

Heritage For All: Historic Environment Scotland Corporate Plan 2025-28

**Final Business and Regulatory Impact Assessment
– March 2025**

Introduction

Historic Environment Scotland (HES) is the lead public body for the historic environment in Scotland. [The Historic Environment Scotland Act 2014](#) requires HES to prepare a corporate plan and have it approved by Scottish Ministers at the start of each 3-year planning period.

The Corporate Plan is a high-level document that sets out HES's vision for the historic environment, its strategic priorities and intended outcomes over the period 2025-28. It details how HES will approach its statutory functions and implement [the National Strategy for the Historic Environment](#): Our Past Our Future (OPOF), aligning with the Programme for Government and National Performance Framework.

The Plan does not seek to make changes to the overarching regulatory framework set out in the Act, or the wider suite of existing regulations which relate to the historic environment as detailed in the HEPS (Historic Environment Policy for Scotland). However, through its actions it does seek to shape and improve the environment in which Scottish businesses operate. Given the scale and breadth of links between the historic environment and other economic sectors ([detailed in the 2023/24 OPOF Annual Report](#)), it is therefore appropriate to seek the views of businesses and complete a BRIA detailing the potential effects of the HES Corporate Plan on their operations and competitiveness.

Executive summary

Issue and why it needs to be addressed

Historic Environment Scotland (HES) is the lead public body for the historic environment in Scotland. [The Historic Environment Scotland Act 2014](#) requires HES to prepare a corporate plan and have it approved by Scottish Ministers at the start of each 3-year planning period.

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Intended outcomes

HES's purpose, as set out in the Corporate Plan, is:

To investigate, care for and promote Scotland's historic environment for the benefit of people and communities everywhere.

To this end, the final Plan sets out 10 outcomes structured under 5 priority themes:

Theme: Scotland's Heritage

- We will have increased investment in the heritage assets in our care
- We will have provided inspiring and memorable visitor experiences
- We will have enabled good decision making for Scotland's protected places

Theme: Skills & Learning

- We will have inspired a new generation of learners through our skills and outreach programmes

Theme: People and Places

- We will have increased the economic and community benefits from Scotland's historic environment
- We will have sustained our grant funding to ensure the historic environment delivers against national priorities

Theme: Climate Action

- We will have led the way in reducing our climate impacts
- We will have made Scotland's heritage central to the just transition to net zero

Theme: Our Organisation

- We have increased our income and invested it in Scotland's heritage

- We will have provided a safe, secure and inclusive environment in which our colleagues can thrive.

It should be noted that the draft Corporate Plan that was used as the basis for consultation used variations of these outcomes, but structured under the same 5 priority areas. The final outcomes were refined based on feedback from the public consultation and impact assessments.

Options

1. Proceed without a Plan
2. Extend the current Corporate Plan
3. Produce an updated Corporate Plan (the statutory requirement)

In practice, producing a new Corporate Plan is the only viable option. There are however options around the content of the Plan.

HES has produced a series of Corporate Plans since it was established in 2014. It is not a discrete one-off process or decision, but the culmination of on-going engagement and evolution within the organisation and across the sector. The long-standing principles set out in the 2014 Act, and long-term mission from the National Historic Environment Strategy give a degree of continuity around the main themes, while the shifting political and financial environment shape the key outcomes and their relative priority.

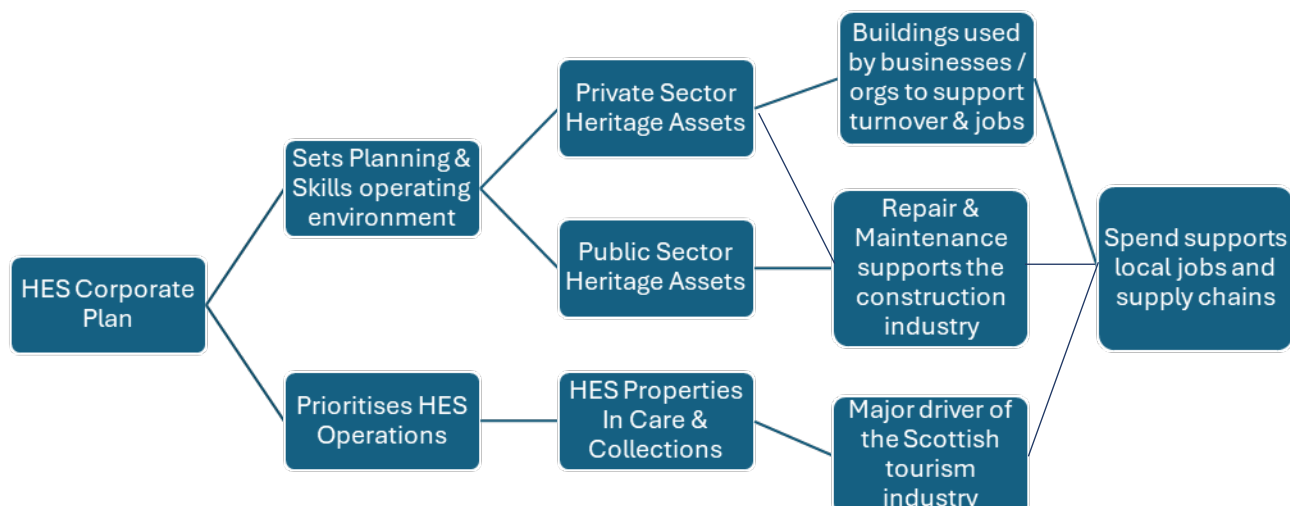
The draft Corporate Plan produced for consultation presented a single set of priorities and outcomes, seeking general feedback, rather than offering discrete options for respondents to choose between. The findings from this consultation shaped a set of revised outcomes.

Sectors affected

The historic environment is not a discrete sector but embedded across multiple sectors and policy areas. It affects their asset base, supply chain and the demand for their goods and services. HES's activities drive the demand for in-year expenditure with businesses, particularly in the tourism and construction sectors, and shapes the future investment pipeline for public and private sector asset owners and decision makers, providing continuity and a longer-term stable operating environment.

The key groups and sectors affected by the plan include:

- Existing HES suppliers, £45m in 2023/24 across over 1,000 businesses
- Directly funded businesses and organisations, £14m p.a.
- Construction sector, £3.8 Bn of repair & maintenance spend in 2023
- Tourism sector, £2.2 Bn of heritage-led tourism expenditure
- Any business/organisation operating from a historic building (20% of Scotland's building stock) or relying on Scotland's international reputation for inward investment.



Engagement completed

The following table summarises HES’s approach across each stakeholder group:

Stakeholder group	Existing link or network	Themed group workshop	Public consultation	Discrete survey work	Sector data
Scottish Government	Y	Y			Y
Other public sector	Y	Y	Y	Y	
Business / third sector	Y	Y	Y		Y
General public			Y		
Other (small firm impact test for BRIA)				Y	Y

Anticipated impacts and mitigating actions

The BRIA has not identified any significant business or regulatory concerns relating to the 5 strategic themes included in the draft Corporate Plan.

Businesses consulted have noted that the draft Corporate Plan they reviewed is “aspiration not information” and as such it is difficult for them to fully identify possible concerns and opportunities. However, they rated the plan as either positive or neutral for their prospects overall, and welcome the partnership approach, communication channels and more detailed Annual Operating Plan and themed plans that HES produces. The Corporate Plan is seen to be well aligned with key stakeholder sectors’ own aspirations to develop and use heritage more sustainably and acknowledge the wider risks and opportunities this transition could introduce.

