

The National Trust for Scotland: response to the consultation for Scotland's new historic environment strategy, February 2023

The National Trust for Scotland (the Trust) cares for, shares and speaks up for Scotland's magnificent heritage. The Trust was involved in the delivery of the first Our Place in Time strategy and have contributed to the development of this strategy through workshops led by Historic Environment Scotland and Built Environment Forum Scotland. We welcome the opportunity to continue to shape the Historic Environment Strategy through this consultation.

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

The Trust agrees that the overarching aim of the Strategy should be to benefit society. However, 'harness the power' lacks meaning and feels hollow. The Trust recommends 'harness the power' is replaced with wording that specifies how the historic environment to deliver benefit to society- for example 'protect and enhance'. This wording would also mean the mission statement references the Environment outcome in the National Performance Framework of "we value, enjoy, protect and enhance our environment."

Replacing 'society' with 'people and communities' would make the mission statement more relevant and inclusive.

People in Scotland need to be more engaged with our historic environment and its fragility – much is taken for granted yet the sector is under-resourced and in crisis from a lack of funding and skills and historic properties closing. To engage people and help them understand the challenges, the mission statement should impart a sense of urgency and have emotive resonance.

The Trust also believes that more consideration should be given to the wording 'historic environment'. The Historic Environment Strategy for Scotland has been mis-interpreted as Historic Environment Scotland's strategy by some, demonstrating a need for more daylight between the terms. We recommend that any alternative phrase 'historic environment' should be tested by the public. This is expanded on further in Q27.

15. These are the six principles that have been identified in feedback from the engagement workshops. Do you agree with these principles?

The Trust agrees that these principles should underpin the way we all work and welcome their inclusion in the Strategy. However, we believe the language should be looked at and are concerned that some principles are not reflected throughout the strategy.

The language in the principles should be changed from "we must", which can sound grudging or legalistic, to "we will" to be more proactive. For example, the "make difficult decisions" is a negative formulation and seems to suggest that the outcomes will be, at best, the least bad option. A strategy should be a positive, forward looking document about what the sector can achieve,

therefore, although we must recognise the challenge of available resources against our ambitions, this should be reworded as a positive formulation such as “seek sustainable outcomes”.

The current ‘we must be prepared to make difficult decisions’ principle, which reflects resourcing challenges, is not carried through into the main text, e.g. there is no guidance or framework for making difficult decisions provided. Delivery of the strategy will force us to how assets are prioritised and where funding is targeted. It is important those involved in the historic environment are given guidance on how to make these choices. It could be argued that principles 5 and 6 could be combined.

Another example of a principle not being carried throughout the strategy is ‘we must care for our heritage assets’. This principle is not reflected as strongly as would be expected in the priorities or KPIs and we believe is a fundamental pillar. We are surprised that no KPI directly focuses on improving the condition of assets. Additionally, there is currently have no way of evaluating the current state of all Scotland’s assets.

The principle ‘we must care for our heritage assets’ should be expanded to include developing community relations around assets. We do not want to simply maintain assets in aspect but also utilise them to the benefit of the community, which will in turn lead to the assets being more relevant to people who will then want to care for and protect them.

16. We have identified three key priorities as the focus for delivery over the next five years. Do you agree with them?

The Trust agrees with the three key priorities as general headings – they are the familiar three pillars of sustainable development. These priorities echo Scottish Government priorities and will support the delivery of the priorities expressed in the Trust’s 10 year strategy ‘Nature, Beauty & Heritage for Everyone’ such as being carbon negative by 2031, championing traditional conservation skills and making heritage more relevant and inclusive.

The priorities could be enhanced by including specific, time-bound commitments to reflect the landscape in which it will be delivered e.g. recovery from Covid and economic aftershocks for the wellbeing economy theme.

17. Each priority has a set of outcomes expressed as Key Performance Indicators (KPIs) associated with it. Do you agree with these KPIs?

The Trust welcomes most of the KPIs in the document. To highlight a few, the Trust agrees KPI 2 is a crucial priority as we face more frequent extreme weather caused by climate change leading to challenges like flooding and erosion. We are also pleased to see the acknowledgement that the historic environment plays a crucial role in wellbeing in KPI 9.

The Trust has some comments in relation to specific KPIs, which we will outline below before making more general comments.

