource within the Property, Asset Management and Facilities Service.
- Phase 1 of RIBA 0/1 stages of work (see section 6.1.1) would be outsourced to architects already retained by the Council through a procurement process.
- Client oversight, internal governance, and coordination with OWHSG Programme Board and Islands Growth Deal by officer resource within the Enterprise and Economic Growth Service.

Recruitment of an OWHSG Programme Manager, a 3-year post jointly funded by the Council and HES, is underway and an officer is expected to be in post by April 2024 at the earliest.

Subject to a successful appointment, and OWHSG Programme Board approval and Islands Growth Deal change process, the **digital elements** of the preferred option would be progressed by the OWHSG Programme Manager.

It is intended that the **digital elements** of the preferred option would be delivered concurrently with the **physical elements**.

5.13.2. Interim mitigation (Option 1)

Option 1 interventions could be delivered by existing officer resource within the Enterprise and Economic Growth Service.

5.14. Complementary tourism infrastructure development

WHS improvements should be supported by the infrastructure investment proposed in the Council's draft Strategic Tourism Infrastructure Development Plan (STIDP). The draft STIDP seeks to relieve tourism pressures on honeypot sites and encourage visitor dispersal through prioritised investment in key infrastructure such as upgrades to public conveniences in main settlements and other popular visitor locations, and diversification of the visitor experience. Toilet provision in the Brodgar-Stenness area is not currently included in the draft STIDP as this is being addressed through the OWHSG Programme.

The final design of a new community and visitor infrastructure hub in Dounby village (approximately 6.5 miles from the Ring of Brodgar), with a new, accessible toilet block and campervan waste disposal facility is underway and it is anticipated that the hub will be completed by March 2025. In addition, design has been completed for further infrastructure improvements (including toilets and, where appropriate, campervan waste disposal facilities) in Finstown, Stromness, Kirkwall, St Margaret's Hope, Sands of Wright and The Palace, Birsay. The delivery timetable for these projects is to be confirmed, subject to finance and human resource.

5.15. Stakeholder engagement gaps

5.15.1. Community and local tourism stakeholders

Given the time constraints for this options appraisal, it has not been possible to engage with neighbouring land owners, area residents and local tourism stakeholders to understand the impacts of the current activity in the Brodgar car park and wider Brodgar-Stenness area and potential effects of the proposed development on them. Should the proposed option be approved to progress, stakeholder consultation will be undertaken as part of the project development process.

5.15.2. Cruise lines

Orkney's cruise sector has experienced exponential growth in the last decade and now accounts for more than half of visitors to Orkney. Marine Services engage directly with cruise lines in relation to their role as Harbour Authority, but their responsibility and expertise do not extend to visitor management beyond the harbour area. Accordingly, there is a critical gap to be filled in direct engagement with cruise lines from a destination perspective, focusing on the need for a more responsible tourism approach to protect local communities and their valued places and enhance cruise visitors' experience. In addition, there are proposed operational changes (e.g., capacity limitations and advance coach booking requirements for the Brodgar and Stones of Stenness car parks) and potential new policy (e.g., the introduction of a cruise levy) which could adversely affect cruise lines' commercial interests and, by extension, Marine Services', the Council's, and local business' interests. Such matters require early consultation and lead time for implementation.

6. Next Steps

6.1. Preferred option

6.1.1. Physical elements

There is a number of unknown variables that can and will materialise as the project is developed. Therefore, the following phased approach to developing Option 3, with internal governance and project development milestones, is proposed to progress the physical elements of the preferred option and ensure management of risk, costs, and other factors:

Phase	Description
Phase 1	<p>March 2024</p> <p>Development and Infrastructure Committee considers proposals and budget request relating to progression of project strategic definition, and preparation and briefing stages (RIBA Stages 0/1³²).</p> <p>RIBA Stages 0/1 would involve historic, environmental, and survey works and strategic appraisal of planning considerations to confirm project requirements and determine whether they can be achieved on such a sensitive site and, if yes, the best means of doing this.</p>
Phase 2	<p>November 2024*</p> <p>Assuming Step 1 confirms that the project is indeed feasible, Development and Infrastructure Committee considers proposals and budget request relating to progression of concept design and spatial coordination stages (RIBA Stages 2/3³²), and related external funding application(s).</p> <p>RIBA Stages 2/3 would involve development of an architectural concept aligned with the project brief and in accordance with pre-planning advice, and then spatial coordination of architectural and engineering information and preparation and submission of a planning application.</p> <p>Subject to Scottish Government budgets, the project would be eligible for a design grant of £20,000 via the RTIF and, subject to approval, a grant application would be submitted at this stage.</p> <p><i>* provided specialists do not advise that environmental investigations must be delayed to a later time (e.g., so as not to disturb breeding birds)</i></p>