No significant risks have been identified through the series of regulatory and statutory compliance tests:

Test	Overall impact	Risk level
Scottish firms’ international competitiveness	Positive	Low
Small business impacts	Positive	Low
Investment	Neutral	Low
Workforce & Fair Work	Positive	Low
Climate change / circular economy	Positive	Low

Competition assessment	Neutral	Low
Consumer duty	Neutral / negative	Low
Regulatory alignment	Neutral	Zero
Legal aid	Neutral	Zero
Digital impact	Positive	Low

No immediate mitigating actions or exclusions are required.

Recommendations/ implementation plans

Proceed with the publication and implementation of the new Corporate Plan, in accordance with the statutory requirement of the Act.

When introducing and implementing the Plan, HES should:

- Maintain good communication channels around the development and implementation of specific policies, projects and investments that will affect the pool of sector stakeholders identified in this BRIA;
- Acknowledge the possible conflict between the heritage sector's reliance on visitor-driven commercial income and the need for a sustainable tourism approach which requires reduced visitor carbon footprints and accommodates local social requirements which may reduce the commerciality of sites and attractions;
- Work with the construction industry to ensure that any new guidance and training requirements will not exclude existing providers without corresponding support.
- Acknowledge the risk of competition between providers within the heritage sector for common funding and for visitor expenditure.
- Recognise the importance of Edinburgh Castle to the national tourism industry, and that the quality of visitor experience needs to match the ticket price to protect Scotland's overall perceived value-for-money offer which is increasingly challenging. However, this does not preclude price increases as long as they are matched by corresponding investment or innovation.

Evaluation and monitoring of implementation

A full monitoring framework has been developed with key performance indicators (KPIs) for each outcome and will be included in the published Plan. The indicators draw from a range of partners and public data sources to ensure sufficiently comprehensive coverage.

The Corporate Plan is a high-level 3-year document. It is supplemented with Annual Operating Plans, which include the detailed actions HES is taking each year towards the objectives in the Corporate Plan.

Performance tracking against the KPIs is reviewed quarterly by HES's Executive Leadership Team and Board and shared with the Scottish Government. Annual progress is published in HES's Annual Report & Account.

Section 1: Background, aims and options

Background to policy issue

National Historic Environment Strategy context

A range of individuals, businesses, charities, industries and activities make use of and rely on Scotland's historic environment. In some cases, there are multiple and potentially competing uses of the same areas. Scotland's historic environment contains a wide variety of important, unique and irreplaceable features, and provides a range of valuable goods and services.

However, ownership, decision-making and funding in relation to Scotland's historic environment is diffuse, meaning that management of the historic environment is complex. There is a risk that decisions may be made in isolation from one another and that the historic environment may be mismanaged and damaged, with consequences for the goods and services it provides. This could also increase costs and uncertainty for businesses, developers and other historic environment activities, undermining the efficient use of Scotland's historic environment.

[The National Strategy for the Historic Environment](#): Our Past Our Future (OPOF), was collaboratively developed to set a common mission for all key partners and historic environment decision-makers: *To sustain and enhance the benefits of Scotland's historic environment, for people and communities now and into the future*. While the strategy is collectively owned, Historic Environment Scotland (HES) is the lead public body responsible for producing, implementing and monitoring it.

The Historic Environment Scotland Act and statutory Corporate Plan requirement

HES is a public body any charity with a series of statutory duties. In addition to the lead role for the National Historic Environment Strategy, [The Historic Environment Scotland Act 2014](#) gives HES the following functions:

- (a) identifying and recording the historic environment;
- (b) understanding and interpreting the historic environment;
- (c) learning about, and educating others about, the historic environment;
- (d) protecting and managing the historic environment;
- (e) conserving and enhancing the historic environment.

HES also has the function of managing its collections as a national resource for reference, study and research. In particular:

- (a) preserving, conserving and developing its collections;
- (b) making the collections accessible to the public and to persons wishing to carry out study and research;
- (c) exhibiting and interpreting objects in the collections.

[The 2014 Act](#) states that "Historic Environment Scotland must, before the beginning of each planning period, prepare a corporate plan and submit it for approval to the Scottish Ministers. The corporate plan must set out: (a) Historic Environment Scotland's main objectives for the planning period, (b) the outcomes by reference to which the achievement of the main

objectives may be measured, and (c) the activities which Historic Environment Scotland expects to undertake during the planning period”.

Purpose/ aim of action and desired effect

HES's purpose, as set out in the Corporate Plan, is:

To investigate, care for and promote Scotland's historic environment for the benefit of people and communities across the country.

The key aim of the Plan is to set out HES's strategic direction from 2025 to 2028. It details how HES will approach its statutory functions and implement [the National Strategy for the Historic Environment](#): Our Past Our Future (OPOF). It also accounts for the policy directions set out in the Scottish Government's Spending Review; the Programme for Government and National Performance Framework; the Cabinet Secretary for Constitution, External Affairs and Culture's statement of priorities for his portfolio; and the HES Board's views.

The Corporate Plan does not seek to make changes to the overarching regulatory framework set out in the Act, or the wider suite of existing regulations which relate to the historic environment as detailed in the HEPS (Historic Environment Policy for Scotland). However, it does seek to shape and improve the environment and markets in which people and businesses operate.

The draft Corporate Plan which was used for the public and business consultations to inform this BRIA identified key priorities and outcomes to ensure that HES is focussed on delivering the agreed purpose. The 5 priority themes and their corresponding outcomes were:

Scotland's Heritage

- Outcome 1: We will have built strong foundations for the long-term future of the properties, collections, records and archives in our care.
- Outcome 2: We will have the right evidence to inform policy and decision making.
- Outcome 3: We will have developed advice and guidance to support people seeking to reuse existing buildings.

Skills and Learning

- Outcome 4: We will have improved pathways across Scotland for key historic environment skills.
- Outcome 5: We will be a sector leader for delivering heritage skills.
- Outcome 6: We will have made Scotland's historic environment a valued national resource for lifelong learning.

People and Places

- Outcome 7: We will have increased and broadened our contribution to a growing Scottish economy.
- Outcome 8: We will have used our grants and influence to build a more resilient historic environment sector.
- Outcome 9: We will have developed authentic and memorable visitor experiences at the properties in care.

Climate Action

- Outcome 10: We will have reduced carbon emissions from historic environment assets across Scotland.
- Outcome 11: We will have supported Scotland's historic environment to adapt to the changing climate.

Inclusion and Resilience

- Outcome 12: We will have generated the financial resources to deliver our priorities.
- Outcome 13: We will have cultivated the environment for a safe and welcoming workplace.
- Outcome 14: We will have made our work and services accessible to everyone in Scotland.

The [National Performance Framework](#) provides a means to measure the Government's success in achieving its priorities. It comprises 11 national outcomes that underpin the Government's Purpose: *To focus on creating a more successful country with opportunities for all of Scotland to flourish through increased wellbeing, and sustainable and inclusive economic growth*. It provides a performance framework for measuring success against the Government's strategic priorities.

HES's Corporate Plan will include a performance framework which demonstrates the alignment of HES's outcomes with those set out in the NPF. Performance will be tracked and published annually against each outcome. Note: the performance framework was not included in the consultation draft of the Corporate Plan, so there is no direct business feedback on it.

Options

HES has produced a series of Corporate Plans since it was established in 2014. It is not a discrete one-off process or decision, but the culmination of on-going engagement and evolution within the organisation and across the sector. The long-standing principles set out in the 2014 Act, and long-term mission from the National Historic Environment Strategy give a degree of continuity around the main themes, while the shifting political and financial environment shape the key outcomes and their relative priority.

The selection of options for this planning cycle have therefore built on the experience of previous plans which have achieved the required Scottish Government approval.