We support KPI 1 in recognition of the need for the sector to reduce emissions. The KPI’s success measure is *‘established a delivery mechanism for the historic environment sector to work together to contribute to Scotland’s net zero by 2030 target.’* We are unclear if the ‘2030 target’ refers to the

Scottish Government's target of 75% reduction in greenhouse gas emissions by 2030 or its target of net zero by 2045. The Trust assumes the measure refers to the target of 75% by 2030 but would appreciate clarity.

If the measure *does* refer to Scottish Government's 75% reduction by 2030 target, we would strongly suggest the KPI set a target date by which the delivery mechanism is established, for example, by 2025. The emissions reduction actions and the impact of these on government figures are going to take many years to deliver, meaning if the delivery mechanism is established too late there will not be enough time for it to meaningfully contribute to the 2030 target.

KPI 7 focuses on the economic contribution of the historic environment but the benefits the historic environment delivers are much wider than simply economic and the economic benefits should not assume primacy. The historic environment also offers wellbeing benefits. It is integral to our physical health and mental wellbeing as it provides space for exercise, connection and reflection. It also enriches peoples' lives, helping them so create a sense of belonging and social cohesion. KPI 7 should reflect this full range of benefits.

There should also be a KPI of 'increase the number of built heritage assets that are restored and cared for'. We already have the 'at risk' register, which provides a ready made baseline against which to measure the success of this KPI. A similar KPI for designed gardens and landscapes and greenspaces would also be welcomed.

The strategy and KPIs are heavily buildings-focussed meaning they fails to reflect the full breadth of historic environment. Other elements of the historic environment such as archives, battlefields, gardens and designed landscapes, and human-influenced natural heritage (such as farmed landscapes) are not reflected in the KPIs even though they are crucial in delivering against the three priorities (e.g. restoration and protection of the natural environment will play a key role in achieving Scotland's net zero goal and engagement with cultural touchpoints like battlefields and spaces for leisure like gardens are key to tourism and people's wellbeing).

Given the already wide scope of this strategy and timeframe to publication, there is a worry that the inclusion of new KPIs and actions to broaden out the strategy's focus would be 'add ons' instead of holistically incorporated. At the least, the Trust would be eager for the final strategy to explain how these elements fit with the historic environment, as well as an explanation of where they will feature if not in the Historic Environment Strategy.

The Trust also has concerns that:

- The KPIs and subsequent actions place a heavy burden on the shoulders of communities, individuals and smaller/voluntary organisations. Communities and individuals can only take on so much and may not want to take on responsibility for some assets. Looking after the historic environment still requires central support, initiatives and drive. The strategy should acknowledge and reflect this. Communities cannot be made to take something on they do not want to.
- The KPIs do not adequately focus on the re-opening and conservation of assets, which is what is important to communities.
- There is not enough focus on the care, repair and maintenance of assets.
- Many of our traditional materials are challenging and costly to source due to the fact they are no longer economically produced (lime, stone, good quality building timber, paint). This supply chain issue should be addressed through the KPIs.

- The necessary metrics and data to measure success for each KPI are not identified. This needs to be done- for example the success measure in KPI 5 could be through analysing how often the historic environment is mentioned in other sectoral plans. The Trust would welcome further information on how the measures will be developed and agreed upon. Data should come from a wider audience than professionals working in the historic environment sector and be accessible for a public audience.
- That the current formulation of the KPIs does not reflect what can be achieved through the strategy during the period of its operation by the strategy partners.
- That longer-term environmental changes which will be the product of actions by a wide variety of actors, including citizens and private owners, are better captured in the Scottish Historic Environment Audit which measures the overall health of the historic environment.
- The vital role volunteers play in protecting and caring for our heritage should be reflected more heavily in the KPIs and actions. Getting people engaged via volunteering will help them value the historic environment for the rest of their lives.

Finally, the Trust would welcome clarity on if the historic environment sector is expected to continue to deliver the OPiT KPIs and Working Group outputs in tandem with the KPIs and outputs from the new strategy.

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?

The Trust welcomes many of the national level actions. Some reflect the work we are already doing and our organisational priorities such as calling for a reduction in VAT; work to reduce emissions from heritage tourism visits; increasing diversity of voices across the heritage workforce and volunteer base; embedding heritage in planning, exploring options to make tourism more sustainable; and sharing the wellbeing benefits of heritage.

