

Built Environment Forum Scotland (BEFS) is an umbrella body for organisations working in the built environment in Scotland. Drawing on extensive expertise in a membership-led forum, BEFS informs, debates and advocates on the strategic issues, opportunities and challenges facing Scotland's existing built environment. BEFS is a supporting member of the [Climate Heritage Network](#).

### BEFS involvement

In 2022, prior to formal consultation BEFS and HES worked together to ensure that over 100 sector organisations were invited to share their strategies, surveys, reports, and consultations, to form a baseline from which to begin developing a new historic environment strategy. A textual analysis showed the stated priorities within 132 documents from 89 sector organisations. These initial findings were used to inform workshops throughout the pre-consultation engagement period.

BEFS led six engagement sessions, online or in Edinburgh, throughout August 2022. Over the six sessions 107 stakeholders attended, representing 58 organisations.

BEFS has also led two consultation engagement sessions on the draft strategy, with around 60 attendees, producing two feedback reports, and worked with the National Trust for Scotland on their internal consultation.

### BEFS statement

BEFS welcomes this consultation on the new draft historic environment strategy, following wide ranging and comprehensive pre-consultation engagement with the sector. We note the extensive work undertaken by Historic Environment Scotland (HES), in listening to and incorporating feedback as part of the drafting process - and anticipate that this rigorous approach will be successfully carried over into the final draft.

During this consultation BEFS has sought Member views through workshops, online events, focussed discussions and written submissions. This response reflects the key aspects of this feedback; Members have also been encouraged to submit their own formal responses to the online consultation.

We note that the draft strategy is a five year strategy, and as such has a much tighter timeframe than its predecessor, and has been developed to respond to and reflect the world as it is today – very different from when Our Place in Time (OPiT) was first published in 2014 - and that the strategic goals contained in the draft align with current Scottish Government priorities, Scotland's National Performance Frameworks and the UN sustainable Development Goals. We consider a new strategy to be a positive advocacy tool for the role of the historic environment across multiple agendas. Detailed comments are given below, in response to the questions as outlined in the consultation survey.

BEFS will be responding only to relevant questions of the consultation, as below:

**Q 14 Do you support this mission statement? Please use the text box to explain what you like about it or what you would change**

***'Our mission is to harness the power of the historic environment for the benefit of our society'***

- Yes I support this mission statement.

It is generally felt that the spirit of the mission is broadly correct and is to be welcomed – in particular, the recognition of the historic environment being of benefit to society is well received. As it is upfront in the strategy the mission serves as a hook to encourage interest from outwith the sector.

Some suggestions around clarity of language include:

- 'harness' could be a more intentional word
- Some issues around the word 'power' – given EDI associations and challenges, and can have negative connotations referring to 'power dynamics'. Would 'potential' sit better here?
- Get rid of 'our society', just 'society' could be enough? OR - Benefit to 'people' rather than 'society'
- One suggestion could be for an alternative mission: 'We want to sustain and enhance the benefits of the nation's heritage and ensure the HE is at the centre of national life'. [Note: this comment refers to a line already used in the current draft]
- Another suggestion for rewording the mission: *Our mission is to care, protect, and promote the power of the historic environment for the benefit of society*

### Q 15

**These are the six principles that have been identified in feedback from the engagement workshops. Do you agree with them? Please use the text box to explain what you like about them or what you would change. You do not have to choose a response option to comment in the text box.**

**Please add any comments on principles here:**

BEFS supports the principles and notes Members' view that these are seen to broadly represent key ways of working for the sector. With this in mind, one suggestion could be to re-frame the section from 'Principles' to 'Ways of working' – this would help define the status of the six 'principles' within the document and make clear the intent that these principles are integrated throughout the work undertaken by the sector; also reflecting that they not measured in the same way as the KPIs later in the document.