Options around Corporate Plan length and level of detail

Option 1: Doing nothing (no Corporate Plan in place) – this implies HES will try to deliver its agreed functions without a formal declaration of our approach. This is not a viable option as production of a Plan is a requirement of the Act and HES's framework agreement with Scottish Ministers.

Option 2: Retain and extend the existing Corporate Plan. The existing plan addresses the long-established principles set out in the 2014 Act. However, the operating environment has changed significantly since the current plan was approved, affecting HES's priorities and ability to deliver its objectives. Key changes include:

- Financial capacity: HES has a new business model which formally decreases public funding over the next 5 years.
- National policy objectives: The Scottish Government has refreshed the National Performance Framework which HES is required to align with.
- Sector Policy objectives: a new National Strategy for the Historic Environment has been launched (Our Past, Our Future has replaced Our Place in Time).
- Key new stakeholders: the sector has a new Minister, and HES has a new Chief Executive and new Board members whose views must be accounted for.

It should be noted, however, that several headline themes and outcomes from the existing Corporate Plan have been carried over, reflecting the long-term mission of the sector and long-established key issues and pressures.

Option 3: Produce a new corporate plan. This is the legally required option, so must be delivered. Previous public consultations (and BRIAs) have explored the length and level of detail required in the Corporate Plan to balance:

- Accessibility: a high-level document which reaches the broad sector stakeholders and the wider public with key messages, but without being too over-bearing, is key to achieving the required scope of buy-in;
- Specific detail – many stakeholders are keen to see full details of specific investments and grants allocations so they can shape their own plans accordingly.

The draft Corporate Plan offered for consultation follows the established route of the last decade in terms of length and level of details provided. It includes the key priority themes, outcomes and actions, but is not an exhaustive list of HES's full anticipated spending plans and activities over the 3-year period. HES has also committed to produce a series of annual operating plans and discrete strategies for individual priorities, plus access to HES's network of staff, to offer the best route for people seeking more specific detail.

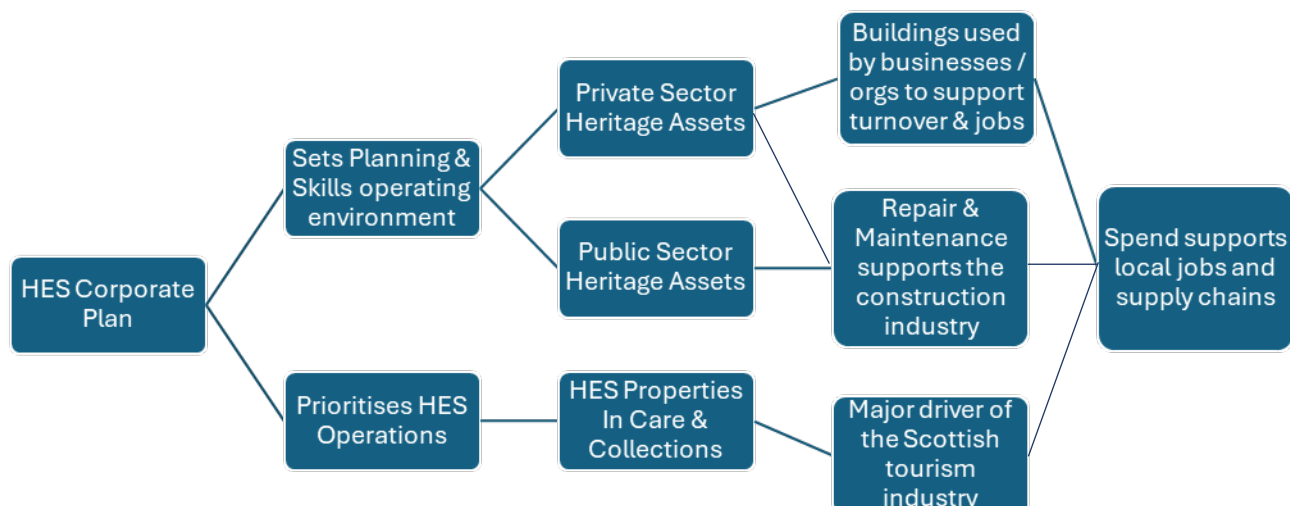
Content Options

The content of the draft Corporate Plan offered for consultation was developed by an in-house team through an iterative process, balancing the national and sector policy direction with the views and delivery capabilities of each team within HES. The draft for consultation was approved by the Executive Leadership Team, the HES Board and the Scottish Government sponsor department prior to circulation.

The draft plan for consultation presented a single set of priorities and outcomes, seeking general feedback, rather than offering discrete options for respondents to choose between.

Sectors/ Groups affected

The historic environment is not a discrete sector but embedded across multiple sectors and policy areas. It affects their asset base, supply chain and the demand for their goods and services. HES's activities drive the demand for in-year expenditure with businesses, particularly in the tourism and construction sectors, and shapes the future investment pipeline for public and private sector asset owners and decision makers, providing continuity and a longer-term stable operating environment.



The following baseline information summarises the groups of businesses that are currently affected by HES’s investment, expenditure and regulatory activities. It also highlights potential areas of risk or opportunity for these business groups in relation to the delivery options for the Plan.

Existing HES suppliers

- HES spent £45 million with suppliers in 2023/24, of which £33 million (74%) was with suppliers based locally in Scotland (or non-Scottish companies delivering the service from their Scottish distribution centre). This expenditure supported over 1,000 businesses.
- £19.7 million (44%) was spent with micro and small businesses spanning all Scottish Local Authority areas. Research completed pre-COVID and during the COVID response showed that HES is the sole or major source of income for many of these small companies, without which they would likely go out of business.
- Including the subsequent supply chain effects, HES’s total supplier impact is estimated at £80 million, 85% of which (or £68 million) is based in Scotland. This impact is estimated to support over 1,200 FTE jobs across the UK, 1,000 of which are based in Scotland.
- The introduction of the Plan is expected to safeguard this activity, or potentially grow it through increasing commercial income and fundraising available for expenditure..
- The main risk to this group is any reduction in HES expenditure through either an unanticipated reduction in core grant, or failure to achieve the projected levels of non-government income. There may also be a redistribution effect between businesses and regions depending on which Properties in Care (PICs) and projects HES’s invests in over the 3-year cycle.

Directly funded businesses / organisations

- HES distributes £14.5m in grant funding per annum across a range of businesses and other sector stakeholders. In particular, the Build Environment Forum for Scotland, Archaeology Scotland and the City Heritage Trusts receive the majority of their income from HES grants.

- Grant recipients support local businesses through their expenditure. Depending on the nature of the projects supported, the economic return is often up to 5 times the value of the initial grant in addition to wider social and heritage conservation benefits.
- This grant level is ring-fenced funding, so the overall effect on businesses should experience little or no change following introduction of the Plan. However, the pool of individual businesses receiving grants will change in line with the applications received and approvals given. There will therefore be some redistribution in the composition of grant recipient businesses based on their fit with the Plan's strategic objectives.

Construction businesses

- HES shapes the operating environment for investment in all of Scotland's heritage assets through its regulatory and planning function, technical research into repair, maintenance and adaptation methods, direct construction industry training provision and strategic partnership role with major funders informing their investment plans.
- The Scottish Historic Environment Audit (SHEA) estimates that total spend on repair and maintenance of the historic environment was £1.9 billion in 2023, supporting businesses in construction and affiliated industries. Including supply chain effects, this increases to £3.8 billion, supporting an estimated 28,000 FTE jobs.