The Trust would welcome explanations of why the actions were chosen. We also believe many of the actions need further development to be SMART. In their current formulation, many do not have clear ways to measure success, are specific or have any detail on how and when they would be delivered. For example, the action on VAT reduction on KPI 1 does not specify:

- -by how much the reduction should be (the Trust believes it should be reduced to 0%);
- -what qualifies as advocacy (e.g. is the expectation a sustained advocacy programme or would sending a one off letter to UK Government fulfil the success measurement for this action?);
- -what advocacy actions will be delivered (e.g. MP engagement, public advocacy work, utilisation of UK or Scotland wide networks)

It is also unclear how the actions are going to be delivered. The delivery plan for each action needs to be detailed in the final version of the strategy. Given the timescale to publication this may not be feasible, in which case the Trust recommends the strategy is published alongside a commitment to consult on and publish a delivery plan by summer 2023. Without knowing how the KPIs will be delivered, it will not be possible to start working to achieve them therefore the delivery plan must be written as soon as possible.

KPI 1

We suggest that under KPI 1 there should be a national action to encourage maintenance by private owners. Most of the historic environment is in private ownership therefore incentivising maintenance is essential to achieving net zero. Private owners are not currently incentivised to maintain buildings because funding streams tend to support larger capital repair projects rather than everyday upkeep. Also, as there is no regulation on maintenance, many property owners (assets managers and individuals) do not practice preventative maintenance. They also do not know what they own or what condition it is in, meaning they do not have a clear idea of what repairs and maintenance is required. The construction supply chain, both advisers and operators, also needs to be upskilled.

The action to establish a carbon emissions baseline for Scotland's historic building stock will require organisations to take proper carbon baseline assessment but there's no standardised methodology to do this currently. It will also be important to ensure that organisations measuring their carbon emissions use the same methodology (e.g. ISO14001). Without this standardisation, we will not have a clear and robust picture of the sector's emissions.

The action on VAT reduction is welcomed but should specify a '0% VAT rebate'.

The Trust welcomes the action 'work to reduce emissions from heritage tourism visits' but this action is complex to deliver because it depends on national and local efforts that are not only in the gift of the historic environment sector-. For example, it will require nationwide EV infrastructure investment and local installation of charging stations to support EV usage. We suggest this action should be modified to focus on identifying how this work could be delivered (e.g. what mechanisms need to be in place, how buy in would be secured, how investment would be secured and what national co-ordination needs to take place). We suggest modifying it to 'identify how emissions can be reduced from heritage tourism visits' or similar.

Some of the local actions under KPI 1 are delivered via other national strategies and are therefore duplicated elsewhere. This strategy should help make the connections rather than duplication.

KPI 2

We welcome the ambition to roll out the Traditional Buildings Health Check across Scotland but this action should be SMART.

Delivery of the local action 'create and publish a climate adaptation plan for the historic environment assets you care for' will require national guidance, signposting and support, for example, signposting communities in Highland Local Authority to Highland Adapts, a council led project that supports communities to put in climate adaptation plans. This should be reflected in the national action list.

KPI 3

Many of the actions are about conducting reviews and evaluations as well as exploring opportunities and developing plans. This is particularly evident for the actions under KPI 3. The Trust would welcome a more proactive strategy focussed on delivery. For example, under KPI 3 there is an action of 'revise and expand the sector Skills Investment Plan to identify the opportunities and actions needed to create a sustainable skills ecosystem, and to provide the green skills needed to support the historic environment's net zero transition'. The Trust argues this work has been done through the Skills Investment Plan and other work such as the review of stonemasonry. Instead of reviewing

the skills gap further, this strategy should be delivering against previous research into skills needs and gaps. Following the work during the previous strategy, we now need to put the actions identified in the Skills Investment Plan into effect.

Many of our traditional skills bases are in crisis, such as stonemasonry and heritage gardening. Despite initiatives to raise awareness there are fewer local colleges offering relevant courses and fewer training opportunities for people wishing to learn trade and craft skills and as a result there is no clear connected national strategy for the sector. The continuing lack of specialist trade/craft/relevant professional skills presents substantial risk to organisations like the Trust which have high numbers of traditional and historic buildings and heritage gardens and designed landscape demanding such skills. This KPI should address these dual issues of demand and supply.