### Q 16

**We have identified three key priorities as the focus for delivery over the next five years. Do you agree with them? Please use the text box to explain your answer. You do not have to choose a response option to comment in the text box.**

As with the 'principles' above, there is a general agreement that these three priorities represent a sound focus for delivery over the next five years and are broadly representative of the strategic aims and activity of the sector in general. BEFS suggests that each priority would however, benefit from more narrative expressing what it means to the sector, setting the scene for the main issues and interests. A short line, outlining key sector impact would help to frame the priorities and better connect them to actions.

An explicit recognition that other work (of value) is already taking place was seen as an omission – and potential missed opportunity – and considered to be an essential addition to the strategy. It was also felt that there was a need to acknowledge the challenges facing the sector as part of framing the priorities.

When first viewing the priorities within any finished document it would be useful if they were presented in parallel – across the page, therefore avoiding any debate as to which has (or lacks) primacy.

Specific comments, relating to the Priority areas can be seen below:

#### **Priority 1 – Enabling the transition to Net Zero**

Summary of overarching comments:

Priority 1 is felt to support the strategic message of heritage delivering towards net-zero and offering support around the difficult decisions required in refining local authority guidance. However, Members noted concerns over delivery - and whether there are the necessary skills to enable this priority. Within this, challenges around retaining/preserving area character and protections were raised, as part of any requirement for climate adaptation or intervention of historic environment assets.

Further challenges were noted around training, skills gaps/shortages (many of the comments are reflected in more detail in relation to the KPIs and actions in later sections of the consultation). BEFS considers it imperative that these priorities are framed in a way that enables the sector to see how it can collectively and strategically work towards achieving them, within the identified timeframe. Part of this could be increased accessible and varied guidance for historic buildings/test cases.

Within the linked Key Performance Indicators, KPI1 could include a clearer definition and championing of 'fabric first', with greater reference within the priority to embedded carbon contained within existing buildings, and a presumption for retention and re-use over demolition.

It is welcomed that tackling the biodiversity crisis is a part of the KPIs attached to this priority, but more could be made of this in clearly linking the priority to the attached actions – and other KPIs such as developing green Skills in KPI3. With some comments warning of the current lack of a clear strategy to sustain an appropriately trained, skilled, and supplied workforce, the risk of being reliant on an already strained workforce has been highlighted.

### ***Priority 2 – Empowering vibrant, resilient, and inclusive communities and places***

Summary of overarching comments:

BEFS welcomes and acknowledges that this priority supports many other strands of work and is seen to help ensure that communities have an active role, as volunteers; there could however be could however be further benefit from clearer direct links to related strategies and plans such as NPF4 and Local Place Plans. As with comments relating to Priority 1, it would be beneficial to see key aspects and language – particularly reference to place and place-based approaches – reflected in the related KPIs and actions, at both national and local level. Similarly, concerns over lack of resource to deliver against the Priority are pertinent.

Other comments from Members include:

- Community agency and empowerment is presented as a goal in itself: would like to see the inclusion of care for the historic environment via that agency and empowerment
- There is no mention of the existing structure for the benefit of archaeology through DC (planning). Landward have produced reports on this
- There must be appropriate resource at local and regional level. Raising community expectations without the support for organisations such as Local Authority, museums, Archaeology Service will be detrimental
- Priority 2 introduction: Make it clear that professional skills are included in the first paragraph after the bullet points
- Ensuring that inclusivity is at the heart of the strategy to target 'hard to reach' communities on the basis of age, disability, race and socioeconomic background

### ***Priority 3 – Building a wellbeing economy***

Whilst there are detailed comments below it is also of note that the title of this priority was an area of confusion for some. The language here may need some unpacking to be accessible across the sector, as well

as more widely. The wellbeing economy is clearly defined in policy terms through work from WEAll as well as through sources such as - **Wellbeing Economy Playbook: tools and methods for designing policies for a wellbeing economy** [https://sustainable-prosperity.eu/media/documents/Wellbeing\\_Economy\\_Playbook.pdf](https://sustainable-prosperity.eu/media/documents/Wellbeing_Economy_Playbook.pdf)

Summary of overarching comments:

As above BEFS welcomes how this priority ties into other work (case studies would illustrate this), and the opportunities for partnership working, strengthening links between the historic environment and health and wellbeing, with the Wellbeing Economy agenda helping to tie this strategy to other key policy areas - although (as stated above) the language and terminology of this priority require some development and clarification, in particular how a Wellbeing Economy interfaces with inclusive growth and community wealth building, within the draft strategy.

