ULSTER ARCHITECTURAL HERITAGE

Response to the Consultation on a Historic Environment Policy for Northern Ireland

Department for Communities | October 2026

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Executive summary

Ulster Architectural Heritage (UAH) welcomes the Department for Communities' consultation on the development of a Historic Environment Policy for Northern Ireland.

The Society supports the establishment of a long-term, strategic policy recognising the importance of the historic environment to Northern Ireland's cultural identity, economy, communities and environment.

UAH particularly welcomes the accompanying Strategic Environmental Assessment (SEA), which provides a substantial and, in places, concerning assessment of the present condition of Northern Ireland's historic environment and the effectiveness of existing arrangements for its protection.

The evidence demonstrates that the deterioration of historic buildings and monuments is not simply a consequence of isolated failures by individual owners. It reflects wider systemic problems involving inadequate investment, inconsistent enforcement, shortages of specialist expertise and insufficient coordination between public authorities.

UAH considers that these findings require a more ambitious response than the proposed aims presently articulate.

The fundamental purpose of a Historic Environment Policy must be to safeguard Northern Ireland's historic environment for future generations. Its primary measure of success should therefore be whether it halts and reverses the deterioration and loss of historic assets.

While the Society broadly supports the proposed 17 aims, it recommends that the emerging policy be strengthened through four principal commitments:

1. **An explicit overarching objective to halt and reverse the deterioration and loss of Northern Ireland's historic environment**, supported by measurable targets for improving condition and reducing Heritage at Risk.

2. **A consistent Northern Ireland-wide conservation and planning framework**, ensuring that the fundamental standards applying to nationally designated heritage assets do not vary materially between the eleven council areas.

3. **A strengthened system of heritage enforcement and intervention**, with clearly defined responsibilities, appropriate statutory powers, effective central oversight and transparent performance monitoring.

4. **A properly resourced implementation programme,** providing sustained investment in preventative maintenance, repair, conservation skills and the rescue and sustainable reuse of historic buildings, alongside action on financial and legislative disincentives.

UAH believes these commitments are essential if the proposed policy is to deliver meaningful improvements rather than simply provide a statement of desirable ambitions.

1. General observations on the proposed vision and aims

UAH welcomes the recognition that Northern Ireland's historic environment is a finite and irreplaceable resource which contributes significantly to the character, identity and prosperity of the region.

The Society also supports the proposed policy's broad recognition of the relationship between heritage and regeneration, climate change, skills, education, wellbeing, tourism and community development.

However, UAH is concerned that the breadth of the proposed 17 aims risks obscuring the fundamental responsibilities of historic-environment policy.

The preservation and sustainable management of historic assets must remain its central purpose.

UAH acknowledges that, in the present political and economic environment, measuring and articulating the wider social, environmental and economic benefits of heritage is vital to securing public and political support for its conservation. **These benefits nevertheless depend upon the continued survival and appropriate conservation of the historic assets themselves.**

The Society therefore considers that the final policy should establish a clear distinction between:

- **Primary conservation objectives:** identifying, protecting, maintaining, repairing and securing the future of historic assets.
- **Supporting objectives:** developing skills, improving knowledge, securing investment and enabling sustainable reuse.
- **Wider benefits:** regeneration, education, wellbeing, tourism, community cohesion and economic development.

UAH recognises that conservation and wider public benefits are mutually reinforcing. Within that relationship, however, safeguarding the historic environment must remain the policy's primary objective. The interdependence of the proposed aims must not obscure the need for clear conservation priorities or the need to assess success principally through the condition, protection and survival of historic assets.

UAH recommends that the policy's overarching vision expressly commit the Northern Ireland Executive to halting and reversing the deterioration of the historic environment.

This should provide the central measure against which progress on all 17 aims is assessed.

2. A consistent Northern Ireland-wide planning and conservation framework

Relevant principally to Aim 1: Developing best practice to identify and safeguard our historic environment.

UAH considers that the relationship between regional historic-environment policy and the Local Development Plans being adopted by Northern Ireland's eleven councils requires particular attention.

Listed buildings and scheduled monuments are designated because of their architectural, historic or archaeological significance. That significance does not depend upon the local government district within which the asset happens to be situated.

The Society is concerned that the development of separate Local Development Plans risks creating materially different conservation policies and development management tests for nationally designated heritage assets.

Although the statutory framework and existing regional planning policy provide a degree of consistency, there remains a risk that differing local policy approaches will result in inconsistent decisions concerning alterations, setting, heritage significance, harm and demolition.

UAH recognises that councils must be able to respond to the distinctive characteristics of their areas.

Local planning policies are particularly important in addressing Conservation Areas, historic townscapes, local heritage assets and distinctive landscapes.

However, the fundamental principles governing the protection of nationally designated assets should be established consistently at Northern Ireland level.

The Society therefore recommends that the Department for Communities work with the Department for Infrastructure to develop an updated, regionally applicable historic-environment planning framework.