³² [Royal Institute of British Architects \(RIBA\) Plan of Work](#), the model for design and construction process of buildings

Phase	Description
Phase 3	<p>Timing to be confirmed at Step 2</p> <p>Policy and Resources Committee considers Stage 2 Capital Project Appraisal including proposals and capital budget request relating to progression of technical design and construction stages (RIBA 4/5³²), and related external funding application(s).</p> <p>RIBA Stages 4/5 would involve completion of all design information required to construct the project followed by construction.</p> <p>Subject to Scottish Government budgets, the project would be eligible for a capital grant of up to £750,000 (with up to 25% match required) via the RTIF and, subject to approval, a grant application would be submitted at this stage.</p>

6.1.2. Digital elements

The digital elements would be progressed through the Islands Growth Deal on an accelerated timetable, subject to OWHSG Programme Board approval and Islands Growth Deal change process.

It is intended that the digital elements would be delivered concurrently with the physical elements.

6.2. Interim mitigation

Progression of Option 1 could commence immediately, with all interventions potentially in place by May/June 2024.

7. Conclusion and Recommendations

7.1. Conclusion

The appraisal of options for toilet facilities in the Brodgar-Stenness area of the WHS was underpinned by the following facts:

- The Brodgar-Stenness area is exceptional and extremely sensitive.
- The WHS is highly valued by the community, visitors, and local businesses.
- Only interrupted by the pandemic, Orkney has experienced sustained tourism growth for more than a decade and the upward trajectory is forecasted to continue.
- Of the four main WHS monuments, the Ring of Brodgar sees the most visitors, yet access to the monument and associated car park is free and unmanaged.
- The adverse impacts of unmanaged tourism on the WHS and its setting, natural heritage, and the local community are both increasing and becoming more acute, with undesirable toileting behaviour and irresponsible campervan cassette toilet waste disposal now added to the list of issues.
- As long as there are visitors to Ring of Brodgar and no toilet facilities available onsite, the risk of undesirable toileting behaviour will persist, regardless of whether the monument and/or car park are managed.
- There is an urgent need for new and improved visitor management in the area if impacts are to be mitigated or possibly even prevented.

Accordingly, it is not difficult to accept that toilets are needed in the Brodgar car park. This view was reflected in the original report to Policy and Resources Committee in November 2023, which included a recommendation to install temporary toilets in the car park for a three-year period, until permanent facilities in the area could be delivered via the OWHS Programme. However, through the options appraisal process subsequently undertaken, perspective on the matter has progressed. It enabled greater understanding of the limitations of the temporary option and the extent of the challenges of installing toilets on the site (whether temporary or permanent) and provided an opportunity to explore and carefully consider potential permanent solutions.

Next steps are outlined in section 6, proposing a phased plan of work to progress a permanent solution and provide interim mitigation, highlighting complementary infrastructure investment, and identifying stakeholder engagement gaps to be bridged.

In summary, there appears to be a way forward, but it is neither simple nor swift, and given the complexities, it will almost certainly be costly to develop and implement. Regardless, the imperative to protect the WHS remains as the Heart of Neolithic Orkney is a place of Outstanding Universal Value to humanity, which should be protected for future generations to appreciate and enjoy.

7.2. Recommendations

7.2.1. Preferred option

It is recommended:

- (1) That Option 3, comprising the physical elements below, be approved and Phase 1 development, as outlined in section 6.1.1, be initiated:

Physical (Brodgar car park)	Digital
Permanent toilets	Coach booking system
Car park refurbishment	Visitor information and management app system
Automatic number-plate recognition camera	WHS website
Toilet signage	Online directions and navigation to nearest toilet facilities in Stenness (immediate implementation)
	Promotion of responsible enjoyment of the WHS via a new responsible tourism page on Orkney.com and related messaging across partner websites and other channels (immediate implementation)

- (2) That the digital elements be progressed through the Islands Growth Deal on an accelerated timetable, subject to OWHSG Programme Board approval and Islands Growth Deal change process.