Further, and as above, without defined and planned ways to ensure an appropriately trained, skilled, and supplied workforce, this priority was not seen to be achievable. The skills shortages identified in the pre-consultation research raise the issue of a lack of existing local expertise.

When considering whether there were any essential aspects not included within the three priorities, or whether they had any other comments Members identified the following:

- **Understand, record, investigate should be a principle**
- The inclusion agenda is a bit lost in these priorities - perhaps 'communities' could more explicitly refer to communities of place, interest and identity?
- **A clear definition/overview of the place in which the strategy/ OPiT fits within the wider policy landscape (in relation to HEPS, NPF4 etc) would be useful (perhaps as a diagram).**
- Archaeology is underrepresented
- How do the principles and priorities relate?
- How are Priorities 1/2/3 inter-related. Are overarching themes needed?
- Whole-life costing in measuring climate impacts – greenest building already built
- **KPI actions should be 'examples'**
- There is a lack of active EDI language
- Wellbeing Economy should address poverty and fuel poverty, setting out how the historic environment to benefit the most vulnerable
- A question of whether these are representative priorities for assets / people / place.
- Direct reference to the Place Principle – an opportunity missed to better articulate place-based collaborative approaches

Crucially, it was considered that whilst the priorities in themselves were felt to be broadly correct and useful, that much core historic environment activity undertaken by the sector was not represented.

**Members were clear that the 'day job' and current value of protect and care etc should be incorporated and acknowledged. A solution to this could be to include a page detailing what the sector already does, recognising that much of what it contained withing the priorities, KPIs and actions can - and does - cross over. This would also need to clearly link and read across to actions related to strategic priorities.**

### Q 17

**Each priority has a set of outcomes expressed as Key Performance Indicators (KPIs) associated with it. Do you agree with these KPIs? Please use the text box to explain your answer. You do not have to choose a response option to comment.**

- I suggest changes to one or more of the KPIs and/or have ideas for additional KPIs

If you have comments on the KPIs, including new or different measures that could be used, please comment below:

BEFS has heard from a number of Members that there is a strong feeling that including KPIs at this stage and within the strategy is somewhat premature (instead presented as 'outcomes') and that *KPIs become a poor proxy for too wide a variety of work when expressed at this scale.*

KPIs are suitable to a corporate body, but arguably not as effective in a strategy which organisations of all scales need to be able to support. KPIs were however seen as a more useful aspect of the delivery plan and that as part of delivery this level of detail and measures would be actively useful.

Relating to the KPIs within the draft, the overarching concerns are around delivery, with clarification sought around the language e.g., "should" and "must" – within these KPIs is the baseline, what is scalable? Essentially, the wording and framing of the KPIs will be important.

BEFS has heard concern from Members that this was *"a list that people and organisations 'had to do' rather than creating an environment that would enhance their work, or leverage opportunity.* One suggestion could be for the actions to be framed as examples and not an exhaustive list.

Other recurring themes were that:

- Wide support would be needed for communities to enable delivery
- **There were too many KPIs and actions, although it was readily acknowledged that agreeing which bits to cut would be contentious**
- These are a lot to deliver in 5years – a more concrete action plan needed

Specific comments and suggestions relating to the individual KPIs by Members are outlined below:

***KPI 1: Enabled emissions reduction***

- Include reference to VAT reform? Look for parity on newbuild and repair and maintenance.
- How would a carbon baseline be established – we don't have the data to do this yet!
- **We need more than delivery mechanisms by 2028, we need to be delivering**
- Suggested addition after 'cutting energy use in historic buildings' to include '...in ways that do not damage the fabric or the buildings' long-term sustainability' or similar. (Could use 'appropriately'.) Although BEFS recognises that the usual procedures and protections are, and will continue to be, in place around decisions impacting the historic environment