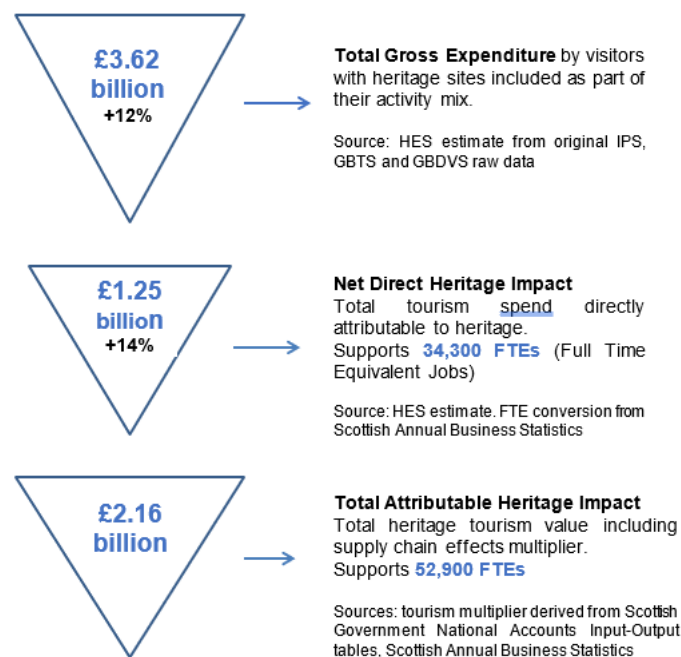
Sub-sector & funder	2023, £ million		FTE jobs supported inc. supply chain
	Construction output	Including domestic supply chain	
Pre-1919 Housing			
Public sector	£302	£602	4,507
Private sector	£955	£1,904	14,253
Total housing	£1,256	£2,504	18,746
Non-housing infrastructure			
Public sector	£375	£748	5,597
Private sector	£301	£600	4,492
Total non-housing	£676	£1,348	10,089
Total investment in pre-1919 assets			
Public sector	£677	£1,350	10,104
Private sector	£1,255	£2,502	18,731
Total direct investment	£1,932	£3,852	28,835

- Introduction of the Plan is intended to sustain and grow this sector impact by:
 - ensuring efficient delivery of HES's statutory duties around planning, which should safeguard these businesses or increase the rate at which expenditure can take place;
 - improving the skills available to the industry (Outcome 3: we will have produced more lifelong learning and skills development opportunities); and
 - shaping asset owners/managers long-term investment priorities around traditional building use and climate conversion (Outcome 6: we will have worked with partners and communities to deliver wellbeing and placemaking benefits from heritage and Outcome 7: we will have met our climate targets to support Scotland's just transition to net zero).

- The risks to this group of businesses relate to any difficulties in the implementation of the strategy and rate at which HES can process direct planning applications. This could potentially slow the rate of approvals, and thus delay expenditure with construction businesses.

Tourism businesses

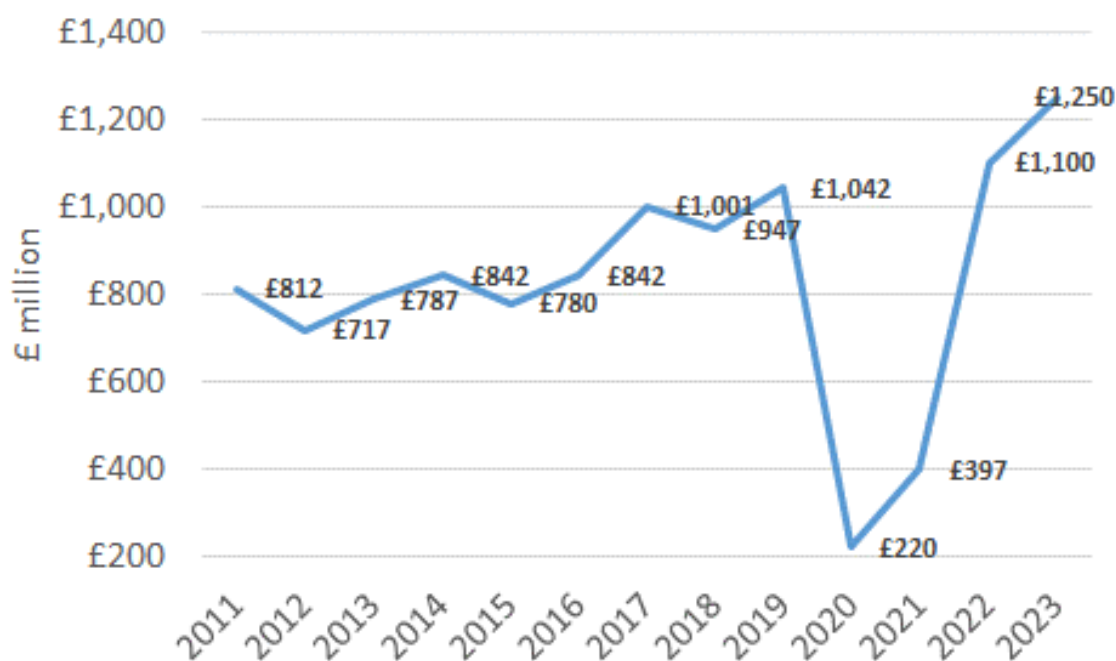
- Heritage drives Scotland's tourism economy. The majority (70%) of European and International visitors state history and culture is their motivation for choosing Scotland (source: VisitScotland). These overseas groups stay longer and spend more than domestic and day-visitors, driving spend with local businesses. Visitors who include a heritage attraction as part of their trip spend over £3.6 billion with Scottish businesses in 2023. (Data for 2024 will be available in summer 2025).
- HES estimates that heritage tourism in 2023 was worth net £1.25 billion to Scotland, increasing to £2.16 billion when supply chain effects are added. This represents the share of total visitor spend that would otherwise be lost to local businesses if heritage attractions are not open and available. Of this total, just under £1 billion (44%) is estimated to be attributable to the Properties in the Care of Scottish Ministers that are managed by HES, most notably Edinburgh Castle.



- This expenditure supports an estimated 52,900 FTEs across Scotland, spanning a range of businesses including hotels, retail, restaurants, transport providers and other attractions. The Plan proposes to match the wider tourism industries ambitions for sustainable delivery and growth (Outcome 1: we will have developed a more sustainable and inclusive approach to managing the properties, collections, records and archives in our care; Outcome 4: we will have increased the economic benefits from the historic environment) with the needs of local communities (Outcome 6).
- The risks to this group of indirectly supported tourism businesses relate to HES's ability to keep the Properties in Care in a condition which allows them to be open to the public, with the appropriate level of interpretation, facilities and promotion to match Scotland's

ambition to be a competitive international destination. This will be dictated by the level of income that HES achieves and the choice of sites for transformational investments. The effect of mandatory COVID closures serves to illustrate the worst case potential risk of major sites closing, where impact dropped over 80% in 2020 (closures were not introduced until March so some impact remained for the year accrued in the first quarter).

Graph 1: Heritage Tourism Impact Trend, 2011 – 2023 (net direct impact)



Other sectors owning and using heritage assets

- Many businesses and organisations operate from historic buildings and are responsible for their repair & maintenance (and consequently conserving the historic environment) even if their motivation for doing so is not conservation. These businesses are therefore affected by the planning environment and statutory requirements for listed buildings set out in the Historic Environment Policy for Scotland (HEPS), and indirectly affected by HES's activities to improve the skills supply and technical innovation to meet their needs and continue their operations.
- Around a fifth of Scotland's non-residential spaces are based in buildings which include a pre-1919 element, which is often used as one definition of a historic building. However, there are many historically significant buildings listed and scheduled which were built after this date, while the traditional building techniques used to maintain these buildings extend to far later builds for example those built from stone which was the predominant material until the 1950s/60s.
- Through HES's partnership role (Outcome 6: we will have worked with partners and communities to deliver wellbeing and placemaking benefits from heritage), seeking to influence national and local housing, regeneration and economic development policies, HES will be shaping the operating environment for these businesses.