7.2.2. Interim mitigation

It is further recommended:

That Option 1, comprising the following elements, be approved for immediate progression:

- Monthly Brodgar car park cleaning between May and September.
- Toilet access for cruise ship passengers at Hatston Pier.
- Directional signage in the Brodgar car park and Stenness village to nearest toilet facilities.
- Online directions and navigation to nearest toilet facilities in Stenness (also included in Option 3)
- Promotion of responsible enjoyment of the WHS via a new responsible tourism page on Orkney.com and related messaging across partner websites and other channels (also included in Option 3)

Appendix 1– Heart of Neolithic Orkney Statement of Outstanding Universal Value

Adopted by UNESCO World Heritage Committee Thirty-seventh session, Phnom Penh, Cambodia, June 2013

<http://whc.unesco.org/en/list/514>

Property	Heart of Neolithic Orkney
State Party	United Kingdom of Great Britain and Northern Ireland
Id. N°	514rev
Date of inscription	1999

Brief synthesis

The Orkney Islands lie 15km north of the coast of Scotland. The monuments are in two areas, some 6.6 km apart on the island of Mainland, the largest in the archipelago.

The group of monuments that make up the Heart of Neolithic Orkney consists of a remarkably well-preserved settlement, a large chambered tomb, and two stone circles with surrounding henges, together with a number of associated burial and ceremonial sites. The group constitutes a major relict cultural landscape graphically depicting life five thousand years ago in this remote archipelago.

The four monuments that make up the Heart of Neolithic Orkney are unquestionably among the most important Neolithic sites in Western Europe. These are the Ring of Brodgar, Stones of Stenness, Maeshowe and Skara Brae. They provide exceptional evidence of the material and spiritual standards as well as the beliefs and social structures of this dynamic period of prehistory.

The four main monuments, consisting of the four substantial surviving standing stones of the elliptical Stones of Stenness and the surrounding ditch and bank of the henge, the thirty-six surviving stones of the circular Ring of Brodgar with the thirteen Neolithic and Bronze Age mounds that are found around it and the stone setting known as the Comet Stone, the large stone chambered tomb of Maeshowe, whose passage points close to midwinter sunset, and the sophisticated settlement of Skara Brae with its stone built houses connected by narrow roofed passages, together with the Barnhouse Stone and the Watch Stone, serve as a paradigm of the megalithic culture of north-western Europe that is unparalleled.

The property is characteristic of the farming culture prevalent from before 4000 BC in northwest Europe. It provides exceptional evidence of, and demonstrates with exceptional completeness, the domestic, ceremonial, and burial practices of a now vanished 5000-year-old culture and illustrates the material standards, social structures and ways of life of this dynamic period of prehistory, which gave rise to Avebury and Stonehenge (England), Bend of the Boyne (Ireland) and Carnac (France).

The monuments on the Brodgar and Stenness peninsulas were deliberately situated within a vast topographic bowl formed by a series of visually interconnected ridgelines stretching from Hoy to Greeny Hill and back. They are also visually linked to other contemporary and later monuments around the lochs. They thus form a fundamental part of a wider, highly complex archaeological landscape, which stretches over much of Orkney. The current, open and comparatively undeveloped landscape around the monuments allows an understanding of the apparently formal connections between the monuments and their natural settings. The wealth of contemporary burial and occupation sites in the buffer zone constitute an exceptional relict cultural landscape that supports the value of the main sites.

Criterion (i): The major monuments of the Stones of Stenness, the Ring of Brodgar, the chambered tomb of Maeshowe, and the settlement of Skara Brae display the highest sophistication in architectural accomplishment; they are technologically ingenious and monumental masterpieces.

Criterion (ii): The Heart of Neolithic Orkney exhibits an important interchange of human values during the development of the architecture of major ceremonial complexes in the British Isles, Ireland and northwest Europe.

Criterion (iii): Through the combination of ceremonial, funerary and domestic sites, the Heart of Neolithic Orkney bears a unique testimony to a cultural tradition that flourished between about 3000 BC and 2000 BC. The state of preservation of Skara Brae is unparalleled amongst Neolithic settlement sites in northern Europe.