***KPI 2: Prepared the historic environment to be more climate resilient***

- Amend to: Extent to which historic environment is more resilient to changing climate

***KPI 3: Created new pathways for key green skills to deliver the historic environment's net zero transition***

***KPI 4: Supported organisations that care for the historic environment to be more resilient***

- Amend to: Support organisations that study and care for the historic environment to have the right skills and be more resilient. This pulls wording from the actions and makes it clearer that skills are a key part of this KPI.

***KPI 5: Communities have a stronger voice in decisions about their historic environment***

- The measure could be part of the KPI as it is much broader and helps to ensure that there is a relevance to place within this KPI, which is currently lacking. The measure could become 'Evidence the inclusion of the historic environment placemaking and community voice in local, regional and national plans.'

**KPI 6: Increased participation of children and young people in heritage**

- Some suggested that disadvantaged groups and marginalised children and young people should be prioritised within this KPI.

**KPI 7: Delivered a responsible economic contribution**

- What does "responsible" mean in this context?
- Add a reference for Research Frameworks (Archaeology Strategy Aim 3)
- The responsible economic contribution could reflect that, with support and training, people can move from dependence to contribution

**KPI 8: Increased the proportion of jobs created in the historic environment that meet fair work practice**

- How will this data be collected (beyond HES properties)?
- What is the current baseline?
- Note: Young Persons Guarantee has no defined actions, measurables, or accountability. It is a pledge

**KPI 9: Helped to improve wellbeing and quality of life through engagement with heritage**

- Add a reference to encouraging greater engagement (Archaeology Strategy Aim 4). Specific examples such as the Heritage Heroes programme or British Archaeology Awards might sit well alongside Make your Mark

**Q 18**

**Under each KPI, we have set out the actions we might take at national level to deliver our mission. Do you think these actions are the right ones to deliver against the KPI? Can you suggest alternatives?**

- I suggest changes to one or more of the actions and/or have ideas for additional actions

It has been noted by Members that there could be a perception that many of the actions require HES to lead them, whether this is the intention or not – raising the question of whether this could inhibit partnerships?

Specific comments and suggestions relating to the individual KPIs by Members are outlined below:

**KPI 1: Enabled emissions reduction**

- Omits mention of renewables
- Omits reference to reduction in car kilometres by 2030
- Second to last point, parameters given here 'mitigates and adapts the historic environment assets' could be followed by 'with a heritage/conservation led fabric-first approach' or similar.
- Last bullet excludes funding
- Add 'Develop training and guidance to help organisations achieve net zero goals.' This would enable an organisation or a contracting body to apply for funding to create toolkits/training for various net zero goals

**KPI 2: Prepared the historic environment to be more climate resilient**

- In addition to Traditional Buildings Health Check could add mention of 5 yearly tenement inspection proposals
- A national campaign to ensure property owners and occupiers understand the benefits of repair and maintenance
- Limited reference to landscape and interconnected nature of historic and natural environment
- Demonstrating best practice in regional examples

***KPI 3: Created new pathways for key green skills to deliver the historic environment's net zero transition***

- 'Develop baseline data for Scotland's heritage skills needs to inform planning and decision making' add 'Develop AND support'

***KPI 4: Supported organisations that care for the historic environment to be more resilient***

- 'Develop the Research & Development infrastructure for heritage in Scotland by creating new national centres for skills and innovation'. There is some question here as to what is meant by this action and whether there is duplication with the Engine Shed
- Link climate resilience to business resilience in connection to energy crisis

***KPI 5: Communities have a stronger voice in decisions about their historic environment***

- Provide advice, guidance, and inspiration to enable MORE communities to be able to acquire and manage heritage assets
- Could usefully include funding here
- Local Place Plans could be usefully referenced here

***KPI 6: Increased participation of children and young people in heritage***

- New duties in Local Development Plan preparation in relation to this KPI - needs to be aligned

***KPI 7: Delivered a responsible economic contribution***

- 'Work with regional economic partnerships to embed heritage in local regeneration and enterprise'. Change to '....to embed the positive management of heritage in local regeneration...'?
- Add 'Nationally we will ensure that those managing change to the historic environment have access to expert advice and data to maximise potential for public benefit from economic activities'?