- The following table provides experimental data on pre 1919 elements of the built environment to illustrate the wider sectoral reach of HES's planning, building and partnership activities, spanning government buildings, retail, industrial and commercial operations, demonstrating how exposed these sectors are to heritage-driven changes.

	Site count	Building count	Total area sqm	Est% of space
Agricultural	9,755	47,192	4,786,892	12%
Commercial	5,084	23,631	4,561,685	16%
Education	1,437	20,602	1,392,455	15%
Government	200	1,134	203,138	24%
Health	459	4,941	587,330	20%
Industrial	1,388	10,226	1,672,717	8%
Office	1,332	3,955	623,571	18%
Recreation / Leisure	3,720	15,200	1,893,468	24%
Religious	2,661	14,993	1,052,443	49%
Residential	223,791	914,889	37,462,651	19%
Retail	5,086	9,976	2,510,533	23%
Other	3,114	31,400	1,984,538	11%

- The Corporate Plan does not introduce any immediate risks to these businesses operating from historic buildings but does seek to positively shape their operating environment. The impacts on businesses will be reviewed as part of the statutory planning process for specific individual projects, or through the normal policy review process should new legislation be introduction following the Plan's influence on other partners.

Further baseline data about the impact of the historic environment is available through Scotland's Historic Environment Audit (SHEA), published by HES to track the range and value of sector impacts.

Section 2: Engagement and information gathering

Engagement approach

HES has produced a series of Corporate Plans since it was established in 2014. It is not a discrete one-off process or decision, but the culmination of on-going engagement and evolution within the organisation and across the sector. The long-standing principles set out in the 2014 Act, and long-term mission from the National Historic Environment Strategy give a degree of continuity around the main themes, while the shifting political and financial environment shape the key outcomes and their relative priority.

Evidence gathering and consultation for the Corporate Plan was a combination of long-established relationships with the Scottish Government and key sector stakeholders, managed through HES's External Relationships & Partnership directorate, building on existing datasets and groups established to deliver the sector strategy (OPOF), with a programme of new internal and external themed workshops, a full public consultation/ survey, discrete survey work (such as the required small business impact test sample required for this BRIA) and use of established secondary data sources to demonstrate the scale of business / sector influence the Plan will exert.

The following table summarises HES's approach across each stakeholder group:

Stakeholder group	Existing link or network	Themed group workshop	Public consultation	Discrete survey work	Sector data
Scottish Government	Y	Y			Y
Other public sector	Y	Y	Y	Y	
Business / third sector	Y	Y	Y		Y
General public			Y		
Other (small firm impact test for BRIA)				Y	Y

The consultation programme targeted:

Within Government and the wider sector

- Local authorities, including those in connection with growth deals and local community planning;
- Ministerial portfolios and SG policy teams that the historic environment has relevance and adds most value to e.g., culture, education and skills, climate change and net zero, economy, tourism, natural environment, transport, planning;
- Delivery partners e.g. Skills Development Scotland, Scottish Funding Council, Volunteer Scotland, YoungScot, the enterprise agencies, the national collections, NatureScot, and various higher and further educations institutions.
- Historic environment sector organisations and funders, including HES, NTS, BEFS members, Historic Houses Scotland, professional bodies (CiFA, RICS, RIAS etc), civic trusts, and other community-heritage organisations.

Public Consultation

A programme was designed to engage the public through a survey and a series of open sessions. Key representative bodies were also engaged to ensure the views of special interest and minority groups were captured in accordance with our commitment to and work on tackling inequality and championing equality, diversity, and human rights-based approaches in our work. The public consultation also captured views from private businesses, additional to those included in the Firms Impact Test.

Businesses

Businesses from all sectors were targeted through the public consultation, including response requests to representative bodies for the key industries and sectors identified as being affected by the Corporate Plan and HES's subsequent actions, notably tourism and construction trade bodies.

HES completed the Scottish Firms Impact Test with a sample of 8 face-to-face consultations (within the recommended range for the BRIA) sampled from HES's existing supplier database and known business partners. In addition to the business responses captured through the public consultation survey. The semi-structured interviews covered (annex 1 for full guide):

- the nature of their relationship with the sector
- their views of the proposed strategic priorities and their consequences
- specific opportunities for their business (both monetary and other)
- perceived risks and costs (including their competitiveness)
- perceived impacts on their supply chain and sustainability
- suggestions for improvement

Full details of the public consultation and individual programmes for the other statutory impact assessments will be published separately.

Section 3: Costs, impacts and benefits

Quantified costs to businesses

The Corporate Plan does not directly introduce any new costs to businesses. It does not include any new regulation or process for businesses to follow. However, by seeking to shape the markets and physical places in which they operate, influencing the demand for their services or the options and regulation around the use and maintenance of their buildings, HES's activities may indirectly affect their operating environment and subsequent cost base.

The previous section identified the key sectors, their size and the potential scale of influence the Corporate Plan will affect. The following sections discuss possible new costs that could affect businesses within these sectors.

In order to manage any potential costs or other adverse effects on businesses, the Corporate Plan seeks to work directly with these sectors, stakeholders and communities to ensure that decision making is tailored and fully factors in all requirements, rather than imposing a single model / system to be adhered to. Through on-going review of individual projects and initiatives, any new costs to businesses will be identified and managed across the 3-year Corporate Plan cycle.

Construction sector & maintenance costs

Nature of change: The plan should influence this market by working with the construction industry and contractors to encourage appropriate maintenance, develop and promote best practice guidance and standards, shape skills and training requirements, and endorse the energy efficiency adaptation of existing stock to meet the Scottish Government's climate ambitions. The strategy will also encourage working in partnership with local areas and sectors to identify the best sustainable uses for existing buildings, which may require a change of use as part of a wider development or regeneration programme

Possible costs: This approach could result in direct or indirect costs for construction industry businesses as they seek to meet these standards, potentially requiring additional training, recruitment of new or specialist skills, or sourcing of particular materials. Similarly, it could affect businesses across all sectors based in historic buildings as they work to meet new maintenance/adaptation standards themselves, or if local areas place pressure on existing occupiers to meet the area's wider aspirations.

Business response: HES's approach is aligned with the Scottish Government's and construction industry's own ambitions to improve sustainability and provision in this area. It is unlikely that HES is introducing additional pressures that are not already factored into businesses longer-term planning. In addition, HES's direct training provision and advances in technical research and adaptation techniques could save the industry cost rather than pursuing this through other channels.

Tourism sector

Nature of change: The Corporate Plan is prioritising both growth and sustainability in tourism, balancing the need for tourism employment and commercial income for the sector with the wider social and environmental priorities of local areas. The Plan will shape the sector's approach to opening/closure/promotion of heritage attractions, the facilities they offer and accessibility, and the resultant distribution of visitors and their spend.

Possible costs: international visitors account for 72% of the current net heritage economic impact. They have the highest average spend and are also far more likely to be in an area because of heritage attractions than domestic visitors, meaning that losing them would have a disproportionate effect on local businesses. Core heritage sector organisations (HES, NTS, HHA etc) also rely on international visitors for a significant share of their commercial income (and therefore total budget for reinvestment). International visitors also have the highest average carbon footprint because of their travel. More generally, some communities report that over-tourism is damaging their local infrastructure or is disruptive. Any new measures introduced through the Plan which reduce the volume of visitors for environmental or social reasons will have an immediate impact on tourism businesses. Any investment which prioritises some attractions and locations over others for improvement and promotion will potentially also redistribute visitor spend to other businesses.