Criterion (iv): The Heart of Neolithic Orkney is an outstanding example of an architectural ensemble and archaeological landscape that illustrate a significant stage of human history when the first large ceremonial monuments were built.

Integrity

All the monuments lie within the designated boundaries of the property. However, the boundaries are tightly drawn and do not encompass the wider landscape setting of the monuments that provides their essential context, nor other monuments that can be seen to support the Outstanding Universal Value of the property. Part of the landscape is covered by a two part buffer zone, centred on Skara Brae in the west and on the Mainland monuments in the central west.

This fragile landscape is vulnerable to incremental change. Physical threats to the monuments include visitor footfall and coastal erosion.

Authenticity

The level of authenticity in the Heart of Neolithic Orkney is high. The state of preservation at Skara Brae is unparalleled for a prehistoric settlement in northern Europe. Where parts of the site have been lost or reconstructed during early excavations, there is sufficient information to identify and interpret the extent of such works.

Interventions at Maeshowe have been antiquarian and archaeological in nature; the monument is mostly in-situ and the passageway retains its alignment on the winter solstice sunset. Re-erection of some fallen stones at Stones of Stenness and Ring of Brodgar took place in the 19th and early 20th century, and works at Stenness also involved the erection of

a 'dolmen', now reconfigured. There are, however, many antiquarian views of the monuments attesting to their prior appearance, and it is clear that they remain largely in-situ.

The central west Mainland monuments remain dominant features in the rural landscape. Their form and design are well-preserved and visitors are easily able to appreciate their location, setting and interrelationships with one another, with contemporary monuments situated outside the designated property, and with their geographical setting. This relationship with the wider topographic landscape helps define the modern experience of the property and seems to have been inextricably linked to the reasons for its development and use in prehistory.

Protection and management requirements

World Heritage properties in Scotland are protected through the following pieces of legislation. The Town and Country Planning (Scotland) Act 1997 and The Planning etc. (Scotland) Act 2006 provide a framework for local and regional planning policy and act as the principal pieces of primary legislation guiding planning and development in Scotland. Additionally, individual buildings, monuments and areas of special archaeological or historical interest are designated and protected under The Planning (Listed Building and Conservation Areas)(Scotland) Act 1997 and the 1979 Ancient Monuments and Archaeological Areas Act.

The Scottish Historic Environment Policy (SHEP) is the primary policy guidance on the protection and management of the historic environment in Scotland. Scottish Planning Policy (SPP) sits alongside the SHEP and is the Government's national planning policy on the historic environment. It provides for the protection of World Heritage properties by considering the impact of development on their Outstanding Universal Value, authenticity and integrity.

Orkney Islands Council prepared the Local Development Plan that sets out the Council's policy for assessing planning applications and proposals for the allocation of land for development. The Plan contains policies that address the need to put an appropriate level of protection in place for the property and its setting. Supplementary Planning Guidance for the World Heritage Site has also been produced. These policies and guidance establish a general commitment to preserving the integrity and authenticity of the property. They also seek to manage the impact of development on the wider landscape setting, and to prevent development that would have an adverse impact on its Outstanding Universal Value through the designation of Inner Sensitive Zones, aligned with the two parts of the buffer zone and the identification of sensitive ridgelines outside this area. The Rural Conservation Area at Brodgar includes Maeshowe, the Stones of Stenness and the Ring of Brodgar, and it is envisaged to establish a Rural Conservation Area at the Bay of Skail.

The property is in the care of Historic Scotland on behalf of Scottish Ministers. A Management Plan has been prepared by Historic Scotland in consultation with the Partners who share responsibility for managing the sites and access to them: Orkney Islands Council, Scottish Natural Heritage, and the Royal Society for the Protection of Birds. The Management Plan is a framework document, and sets out how the Partners will manage the property for the five years of the Plan period, together with longer-term aims and the Vision to protect, conserve, enhance and enjoy the property to support its Outstanding Universal Value. It does so by identifying a series of key issues and devising specific objectives or actions to address these issues. The Steering Group responsible for implementing the Management Plan comprises representatives of the Partners. Stakeholders drawn from the tourist industry, local landowners and the archaeological community participate in Delivery Groups reporting to the

Steering Group with responsibilities for access and interpretation, research and education, conservation and protection, and tourism and marketing.