KPI 5

The actions in KPI 5 are welcomed but they should not be contained to one KPI, instead they need to be woven through the strategy, particularly the actions around proving advice and guidance and hearing a diversity of voices.

Our grant success criteria are diverse and complicated meaning major project grants generally go to well resourced recipients. KPI 5 has an action of 'we will ensure grant programmes and funding have positive, community-focused outcomes and objectives'. The Trust would welcome further information on how this will be achieved given the current landscape.

This KPI also needs to address the fact that some communities have historically been left out of the narrative and/or been made to feel unwelcome and so will be reluctant to engage. The 'ensuring a diversity of voices' action must include a commitment to address structural barriers (e.g. economic barriers) to participation for certain groups of people.

Our national data sets that support the historic environment are disparate and do not contain enough depth of data (e.g. we do not have data on the local condition of A listed buildings). Our colleagues who are involved in natural heritage management benefit from national data sets that allows habitat condition and species risk to be easily articulated and shared at national and local levels. Communities interested in the historic environment need comprehensive, easily understandable data to communicate and make decisions effectively. We believe there should be effort in creating, improving and sharing national data sets.

KPI 6

The actions on engaging young people are not reflective of the demographics the strategy wants to reach and sound like they have been written 'for' certain demographics not 'with' them. Arguably, this KPI could be broadened to address lack of representation for people more generally.

There should be an action under KPI 6 about making the historic environment more relevant to people, as doing this would naturally increase participation, interest and care. Only through feeling that the historic environment is relevant will people feel engaged, care more about and want to protect it.

KPI 7

The Trust would welcome a definition of 'responsible'. 'Sustainable' may be a better ambition, and we already have agreed definitions of sustainable development.

There is a lack of public understanding heritage jobs are green jobs. Carbon was already expended when assets were built, and our built heritage holds much carbon. Therefore, the Trust believes it is essential to maintain built heritage to protect embodied carbon. This is much more environmentally sustainable than building from new. Maintaining built heritage also helps establish and maintain local supply chains and uses more local materials.

KPI 9

To get people to engage with heritage, we need to demonstrate the benefits of doing so. Knowing and experiencing your heritage can help create a sense of identity, community and belonging. Accessing heritage sites can provide opportunities for improving physical health through exposure to environments that encourage walking, cycling etc and through the opportunity to try new skills. Heritage can also help improve mental health. Volunteering in the heritage sector is also highly beneficial. A volunteering project run in Manchester found that “75% of volunteers reported a significant increase in wellbeing after a year, and 60% reported sustained wellbeing for 2-3 years afterwards” it also found that “30% of volunteers soon found employment as a result of skills gained, which is itself a key determinant of wellbeing.” (Heritage Alliance Heritage, Health and Wellbeing 2020). There should be an action under KPI 9 around raising awareness of these benefits.

The action about Make Your Mark should be expanded to include a commitment to improving accessibility to volunteering opportunities.

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?

The Trust has set out its overall comments on the local/regional level actions below:

- Those delivering the local actions are likely to have limited resources to deliver the lengthy number of actions. The Trust has received feedback from smaller organisations that the action list is overwhelming. One way to tackle this would be to prioritise the actions, perhaps pulling out a ‘most important’ one under each KPI that communities, individuals and smaller/voluntary organisations could focus on delivering.
- We anticipate that there may be more regional and local partnerships forming to help deliver actions, which we very much welcome. The strategy should therefore consider how such joint action can be encouraged and supported, and the outcomes reported on and shared, without attempting to manage from the centre.
- Lots of these actions expect organisations to do the ‘right’ thing but doing the ‘right’ thing would cost more. This is a big and sometimes impossible ask of communities, individuals and smaller/voluntary organisations.
- It would be helpful if the strategy could detail how it will help communities leverage funding and clarify if demonstration of achievement of actions and KPIs will impact on the success of grant applications.
- Many actions will be difficult for communities to deliver as they require subtle interventions and skill. This is particularly relevant for KPI 2- for example, not many individuals, communities and few smaller /voluntary organisations will have the knowledge, expertise or resource to ‘create and publish a climate adaptation plan for the historic environment assets you care for’. This gap between expectation and ability to deliver may make the strategy feel patronising towards communities.