HES's ambition to grow income from non-Government sources (Outcome 8), including any change in the availability and admission price of Properties in Care, could also add costs for businesses which rely on block-booking tickets. This concern was particularly raised by travel trade & tour operators and package-deal providers during the Scottish Firm Impact Test interviews, along with concerns over any changes to the IT system through which this process is managed. Most of the packages offered by the interviewed operators included Edinburgh Castle tickets as standard in their offer, being critical to the overall sale, while many operators also run individual tours around other PICs including paid and free-admission sites.

Business respondents were also concerned about the potential for immediate and unannounced PIC closures (such as with the previous high level masonry programme), and lack of advance notice around planned instances e.g. state visits, which result in significant costs for compensation and alternative provision for visitors.

Other business costs raised

Applicants to HES's grants programmes may incur new costs in demonstrating their alignment with the new Corporate Plan priorities (such as admin time or consultancy fees), while existing recipients of multi-year grants may have to adjust their monitoring and reporting requirements accordingly.

Other impacts

Construction businesses noted that the scale of ambition presented in the plan around maintenance, conversion and re-use, and influencing multi-year major public investments, while admirable and fitting with the industry's own intention, was not tempered by the reality of construction industry recruitment issues and rising cost base for both staff and materials, noting that many customers (heritage asset owners) are not willing or able to invest without further financial support. Some smaller businesses raised concerns that they will increasingly be asked to provide technical net zero conversion services without a sufficient supply chain of sufficiently skilled workers available, affecting their longer-term prospects.

Scottish firms' international competitiveness

The PICs and particularly Edinburgh Castle are emblems of Scotland and critical to the visitor offer. Business respondents welcomed HES's re-enforcement of its custodian role, and commitment to conservation of key assets, especially the announced masterplan investment

at Edinburgh Castle over the next 3 years – though many requested further details be included about the specific nature of the change and whether it would affect pricing.

Tourism businesses reported that the price of admission at PICs needs to reflect their condition and the quality of the offer, amidst wider industry concerns that Scotland is becoming increasingly expensive but perceived as less good value in the international holiday market.

Businesses from both the tourism and construction industries welcomed the alignment of HES's Corporate Plan priorities around sustainability, place and fair work with the general direction the industries are pursuing, and how they wish to present themselves in international markets, rather than merely on cost.

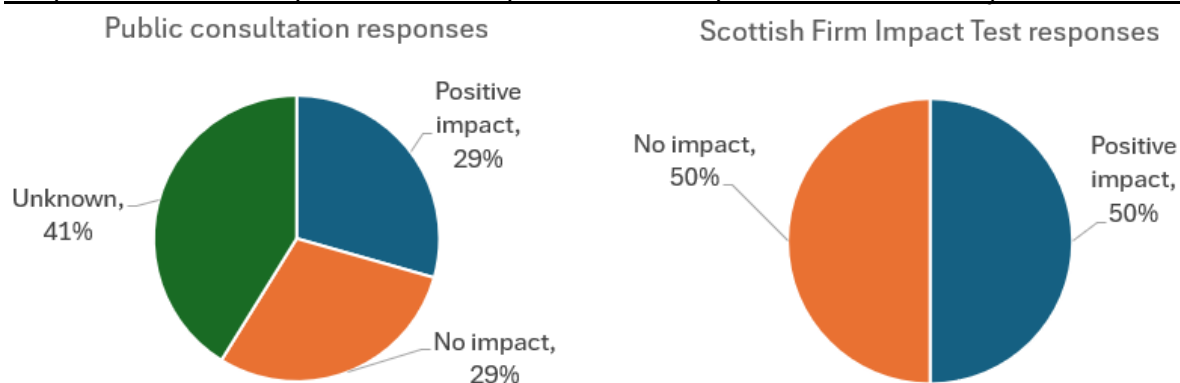
Benefits to business

The overall intention of the Corporate Plan is to find the best outcomes possible for the historic environment and the businesses that operate within it, and to work in partnership with all stakeholders to achieve this sustainably. Outcome 7 states the intention: to increase and broaden (HES's) contribution to a growing Scottish economy, safeguarding and building on the extensive range of economic impacts and benefits identified in the "sectors and groups affected" section of this report.

The consultation process has confirmed that businesses across all relevant sectors see the Corporate Plan as having a positive impact on them, or no impact. The range of objectives mirrored the businesses' own wider ambitions to shape their operations for sustainable growth.

No businesses anticipated an overall negative impact on their business. However, many of the businesses consulted raised concerns that this was only a commentary on the tone and ambition of the plan, rather than a true reflection of potential impacts due to the lack of specific details presented around HES's specific investments and proposals to implement the Plan.

Graph 2: Business responses: what impact will the Corporate Plan have on your business?



Additional benefits were identified as follows:

Possible construction benefits: The scale of investment in built heritage, and commitment across the sector provided by the Corporate Plan, provides significant long-term opportunity for construction businesses to safeguard existing operations and grow into new opportunity areas around adaptation of traditional stock, with support and advice from the sector about how to transition. For example, the Scottish Government estimates £33Bn will be required to adapt Scotland's housing to zero emissions – a fifth of residential stock is traditionally

constructed, implying c. £7 Bn of new investment on top of the existing repair & maintenance requirement.

Tourism benefits: the absolute scale of heritage tourism is a major driver of Scotland's economy. Again, by presenting a clear statement about the sector's joint approach to transition towards sustainable tourism, together with investment in critical assets like Edinburgh Castle, the Corporate Plan gives a platform for businesses in the sector. New approaches will be required to tackle climate, transport and social issues and businesses welcomed any advances HES can provide.

In addition:

- Tourism businesses welcomed the proposed spread of visitors to wider locations and outlier PICs, implying investment and creating new business opportunities outside the main PICs where there is congestion and capacity limits.
- All consulted businesses welcomed HES's intention to increase local sourcing and supply chain provision

Small business impacts

Heritage impacts are concentrated in sectors and local areas which have a high concentration of micro and small businesses, including those with niche traditional skills, in the tourism & hospitality market or operating in remote and rural areas where visitor spend is attracted by heritage attractions. Specific industry statistics are not available for heritage at present, but as an illustration:

- 90% of businesses registered in Scotland's construction industry are sole operators (tradespeople) or working in micro-businesses with fewer than 5 employees.
- Half of employment in Scotland's sustainable tourism industry is in small businesses (defined by Scottish Government as <49 employees).
- 80% of all business in accessible and remote rural areas have fewer than 5 employees, and 70% of businesses in remote small towns are in that size bands. The PICs and other heritage attractions are heavily concentrated in these remote areas.

Scotland's small businesses are therefore significantly exposed to the impacts of HES's Corporate Plan. Responses from the small businesses consulted during the Scottish Firms Impact test mirrored the overall results profile, either seeing the plan as positive or having no impact on their operations. They welcomed HES's intentions to spread current visitors to new areas creating new markets and opportunities, and to adopt a sustainable growth approach and work with local stakeholders when making investment choices.

No additional costs or risks have been identified by small businesses during the consultation programme, though (as with the general business responses) they noted the lack of specific detail around investments and their relative sensitivity to regional spend.

Investment

Foreign Direct Investment: The historic environment is a recognised driver for Foreign Direct Investment, adding to Scotland's international reputation and the overall attractiveness of Scotland as a business location, but further work is required to establish the extent of this impact. This will affect investment in both heritage and non-heritage assets.