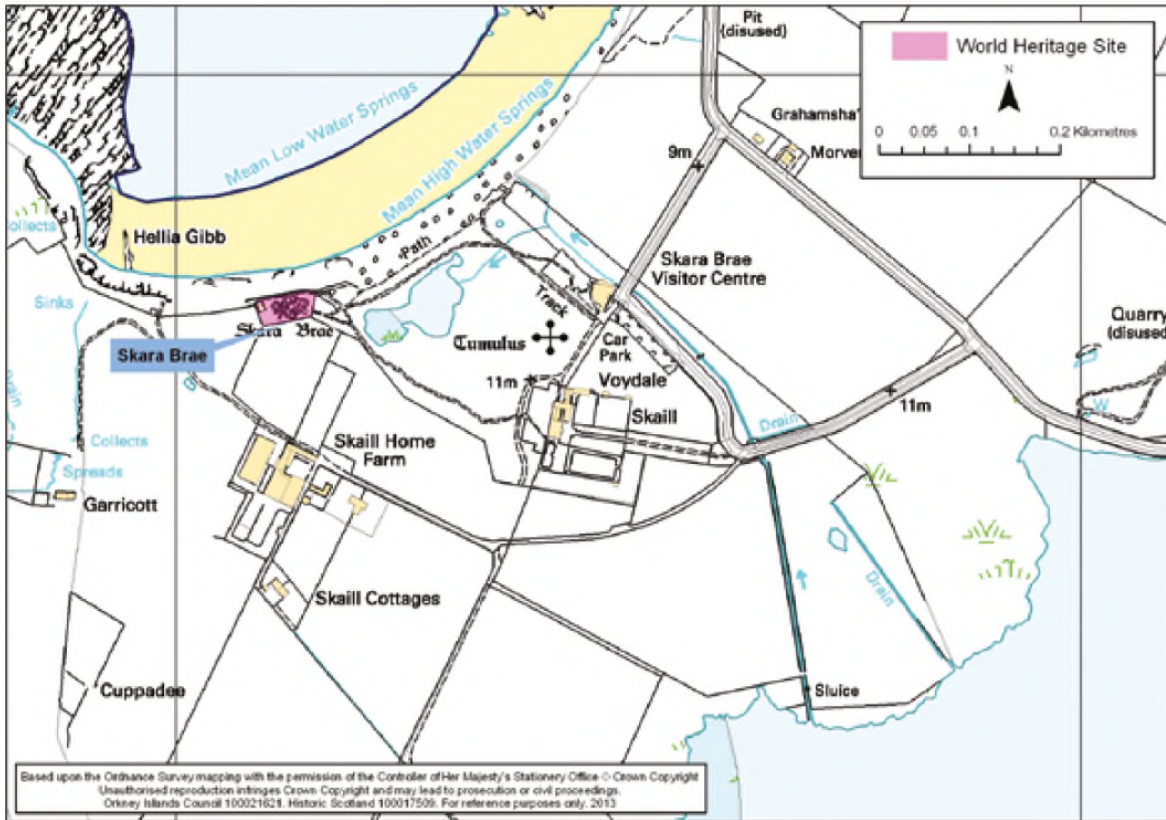
Condition surveys have been completed for each of the monuments. These documents record previous interventions and include a strategy for future maintenance and conservation. Conservation and maintenance programmes require detailed knowledge of the sites, and are managed and monitored by suitably experienced and qualified professionals. Conservation work undertaken at the sites follows national and international policy and seeks to balance minimum intervention with public accessibility to the monuments. Any intervention is given careful consideration and will only occur following detailed and rigorous analysis of potential consequences. In conservation work, local materials have been used where appropriate.

Management of tourism in and around the World Heritage property seeks to recognise its value to the local economy, and to develop sustainable approaches to tourism. Key approaches include improved dispersal of visitors around the monuments that comprise the property and other sites in the wider area. A World Heritage Ranger Service supports this approach and allows for on-the-ground education about the issues affecting the site. The relationships and linkages between the monuments and the wider open, almost treeless landscape, and between the monuments that comprise the property and those in the area outside it that support the Outstanding Universal Value are potentially at risk from change and development in the countryside. The long-term need to protect the key relationships between the monuments and their landscape settings and between the property and other related monuments is kept under review by the Steering Group. Policy HE1 as well as the Heart of Neolithic Orkney World Heritage Site in the Local Development Plan and the associated Supplementary Guidance require that developments have no significant negative impact on either the Outstanding Universal Value or the setting of the World Heritage property.