This should establish common conservation principles and decision-making tests covering:

- Assessment of heritage significance.
- Protection of historic fabric and architectural character.
- Alterations and extensions to listed buildings.
- Development affecting the setting of designated heritage assets.
- Assessment and justification of harm.
- Conservation-led adaptation and reuse.
- Assessment of structural condition and conservation deficit.
- The evidential requirements for demolition or substantial loss.
- The treatment of prolonged neglect.
- The exceptional circumstances in which substantial harm might be justified.

These principles should be reflected consistently within Local Development Plans, with councils able to supplement them through locally specific policies but not materially weaken the level of protection afforded to nationally designated assets.

The SEA's acknowledgement of variations in council expertise and enforcement reinforces the importance of maintaining a consistent regional approach.

UAH recommends that the emerging Historic Environment Policy contain an explicit commitment to work with DfI to strengthen and update regional planning policy for the historic environment, rather

than relying solely upon high-level guidance or the progressive adoption of individual council policies.

3. A specific commitment to halting and reversing heritage deterioration

Relevant to Aims 1, 3, 4 and 13, and to the overarching policy vision.

The SEA presents substantial evidence of the deterioration of Northern Ireland's historic environment.

It records a significant decline in listed-building condition over approximately twenty years, a substantial increase in the number of assets identified as being at risk and continuing problems associated with vacancy, disrepair and inadequate maintenance.

UAH considers these findings to be among the most important aspects of the consultation documents.

They demonstrate that existing systems of protection and investment have not been sufficient to prevent a progressive decline in the condition of the historic environment.

However, none of the proposed aims makes halting and reversing this deterioration its central, explicit objective.

The Society considers this a significant omission.

The policy should not merely seek to improve understanding, develop best practice or encourage wider use of historic assets. It should commit government to securing measurable improvements in their physical condition and long-term survival.

UAH recommends that the emerging policy establish a clear overarching objective:

To halt and reverse the deterioration and avoidable loss of Northern Ireland's historic environment through effective protection, preventative maintenance, repair, conservation-led reuse and timely intervention.

This should be supported by measurable indicators, including:

- The proportion of listed buildings in good or satisfactory condition.
- The number and proportion of designated assets at risk.
- The number of assets successfully removed from the Heritage at Risk register through conservation.
- The number of avoidable losses of designated historic buildings.
- Levels of investment in maintenance and repair.

The condition and management of Conservation Areas.

- The performance of statutory enforcement and intervention arrangements.

UAH recommends the establishment of a baseline at the beginning of the policy period, together with interim and longer-term targets.

Without measurable conservation outcomes, it will be difficult to establish whether the policy has achieved its fundamental purpose.

4. Strengthening heritage enforcement and intervention

Relevant principally to Aim 1, with important connections to Aims 3, 4 and 13.

UAH particularly welcomes the candid assessment of heritage enforcement contained within the SEA.

The document identifies serious weaknesses in the existing arrangements, including cases referred to councils which have not progressed, the limited use of statutory intervention powers and the absence of routine monitoring of heritage enforcement activity.

The SEA also acknowledges that variations in council capacity and expertise present significant obstacles to consistent protection.

UAH considers these findings to be sufficiently serious to justify a specific policy commitment to improving heritage enforcement.

The Society is concerned that statutory designation can become ineffective where unauthorised works, prolonged neglect or inappropriate development are allowed to continue without timely intervention.

The existence of statutory powers is not, in itself, sufficient to safeguard historic assets.

Those powers must be understood, appropriately resourced and exercised when circumstances require.

UAH therefore recommends the development of a **Northern Ireland-wide Historic Environment Enforcement and Intervention Framework**.

This should include:

- Clear responsibilities for councils and HED.
- Consistent procedures for investigating suspected breaches.

- Guidance on the use of statutory enforcement and urgent intervention powers.
- Defined arrangements for escalation where serious harm is continuing.
- Access to appropriately qualified conservation expertise.
- Regular training for planning and enforcement officers.
- Annual recording and publication of enforcement activity.

  Monitoring of outcomes rather than simply the number of investigations undertaken.

The Society further recommends that the Department review whether the existing statutory framework provides sufficiently effective mechanisms for responding to prolonged neglect, unauthorised works and threatened demolition.

Particular attention should be given to circumstances where a building's deteriorating condition is subsequently relied upon to justify its demolition.

UAH considers that effective enforcement must be recognised as an essential component of conservation policy, rather than a discretionary activity dependent upon individual council priorities.

5. Central government leadership and local authority capacity

Relevant to Aims 1, 2, 11 and 13.

UAH welcomes the SEA's recognition that transferring full responsibility for heritage protection to local councils would not presently provide the necessary level of protection.

The Society considers that the Department for Communities and its Historic Environment Division must retain a strong central leadership role.

This is particularly important in relation to statutory designation, conservation standards, specialist expertise, the development of regional guidance and oversight of the effectiveness of the protection system.

However, UAH also recognises the essential role played by district councils in planning, enforcement, regeneration and the management of local historic environments.

The policy should therefore establish a clearer division of responsibilities between DfC, HED, DfI and district councils.

It should identify who is responsible for ensuring that the system operates consistently and what mechanisms exist to address identified shortcomings.