Business level investment: business consultees welcomed the intention of the Corporate Plan, but noted the lack of specific details means they would not alter their investment profile because of it. However, most noted that they are aware of HES's more detailed operating plans and themed strategies, or had a direct route to contact HES to discuss individual sites or proposals.

Workforce and Fair Work

The Corporate Plan consultation draft specifically noted HES's commitment to support fair growth principles across the sector, together with formal objectives around inclusion and resilience. The businesses consulted welcomed this commitment, though some noted that they aspire to (but do not yet achieve) the full Fair Work standard, particularly micro tourism businesses operating seasonally.

Climate change/ Circular Economy

Sustainability is targeted across all areas of the Corporate Plan, including the specific Climate Action theme with the objectives that by 2028 we will:

- Have reduced carbon emissions from historic environment assets across Scotland;
- Have supported Scotland's historic environment to adapt to meet the changing climate.

The potential costs and benefits of this approach, particularly within the tourism and construction sectors have been reviewed in the costs/benefits section of this report, noting that HES's objectives are aligned with the wider national and sectoral ambitions around climate change.

Competition Assessment

The five standard Competition and Markets Authority (CMA) assessment questions were included in the Firm Impact Test topic guide (annex 1). The feedback received from businesses, together with the general assessment, has not identified any significant or high-risk issues to address. HES will seek advice from the CMA if issues arise during implementation of the Corporate Plan.

CMA question	Risk level	Details and mitigation
1. Will the new Corporate Plan directly or indirectly limit the number or range of suppliers?	Low	Any new common guidance, standards or training requirements introduced through the Corporate Plan could influence procurement across the sector (where not bound to Scottish Government procurement policy) and exclude some existing suppliers who can't meet them. Consultees did not identify any immediate concerns, given the themes in the Corporate Plan are aligned with the sector's own ambitions in OPOF. The focus on growth and sustainability are expected to increase opportunities for new suppliers.

2. Will the Plan limit the ability of suppliers to compete?	Low	As above: Any new common guidance, standards or training requirements introduced through the Corporate Plan could influence procurement across the sector (where not bound to Scottish Government procurement policy) and exclude some existing suppliers who can't meet them. Consultees did not identify any immediate concerns, given the themes in the Corporate Plan are aligned with the sector's own ambitions in OPOF. The focus on growth and sustainability are expected to increase opportunities for new suppliers.
3. Will the Plan limit suppliers' incentives to compete?	Low	The Plan aims to address current under-capacity in certain skillsets and encourage engagement across all suppliers to meet new opportunities around building adaptation/conversion and sustainable tourism amongst others. The Plan is also unlikely to introduce new standards and measures which do not have precedent in higher level Government strategies and will therefore be consistent across all sectors e.g. around sustainability. Again, respondents raised no concerns on this front, with many seeing opportunity rather than risk.
4. Will the Plan limit the choices and information available to consumers?	Low	<p>For the purposes of the Plan, consumers are defined as anyone who uses the historic environment or buys related goods or digital content now or in the future. The rationale for the Corporate Plan is to provide increased transparency and clarity for consumers, providers and other users of Scotland's heritage through publication of a common vision and set of objectives.</p> <p>There is a degree of competition within the sector itself, with providers of heritage attractions and non-heritage attractions competing for visitors' spend and for competitive funding pots / grants. The Corporate Plan is there to implement the common set of objectives in OPOF and agreement on a partnership approach should minimise any risks around this competition.</p>
5. Will the Corporate Plan affect suppliers' ability and/or incentive to introduce new technologies,	Zero	The Corporate Plan is actively seeking opportunities for new innovation to support the conservation and re-use of heritage in a sustainable way, and to ensure that Scotland's heritage is accessible to all.

products or business models?		This does not guarantee that every new innovation can be adopted by the sector, but no consultees raised concerns around their own incentive.
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Consumer Duty

For the purposes of this assessment, consumers are defined as anyone who uses the historic environment or buys related goods or digital content now or in the future, including paid admission to sites.

While much of the historic environment is freely available to users, either in public spaces, through uncharged attractions or via open websites operated by Trusts and Charities, commercial income is central to survival of HES and the sector so there are also charged attractions and services. There are a range of public, private and third sector providers, each of which will have different sourcing and pricing strategies.

The Corporate Plan will not determine common charging policies, but is responsible for implementing the sector's wider objectives around equal access. Based on Consumer Scotland's screening questions outlined below, it is unlikely that the Corporate Plan will introduce any new consumer pricing or quality issues which are not the result of wider economic circumstances. However, it is likely that heritage consumers will experience increasing costs for some heritage uses, given HES and the sector rely on commercial income and have to meet increasing operating costs.

HES operates a hybrid business model, receiving grant-in-aid from the Scottish Government and generating commercial, charitable and fundraising income through the Properties in Care, Collections, Archives and other activities to fund operations. The Scottish Government agrees HES's total budget allocation based on commercial income forecasts. The Corporate Plan recognises this through Outcome 12: We will have generated the financial resources to deliver our priorities, while individual Annual Operating Plans set out the details of the budget agreement.

What are the impacts on Consumers? Is it likely that harm will be experienced by consumers as a result of this proposal?

- The Corporate Plan is aiming to improve the quality and accessibility of the historic environment and does not introduce any direct pricing policy or changes. However, any new guidance, advice and standards introduced during the Plan's implementation could indirectly result in higher operating costs for provision of heritage goods and services, which may have to be passed to consumers given HES and the sector's relative reliance on commercial income.
- While some goods and services may necessarily have to increase prices to deliver economic, social and environmental objectives, and some attractions may increase in price, the majority of the historic environment will still not be subjected to direct charges.

Does the policy affect the essential services market, such as energy or water?

- Very unlikely, although it is possible that environmental adaptation of some historic buildings/sites could result in surplus energy generation e.g. installation of heat pumps. It is unlikely that this would be delivered on a scale to influence market prices though.

Does the policy involve storage or increased use of consumer data?

- Monitoring and performance reporting for the Corporate Plan will require collection of some consumer data, as will delivery of some services e.g. for online ticket or goods sales and in the design of services. HES complies with the Scottish Government's Management Information Strategy in the collection and storage of all data and it is unlikely this will exceed current levels.

Does the policy increase opportunities for unscrupulous suppliers to target consumers?

- Unlikely, although it is anecdotally known that some construction activity is delivered by unregistered suppliers, or is unrecorded, and the quality of work on traditional buildings is virtually impossible to monitor. Introduction of new standards around climate adaptation, and the corresponding grants and funding available, could offer some increased incentive to unscrupulous suppliers to increase prices or sell services without the full training or recommended materials. The strategy will seek to work with the wider industry to minimise any risks.

Does the policy impact the information available to consumers on either goods or services, or their rights in relation to these?

- The Corporate Plan aims to make heritage accessible to all and is seeking to improve access to and information about the historic environment, the services available and the corresponding costs where relevant.

Section 4: UK, EU and International Regulatory Alignment and Obligations

Internal Market/ Intra-UK Trade/ International Trade Implications

The Corporate Plan is not introducing any new policy which will affect intra-UK trade or lead to a divergence of approach. It is however looking to shape demand in the visitor and construction markets, which may lead to some redistribution between domestic provision and imports from rest-UK depending on companies' ability to meet visitor requirements and construction standards.

HES implements the Historic Environment Policy for Scotland (HEPS), which is devolved to Scotland and discrete from UK heritage policy. The Corporate Plan is not introducing any formal changes to HEPS. Any changes to HEPS resulting from the implementation of the Corporate Plan priorities would have to follow a separate formal legislative process.