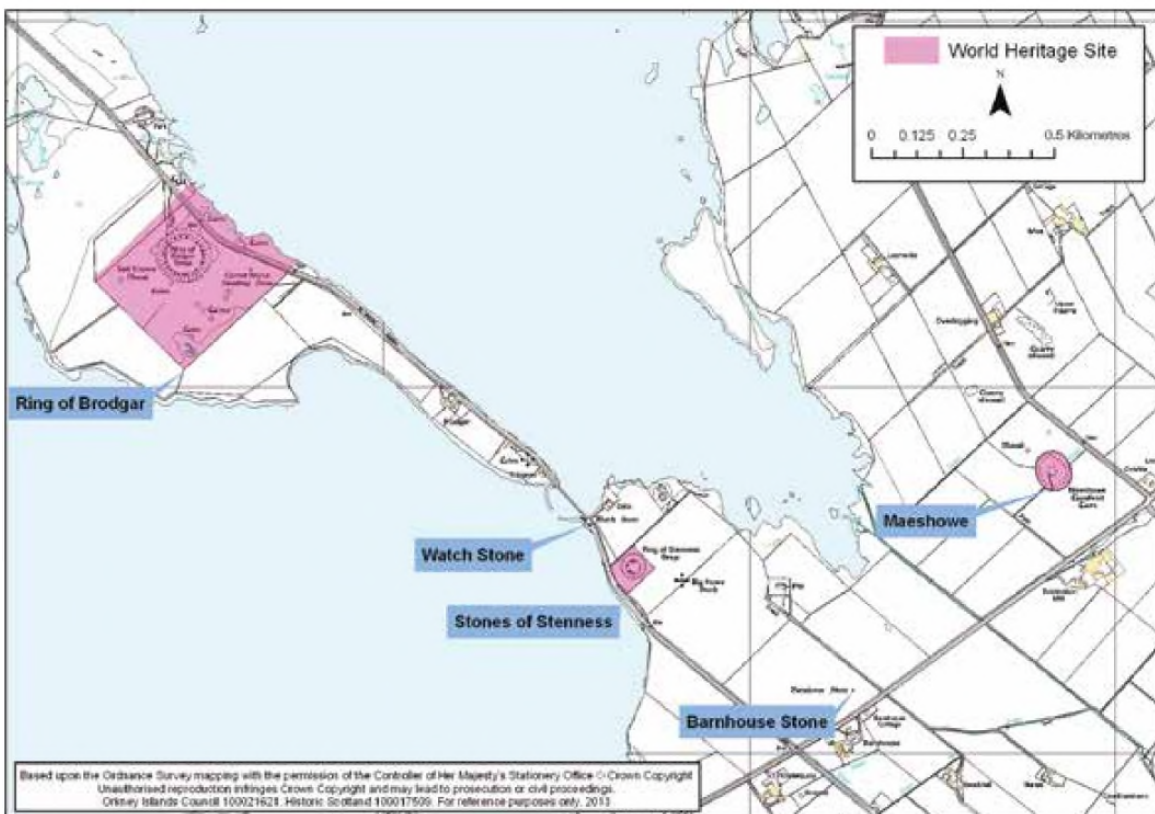
Appendix 2 – WHS, Buffer Zone and Sensitive Area



Appendix 3– Maps of Heart of Neolithic Orkney WHS



Bay of Skail, north-west Mainland



Brodgar-Stenness area

Appendix 4– Orkney WHS Gateway Programme

Details of the key project elements³³ are provided below.