***KPI 8: Increased the proportion of jobs created in the historic environment that meet fair work practice***

- Signposting: The Skills Investment Plan is directly referenced. Could reference here to the Archaeology Strategy be beneficial here?

***KPI 9: Helped to improve wellbeing and quality of life through engagement with heritage***

- Develop a programme of free entry to heritage attractions across Scotland for priority groups, for instance children and young people, or people living in poverty or experiencing social isolation' How would this work in practice?

**Q 19**

**Under each KPI, we have set out the actions we might take at a local (regional) level to deliver our mission. Do you think these actions are the right ones to deliver against the KPI? Can you suggest alternatives?**

- I suggest changes to one or more of the actions and/or have ideas for additional actions. BEFS Member comments included against the KPIs below:

*Note that comments here contain some cross over with responses to responses given in Q18.*

### ***KPI 1: Enabled emissions reduction***

- Encouraging local action to address biodiversity loss for example habitat and species improvements on land associated with the historic environment

### ***KPI 2: Prepared the historic environment to be more climate resilient***

### ***KPI 3: Created new pathways for key green skills to deliver the historic environment's net zero transition***

- 'Choose skilled and qualified craftsman when undertaking repair or maintenance work on the asset you care for' - could incorporate upskilling contribution to this KPI.

### ***KPI 4: Supported organisations that care for the historic environment to be more resilient***

- 'Consider updating your organisation's reserves policy' – important not to penalise organisations with healthy reserves in a time of inflation. Action perhaps needs clarity.

### ***KPI 5: Communities have a stronger voice in decisions about their historic environment***

### ***KPI 6: Increased participation of children and young people in heritage***

### ***KPI 7: Delivered a responsible economic contribution***

- Potential to add a reference for Research Frameworks (Archaeology Strategy Aim 3) in this section

### ***KPI 8: Increased the proportion of jobs created in the historic environment that meet fair work practice***

- KPI could be made more relevant to wider reaches of the sector if it referred to all 8 of the FWF targets. The measure could be to increase the number of sector organisations who are committed to achieving those targets?

### ***KPI 9: Helped to improve wellbeing and quality of life through engagement with heritage***

- Potential to add a reference to encouraging greater engagement (Archaeology Strategy Aim 4)
- Specific examples such as the Attainment through Archaeology and/or Adopt-a-Monument which utilise heritage to develop transferrable skills through volunteering (often in areas of low SIMD areas/'rural' areas) might sit well alongside Make your Mark. Otherwise just a general descriptor that might catch these scheme's outcomes

## **Q 20**

### **What structures and mechanisms are needed to oversee successful delivery of the new historic environment strategy?**

As mentioned previously, how the strategy is delivered was agreed by Members to be key. It is recognised that delivery mechanisms and measures are being explored as part of this consultation process and that this is a work in progress.



Assurances are sought, however, that the strategy *can* be delivered against - with some concerns that the many KPIs are difficult to measure. KPIs could also potentially be seen as a corporate way of working, which may not resonate with all organisations, groups, stakeholders or other desired end users of the strategy.

**Reflecting on the delivery of the first OPiT, BEFS heard a strong and coherent message from Members that delivery will require a much more transparent structure, with delivery groups working to shared and measurable aims – directly informed by the strategy. Central monitoring and management of the groups, enabling a task and finish structure, would assist with ensuring the KPIs are measurable (and measured!), with membership to the various delivery groups made wider. Membership of these is also required to be more transparent, with local voices felt to be absent. A dedicated OPiT resource is suggested to achieve these aims, as well as a shared location for accessing OPiT documents and papers.**

Similarly, it has been noted that decisions around OPiT must also be transparent – the CEO forum could be a more effective way of sharing information at a high level.