EU Alignment consideration

Any new advice and research HES produces regarding historic building standards, sustainable conversion and re-use will follow the Scottish Government's legislative framework and ambition for shared standards with the EU. HES routinely works with both EU and International specialists to develop improving standards in conservation and heritage management. HES works together with VisitScotland to ensure cohesive external presentation of Scotland's international offer around tourism and FDI.

Legal Aid

The Corporate Plan will not be introducing any new legislation or amending existing legislation directly, focusing instead on partnership, good practice, sector improvement and support. The types of legal matter in relation to which individuals may be involved, and to which the Plan relates, include community asset transfers, guardianship agreements relating to properties in care, planning matters, actions relating to liability for advice being provided by organisations within the sector to individuals, and/or applications for judicial review relating to decisions taken by public sector organisations in line with the strategy.

HES's understanding is that legal aid is unlikely to be available to individuals impacted by such matters (and of course legal aid is not available to organisations). As such, HES considers that it is unlikely that the strategy will have an impact on legal aid requirements. HES will engage with the Scottish Government's Justice Team and Legal Aid Board if any concerns are raised during implementation of the Corporate Plan.

Digital impact

The Corporate Plan is targeting an increased focus on digital provision in the sector, intent on improving both accessibility to heritage materials and services and promoting the overall sustainability of sector provision. It is likely to affect user engagement for online services, and in the design of on-site interpretation at attractions.

Many offline heritage services will continue as they are not suited to online provision e.g. archaeological digs or site visits. The Plan does not define each service, but sets common improvement objectives where digital provision can complement or safely replace offline provision. In some cases e.g. the loss of existing physical heritage assets due to natural

circumstances or planning decisions, online recording and presentation may replace the existing traditional asset. The strategy will set out the sector's approach to ensure this happens in a managed way.

HES has developed a Digital Strategy to ensure appropriate alignment with changing digital technologies and the risks and opportunities they present. The Equalities Impact Assessment for the strategy will also ensure that digital provision is appropriate for vulnerable groups. The Corporate Plan will does not introduce any new technology which could disadvantage customers, suppliers or stakeholders – any technical investment resulting from the Plan will follow normal approval process, including Scottish Government approval for large scale IT investments over £5m or which are considered contentious.

Business forms

No new business forms will be introduced through the Corporate Plan. Any subsequent changes during the implementation of the plan will undertake individual assessments prior to introduction.

Section 5: Next steps and implementation

Recommendations/ preferred option

The recommended option is the production of a new Corporate Plan for the historic environment sector, following the commission from the Minister. Indeed, there is no alternative option.

The BRIA has not identified any significant business or regulatory concerns relating to the 5 strategic themes included in the draft Corporate Plan circulated for public and business consultations:

- Scotland's Heritage
- Skills & learning
- People & Places
- Climate Action
- Inclusion & Resilience

The Corporate Plan is a high-level document, setting objectives and principles, but does not include specific details about the themes will be implemented, or of the specific projects, investments and policy changes that could ensue.

Businesses consulted have noted that the draft Corporate Plan is “aspiration not information” and as such it is difficult for them to fully identify possible concerns. However, they rated the plan as either positive or neutral for their prospects overall, and welcome the partnership approach, communication channels and more detailed Annual Operating Plan and themed plans that HES produces. The Corporate Plan is seen to be well aligned with key stakeholder sectors' own aspirations to develop and use heritage more sustainably and acknowledge the wider risks and opportunities this transition could introduce.

The key considerations for HES when introducing and implementing the Plan are to:

- Maintain good communication channels around the development and implementation of specific policies, projects and investments that will affect the pool of sector stakeholders identified in this BRIA;
- Acknowledge the possible conflict between the heritage sector's reliance on visitor-driven commercial income and the need for a sustainable tourism approach which requires reduced visitor carbon footprints and accommodates local social requirements which may reduce the commerciality of sites and attractions;
- Work with the construction industry to ensure that any new guidance and training requirements will not exclude existing providers without corresponding support where viable.
- Acknowledge the risk of competition between providers within the heritage sector for common funding and for visitor expenditure.
- Recognise the importance of Edinburgh Castle to the national tourism industry, and that the quality of visitor experience needs to match the ticket price to protect Scotland's overall perceived value-for-money offer which is increasingly challenging.

However, this does not preclude price increases as long as they are matched by corresponding investment or innovation.

- Use the cycle of Annual Operating Plans (AOPs) to revisit fundamental Corporate Plan themes and highlight where performance varies for the intended outcome, or the emphasis of the outcomes or key measure changes.

HES has made amendments to the objectives in the Corporate Plan since the draft was released for consultation and introduced a monitoring framework and key performance indicators to track progress, while retaining the 5 strategic themes. This approach has evolved the Plan to provide clearer focus in response to the consultation findings, without materially affecting the range of impact identified in this BRIA.

Implementation considerations and review

A full monitoring framework has been developed with key performance indicators (KPIs) for each outcome and will be included in the published Plan. The indicators draw from a range of partners and public data sources to ensure sufficiently comprehensive coverage.

The Corporate Plan is a high-level 3-year document. It is supplemented with Annual Operating Plans, which include the detailed actions HES is taking each year towards the objectives in the Corporate Plan.

Performance tracking against the KPIs is reviewed quarterly by HES's Executive Leadership Team and Board and shared with the Scottish Government. Annual progress is published in HES's Annual Report & Account.

Declaration

I have read the Business and Regulatory Impact Assessment and I am satisfied that it represents a fair and reasonable view of the expected costs, benefits and impact of the policy, and that these have been taken into account when making the policy decision. I am satisfied that business impact has been assessed with the support of businesses in Scotland.

I am also satisfied that officials have considered the impact on consumers as required by the [Consumer Scotland Act 2020](#) in completion of the Consumer Duty section of this BRIA.

Signed: Katerina Brown

Date: 26/03/25

CEO's name: Katerina Brown

CEO's title: Chief Executive

Organisation: Historic Environment Scotland

Scottish Government Contact point: Historic Environment Scotland, 0131 668 860

Annex 1 – Scottish Firms Impact Test Topic Guide (semi-structured)

1. Company / organisation name
2. Respondent Name / role
3. Size – employees / turnover / # businesses represented
4. Quick overview of activities / skills of business / link to sector
5. Nature of relationship with heritage sector: supplier / contractor / umbrella organisation
6. Duration – on-going, one-off, specific site, multi-site specific discipline
7. Expectation of future engagement / sales
8. Value – per annum
9. Share of total turnover / exposure – is heritage sector the main purchaser?
10. Awareness of HES Corporate Plan? Something you'd look at if not prompted?
11. HES to provide an overview of the plan and key areas.
12. Views of strategic priorities and objectives:
 - Overall impression rating (sliding scale e.g. 1 = bad for business, 3 = neutral, 5 = good for business)
 - Of the plan itself
 - From individual business perspective
 - On business competitiveness domestically and internationally
 - Overlap / relevance of key priorities in the plan – fit with business areas and priorities
 - In terms of skills / services / products offered by business
 - In terms of target areas of their business – is the heritage sector actively targeted / assumed to be in income forecast
13. Positives – and opportunities for business / other benefits (monetary / other)
14. Negatives – and perceived risks for business or other costs (increased costs of engagement, monetary and other)
15. Particular areas of concern or where would like to see further clarification / details?
16. Do you think it will have any effect on your suppliers – spend or choice of which ones?
17. Anything in the plan which will affect competitiveness of business – e.g. heritage sector organisations entering areas you compete in, or opening market to other competing suppliers
18. Suggestions for improvement