- The actions often use language and phrases that may be inaccessible to people and therefore put them off using the strategy and engaging with the historic environment. The Trust also feels many communities, individuals and smaller/voluntary organisations simply will not have the funding/resources/skills/people/capacity to deliver the actions. For example, under KPI 4, the phrases ‘continuous professional development’ and ‘targeted training provision’ are technical and actions like ‘undertaking a skills audit’ and ‘developing succession’ plans are unrealistic asks for many communities, individuals and smaller/voluntary organisations.
- The Trust supports the inclusion of regional/local actions but realising these will require central coordination, guidance and support. For example, what about if there is no community interest safeguarding objects that are valued from a heritage aspect?
- There should be an action around protection of our intangible heritage, for example, stories from people who used to work or use historic buildings and gardens and designed landscape.

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

During delivery of OPiT a lack of formal funding to deliver the working groups’ conclusions meant only those projects for which organisations could spare time and resources for were delivered, rather than those projects which have collectively been deemed a priority. This should be rectified for the delivery of the new strategy.

There must be proper resource to support working groups (including ability to recruit appropriate members, a secretariat to allocate responsibility and oversee delivery of outputs, and adequate funding). There should also be a mechanism in place to join up the different working groups.

The Trust welcomes the regional/local delivery model as this creates buy in from this level and fosters a sense of ownership. To successfully delivery the model it is essential there is adequate central support in the way of support and advice (e.g. provision of expertise and skills to help people fill out planning applications), additional resource where needed (e.g. on the ground support to form community partnerships), and funding. There also needs to be established mechanisms through which these can be delivered. Some proposed delivery mechanisms that could be incorporated are:

- a central portal for advice;
- having senior HES staff working in local areas to deliver the strategy;
- sending project officers into different areas to build capacity and support local groups;
- and sending centrally-based HES staff out into regions to promote good working practices.

The Trust is also aware of community networks it would be useful to signpost to those delivering the local/regional actions (for example):

- Heritage Trust Network <https://www.heritagetrustnetwork.org.uk/>
- the Scottish Communities Climate Action Network’s (SCCAN) network of climate hubs, which are regional hubs supporting communities in climate action. SCANN also has regional networks <https://sccan.scot/network-building/>
- the Outer Hebrides Community Planning Partnership <https://www.adaptationscotland.org.uk/get-involved/our-projects/adaptation-outer-hebrides-community-planning-partnership-led>

Without investing in the delivery mechanisms the regional/local delivery model risks simply become a way by which responsibility is foisted on communities, individuals and small/voluntary organisations without empowering them. Having national presence in communities and at a regional level will also pre-empt the risk of disconnect between national and local/regional priorities and delivery.

The strategy should also state how regional/local actions will be coordinated and captured at a national level. The Trust also believes that transparency should underpin the delivery structures and mechanism. All papers should be made public, including working group minutes, and be held in one place.

A concern with OPiT was the lack of diversity of working groups and input from those who do not work directly in the historic environment sector. To ensure this strategy is effectively delivered and the challenges and resources identified etc, the working groups need to be more inclusive. This will involve recognising and actively addressing challenges such as smaller organisations and communities not having the time to engage (which reflects a wider local v national resource issue) and structural barriers to engagement.

The previous iteration of the strategy had only limited participation from local authorities, who are crucial partners in the delivery of strategy objectives. A shift to local and regional partnerships may help better engage local authorities, along with more granular, specific actions. Local authority participation can be expected to be focused on their own priorities, and the strategy will need to be addressing these to be relevant. However, we will still need a good model of national/local delivery and information sharing.

On governance, the senior strategy layer, SHEF, used to be chaired by the Cabinet Secretary which gave members direct access to Ministers. We recommend the new national delivery mechanisms maintains this access to government, if not through SHEF, through another mechanism. One relevant example is the Heritage Council in England, which brings together government and sector partners, along with Ministers (<https://www.gov.uk/government/groups/heritage-council>), helping ensure historic environment concerns and ambitions are mainstreamed.