New offer at the Ring of Brodgar, Stones of Stenness, and Maeshowe

Component	Description	Impact
New gateway centre	<p>Small-scale orientation centre set on greenfield site with parking acts as gateway point into the WHS, beyond which no vehicles proceed</p> <p>Provides orientation, interpretation, and visitor facilities in a low key highly sensitive and sustainable manner</p>	<ul style="list-style-type: none"> • Significantly improves visitor experience • Enables greater dwell-time on site and dispersal across site • Increased engagement with the natural and built heritage of the area • Promotes and supports conservation of the WHS • Encouragement to disperse beyond the site and visit other locations • Operational viability and flexibility to manage seasonal patterns of visitation
Active Travel Network	<p>Network of pathways, bike trails, and related infrastructure linking parts of the WHS</p> <p>Interpretation, signage, and lighting as appropriate to guide the visitor</p> <p>Brodgar Path Management system to reduce damage and erosion to the WHS</p>	<ul style="list-style-type: none"> • Greater dwell-time on site • Engagement with the natural and built heritage of the site increases • Healthier, more active lives • Connection to local communities in Stenness village and elsewhere • Safer pedestrian and vehicular routes • Conservation of the WHS
Reimagined digital and physical interpretation across the Site	<p>A range of digital and physical interpretation to fundamentally enhance the visitor experience as guests move across the landscape between the monuments.</p> <p>Linking the site and its stories to the wider Orkney offer</p> <p>Key elements also designed to allow remote access to the WHS, encouraging visitation from across the world</p>	<ul style="list-style-type: none"> • Greater dwell-time on site • Improved visitor experience, deeper heritage engagement with and understanding of site's OUV • Promotion and marketing benefit • Encouragement to disperse beyond the site and visit other locations

³³ Orkney Islands Council, Historic Environment Scotland and Highlands and Islands Enterprise (2022) Orkney World Heritage Site Gateway Programme Outline Business Case

Component	Description	Impact
Visitor shuttle and parking charges	<p>Zero emission “hop-on, hop-off” passenger shuttle moving visitors between the new gateway centre, Stones of Stenness, Ness of Brodgar, Ring of Brodgar, and Maeshowe</p> <p>Car and coach parking charges introduced at centre to support cost of operation</p> <p>Option to extend shuttle to Skara Brae depending on demand and market modelling</p>	<ul style="list-style-type: none"> • Greater encouragement to use Active Travel Network (return journey is via shuttle) • Removal of cars and coaches within WHS • Eliminate road congestion and improve road safety • Proactive management of site capacity • Parking revenue to fund passenger shuttle and site conservation

New offer at Skara Brae

Component	Description	Impact
Coach management infrastructure	<p>New trade entrance at Skara Brae for coach visitors</p> <p>Option for timed coach parking and arrival slots, with permit</p>	<ul style="list-style-type: none"> • Reduction in congestion at peak times • Improved visitor experience for trade and independent visitors • Greater control over trade visits, in line with post-COVID operating conditions
Reimagination of the interpretation offer	<p>A completely new interpretative offer blending digital and physical interpretation to improve the visitor experience and allow remote access to the site, situated outside of the pay barrier.</p> <p>Improvement to the interpretative connections between Skara Brae and the wider Neolithic Orkney story.</p> <p>Potential to reunite artefacts excavated from Skara Brae with the site (in partnership with National Museums Scotland)</p>	<ul style="list-style-type: none"> • Greater dwell-time on site • Extended visits through online materials • Improved visitor experience, deeper engagement • Promotion and marketing benefit • Quality of experience matches visitor expectation and global standing of site
Café realignment	<p>Re-alignment of the visitor centre to ensure café is accessible to all visitors to Skara Brae, not just those who have purchased tickets.</p>	<ul style="list-style-type: none"> • Increased dwell time • Increased revenue for the partnership • Improved visitor experience.

Islands-wide digital visitor information and management applications

Component	Description	Impact
Orkney-wide orientation	<p>Stronger orientation materials, signage, and information about the WHS and wider Orkney.</p> <p>Digital orientation for visitors, connected to physical points at Skara Brae and in Brodgar-Stenness area.</p>	<ul style="list-style-type: none"> • Greater dwell-time on site • Visitor dispersal across Orkney • Improved visitor experience, deeper heritage engagement • Extended visits through online materials • Improved conservation of WHS
Visitor information and management app	<p>Monitor activity at the sites to provide real-time information to the visitor.</p> <p>App suggests alternative things to see and do when sites are busy</p>	<ul style="list-style-type: none"> • Reduction in congestion at key sites at peak times, including at WHS • Visitor dispersal across Islands and attractions • Improved conservation at WHS and other key sites
Coach management infrastructure	<p>Timed, permit-based system for all coach traffic intending to stop at the WHS</p> <p>Maximum coach capacity per day/hour within the WHS</p>	<ul style="list-style-type: none"> • Reduction in congestion at key sites at peak times, including at WHS • Visitor dispersal across islands and attractions • Permit revenue to fund site conservation and operation • Improved conservation at WHS and other key sites