Other structures and mechanisms could include:

- Can KPIs relate to an existing (sector) baseline with measuring to fit alongside?
- Funding - align in a place-based manner
- De centralise training hubs and encourage regional / local delivery  
Fewer, larger and longer grant awards to allow charities to operate effectively - too many short-term small pots at present
- The proposed sector route map to net zero needs to be expedited
- Use local/regional delivery modes that are responsive to local issues
- Clear positioning of new historic environment strategy within the existing policy landscape
- Explore the opportunity to link up with existing regional forums – ensure delivery will be supported outside the central belt
- Need to ensure greater diversity in delivery groups
- Delivery mechanism should maintain direct line to Ministers
- Data – a requirement for better ways of collecting data to show the strategy is being successfully delivered
- Opportunity to weave NPF4 to the handling of historical assets within the planning system
- Provide new case studies to demonstrate actions/activities. E.g., community groups doing local history
- Meaningful and pragmatic comments and suggestions were made around establishment of a delivery plan / route-map – these highlighted *current* training needs and lack of sector diversity as steps to be addressed on the way to future success.
- Place the level of detail contained within the KPI actions within in a delivery plan/route map and to show the current status of work/actions, and the progress that would be expected within timeframe of the five year strategy - split into short/med/longer term actions/outcomes

Further clarity around questions such as who undertakes monitoring, how will the measurement of delivery of KPIs be passed on to other organisations (e.g., required / expected) and on which level should data be collected would be welcome as the delivery plan is progressed.

### Q 21

**Participants attending the engagement workshops asked for regional opportunities and mechanisms to help deliver the strategy. Do you have suggestions for how a regional approach to delivery might work?**

## Comments on National /Local

Localism was of key importance during the previous pre-consultation engagement – and helped to reflect the importance of delivery at local level. BEFS considers the draft strategy to successfully introduce explicit recognition that local and regional actions and activity are a key aspect of delivering a national strategy.

This is articulated in the presentation of the defined actions and definition between local and national; it is recognised that the intent within the draft is to give agency rather than necessarily impose responsibility. However, due perhaps to the presentation and framing of the actions, some ambiguity resulted in Members' concern that already stretched local capacity would be further tested.

Comments/solutions could include:

- **'Collectively we will' could be reframed as 'Nationally'**
- **'Locally you can' could be reframed as 'Enabling action by all'**
- Adding an aim to work locally (where expertise possible) into the national actions?
- The local could include mention of place-based approaches including the Place Principle
- Some concern that if national / local split was reflected in funding, people would lose track of different funding and grants for OPiT deliverables
- How are they linked? The strategy could see stronger collaboration at local and national level
- 'We will/ you can' is welcomed as an approach but this is ambiguous in relation to the mission where local is 'you'
- Local could be read as 'othering'
- How to measure activity identified as 'local' against 'national' aims?
- Local Authorities have expressed the need for help and training on giving retrofit advice – lack of skills in the face of huge demand
- Is it clear how regional strategies can work, alongside the national strategy?
- Should grants and fund providers start to use the tracking of these KPIs, organisations will need assistance and structure, to integrate into their own performance measurements

### Q 22

**If applicable, what role would you like to have in delivering the strategy? An example of a role could be taking part in a steering group overseeing delivery of the strategy or taking part in a working group that delivers to a particular priority.**

BEFS would continue to be actively involved in any future structure to support sector engagement and delivery of the strategy.