Finally, the Trust welcomes the review and reformatting of the CEO group. This should include the agenda having group input and more time for discussion, which would help increase a feeling of shared ownership amongst participants.

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?

Small community groups are being put at centre of delivery, but they are unlikely to respond to the consultation because they are unaware of it or do not have the capacity to respond. Communities tend to take on buildings because they are interested in them. They struggle with finances, putting in sustainability measures, and resource to deliver. They do not have capacity to go to working groups or annual conferences and the delivery model should commit to finding solutions to this.

As stated in the answer to the previous question, to ensure successful regional delivery, the strategy must acknowledge and address the fact that those delivering regional/local actions will require central support and leadership. Those delivering regional/local actions will need help applying for grants, creating partnerships, legal agreements, planning guidance, funding to acquire the necessary

resources, access to a skilled workforce to deliver projects, etc. This must be provisioned for at a central level (although it should be delivered at a local/regional level).

The Trust believes the strategy should also acknowledge that there will be tensions over what local/regional communities, organisations and people and national organisations think should be prioritised, and that the final version should help us decide how to resolve these tensions (this is another example of where the 'make difficult decisions' principle is not reflected).

The strategy should also accept that what is prioritised locally or regionally may vary across the country, while still using the strategy delivery structure as a coordination and information sharing mechanism.

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.

Many elements of the strategy will be delivered by the nature of the Trust's work therefore we may be interested in sitting on the working groups to transfer views and knowledge on topics such as volunteering, skills, climate, prioritisation as we have previously done via the OPiT groups. For example, we would welcome being given the opportunity to be involved re the skills group in the area of gardens and designed landscapes

We would also be interested in maintaining a presence in strategic level groups such as the CEO Forum.

27. Do you have any final comments on the draft strategy?

The aim of the strategy is to engage communities, but the language used is, at times, inaccessible. It is unclear for people outside the sector (as well as to many in it) what 'historic environment' means. The Trust has discussed with those in the sector the difficulty in creating an alternative term to describe the historic environment, but if changing the terminology is not feasible, at the very least the strategy needs to better describe the historic environment to the target audience.

The strategy should also be re-named to differentiate itself from Historic Environment Scotland's own strategy. The Trust has had feedback that the similar names create confusion, indeed some respondents thought they were reading Historic Environment Scotland's own strategy not a strategy for the sector.

The strategy will only be used by communities, individuals and smaller/voluntary organisations if it is relatable and understandable to them. The current name means there is a high risk of people not being aware that this strategy is for them.

More broadly, the language can feel patronising to those tasked with delivering the local/regional actions and is at times negative. This strategy should be an opportunity to celebrate the historic environment and set out an ambitious, positive vision for the future of the historic environment. We would welcome re-wording of the strategy to create a more positive, aspirational and collaborative tone which motivates those involved in the sector.

The beginning of the strategy describes the historic environment as built heritage, as well as monuments, gardens and designed landscapes, battlefields, MPAs, NSAs, NNRs and National Parks, yet these are either never or barely mentioned again. For example, battlefields are mentioned under the Priority 1 and 2 descriptions but not in any KPIs or actions, and gardens are not mentioned once.

The strategy also does not include archives in its definition of the historic environment yet archives are essential to interpret our buildings and monuments.

Scotland's built heritage is valued but assets in good condition are generally taken for granted and only talked about when damage occurs or an asset is closed off. People do not understand the risks to built heritage, their role in caring for them or the benefits they bring. Partly this is because the language used around built heritage assets is non-emotive. The language in new strategy does help make this emotional connection to built heritage assets and this will help ensure people are motivated to care for them.

The Trust also feels it is important for the strategy to address the chronic lack of strategic funding in the sector. This needs to be acknowledged at the start of the strategy so readers fully appreciate the landscape in which the strategy will be delivered.

Finally, the Trust feels it is important to raise that the strategy may be seen contradictory and not reflective of local realities as it asks communities, smaller/voluntary organisations and individuals to deliver actions locally whilst many Historic Environment Scotland sites remain closed. Recent feedback from community member to the Trust highlighted a lack of engagement from Historic Environment Scotland over site closures, which have affected the local economy and denied visitors and locals alike access to these cultural heritage sites. This incongruity may make people question how they could deliver the local/regional actions with their limited resources when it's not possible to keep public historic environment assets open.