### Q 23

**What impact do you think the strategy might have on people with protected characteristics? Please add any comments below the table.**

- No comment

### Q 24

**What impact do you think the strategy might have on the competitiveness of Scottish businesses, the third sector or the regulatory context? Please add any comments below.**

- No comment

**Q 25**

**What impact do you think the strategy might have on people in island communities? Please add any comments below.**

- No comment

**Q26a**

**Has our environmental assessment identified the likely environmental effects of the options?**

- Yes it has identified the likely environmental impact

**Q 26b**

**Do you think there are any additional environmental mitigation, enhancement, or monitoring measures that should be considered?**

- No comment

**Q 26c**

**Do you have any other comments on the environmental assessment? If so please comment below.**

- No comment

**Q 27**

**Do you have any final comments on the draft strategy?**

Multiple BEFS Members and Associates are also submitting their own detailed responses and BEFS hopes that the considered thoughts within these are also taken into account, as part of the consultation process.

BEFS would like to acknowledge the rapid timeframe for consulting and delivering the new strategy and commends all who are involved and have contributed to the process thus far.

Overall, we consider the intentions of the strategy to be well placed, and the key strategic areas to be representative of wider sector interests.

In discussion there was wide agreement from Members that a few additions and some reframing would significantly enhance the strategy and make it more workable across the sector. To further strengthen the strategy some improvements around how the content is framed; the language used; and stronger, more explicit positioning of the historic environment could be transformative.

- A paragraph outlining why the strategy is needed - articulating the complex ecosystem of the sector and the wider 'scapes' in which the historic environment sits and contributes - along with the pressures on - it would be a useful method for framing what follows.
- A page near the beginning outlining the current actions across the sector that will not be halted, and will contribute to the priorities, but are the 'day job' was seen as essential to explaining the breadth and depth of the current and continuing necessary work across the sector. This would enable fewer priority national/local actions and therefore less perceived - or actual - pressure across all parts of the sector.
- A diagram linking the historic environment benefits across to Scotland's National Performance Framework, as an output of the Built Heritage Investment Group, exists and would be a useful shorthand. Further, setting the context for why this strategy looks different - and that it is building on the original OPIT with tasks/deliverables that are still ongoing – would be useful.

## Consultation for Scotland's new historic environment strategy

20/February/2023

Additional careful consideration of the structure, layout and graphic illustration of the strategy could greatly improve its accessibility to the wide range of audiences it is aimed at, and thereby increase its impact.

- The extensive list of actions (at all levels) needs to be reduced, to enable and enhance deliverability.

BEFS would also suggest that key messaging on retrofit / adaptive re-use and more importantly regular maintenance could be further amplified.

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Concern was also raised by Members that there is bias towards 'buildings' specifically and this could be problematic for other forms of the historic environment.

Members also note that Tourism dichotomy is not represented as part of the strategy, with the visitor economy a major source of income for the sector. Much work is still to be done here to ensure that the income recovers, recognising the economic challenges that come with this and balancing Sustainable Tourism needs – as higher visitor numbers bring challenges to wellbeing, net-zero, and fabric protection aims.

In covering the vast subject matter, the draft document sometimes swings from broad, overarching strategic priorities, to detailed and granular activity. As mentioned, the effect of this can be one of forming a 'to do' list, rather than a 'menu' of activity by which organisations can evidence their contributions to delivering on a national level.

The use of 'we' 'you' and 'us' should also be revisited – to avoid doubt about who is being referred to and the expectation that 'we' is 'Historic Environment Scotland'. 'You' is at times within the document both unintentionally pejorative and 'othering'.

Whilst BEFS recognises where the draft does this well, the document *as a whole* could speak more strongly to the wider contributions the historic environment brings across social, environmental and economic spheres, more loudly advocating and championing the historic environment as a solution/contributor in addressing wider national challenges. This strategy is an opportunity for the sector to set out – publicly and for the attention of Ministers – what it has been saying for years.

BEFS provide secretariat for the [Conservation Officers Group \(COG\)](#) and has included local authority feedback within this consultation response.

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BEFS responses to a number of Consultations in relation to the Built Environment can be found at:  
<https://www.befs.org.uk/resources/consultations/>

### RESPONDENT INFORMATION

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## Consultation for Scotland's new historic environment strategy

20/February/2023

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Historic Environment Scotland would like your permission to publish your consultation response. Please indicate your publishing preference: **Publish response with name**

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