Central government should also coordinate a review of legislative, regulatory and financial barriers that inhibit the

protection, maintenance and reuse of historic assets, together with a published programme for addressing those barriers.

UAH further recommends that every council should have access to appropriately qualified specialist conservation advice when exercising its planning and enforcement responsibilities.

This may be achieved through dedicated conservation officers or properly structured shared services, but the availability of suitable expertise should not depend upon the priorities or financial circumstances of an individual council.

The Society also recommends a coordinated programme of training and technical guidance for planning officers, enforcement officers and elected members involved in planning decisions.

Partnership working is welcome, but it must not result in uncertainty about responsibility or accountability.

6. Long-term funding, conservation deficit and preventative maintenance

Relevant principally to Aims 3, 4 and 14.

UAH welcomes the recognition within the consultation documents of the conservation deficit and market failure affecting Northern Ireland's historic environment.

The Society considers that the scale of the problem requires a more substantial and sustained financial response than has been available in recent years.

Historic buildings frequently require specialist materials, skilled labour and professional expertise.

Their repair and adaptation can involve additional costs which are not always reflected in their market value or potential economic return.

Where these costs cannot reasonably be recovered, important buildings may remain vacant, deteriorate or become increasingly difficult to rescue.

UAH therefore recommends that the emerging policy include a commitment to developing a **multi-year historic-environment investment programme**.

This should support:

- Essential repair of listed buildings and scheduled monuments.
- Routine and preventative maintenance.
- Early intervention in deteriorating buildings.
- Heritage at Risk rescue projects.
- Conservation-led regeneration.

- Feasibility studies, condition surveys and conservation plans.
- Building Preservation Trusts and community-led reuse.
- Traditional building skills and specialist conservation work.

The Society particularly wishes to emphasise preventative maintenance.

The financial and environmental costs of allowing a historic building to deteriorate until substantial reconstruction or emergency intervention becomes necessary are frequently far greater than those associated with timely maintenance and repair. UAH therefore recommends that a **maintenance-first approach** be adopted as a central principle of the policy.

Funding arrangements should also recognise that successful conservation projects frequently require significant preparatory work before capital investment becomes possible.

Without support for professional advice, feasibility, project development and organisational capacity, many otherwise viable rescue schemes cannot progress.

UAH further recommends a coordinated review of legislative, taxation, rating and funding arrangements that can discourage the repair and sustainable reuse of historic buildings. The review should consider, in particular, VAT treatment of conservation and repair works, business rates and reliefs affecting vacant historic property, and fiscal incentives for preventative maintenance. It should lead to a published programme of proposed reforms, identifying responsible departments, timescales and measures within devolved competence, as well as matters requiring engagement with the UK Government.

The Society considers that financial assistance should be complemented by effective enforcement, distinguishing between owners who genuinely lack the means to maintain their buildings and circumstances where neglect is allowed to continue despite reasonable opportunities for intervention.

7. A more effective strategy for Heritage at Risk

Relevant to Aims 1, 3 and 4.

UAH welcomes the recognition within the consultation documents of the growing scale of Heritage at Risk and the contribution made by the Heritage at Risk programme.

However, identifying buildings as being at risk must be accompanied by mechanisms capable of securing their future.

The Society recommends the development of a formal Heritage at Risk intervention strategy establishing a coordinated process of:

1. Identification and condition assessment.
2. Engagement with owners and relevant authorities.
3. Provision of general advice to owners, with a separate pathway to specialist conservation advice where the condition or significance of a building warrants it.
4. Consideration of financial assistance and viable reuse options.
5. Exploration of community or charitable intervention where appropriate.
6. Use of statutory powers where necessary to prevent continuing deterioration or loss.

Within HARNI, a distinction should be made between accessible initial advice for owners and targeted specialist input, including conservation architecture or engineering advice where this is likely to secure a more effective intervention. Such provision must be supported by appropriate resources.

Such a framework should recognise the distinction between owners who lack the financial capacity to undertake necessary repairs and circumstances in which neglect is being allowed to continue despite reasonable opportunities for intervention.

The Society considers that the combination of support, incentives and effective enforcement identified within the SEA provides an appropriate basis for this approach.

UAH also recommends measurable targets for achieving verified conservation outcomes, including the successful repair and sustainable reuse of assets identified as being at risk. Decisions to add or remove individual assets from the Heritage at Risk register must remain evidence-based, professionally independent and free from pressure to meet numerical performance targets.

8. Retention, repair and reuse as fundamental conservation principles

Relevant principally to Aims 1, 4 and 6.

UAH strongly supports the recognition within the SEA that historic assets are finite, irreplaceable resources and that alternatives which avoid or minimise harm should be preferred.

The Society considers that these principles should be expressed more explicitly within the emerging Historic Environment Policy.

In particular, UAH recommends the adoption of a clear conservation hierarchy:

Maintenance ! **Repair** ! **Retention** ! **Sensitive adaptation and reuse** !
Demolition only as an exceptional last resort.

The Society recognises that not every historic building can remain in its original use and that adaptation may be essential to securing its long-term future.

However, proposals involving substantial loss or demolition should be supported by robust evidence demonstrating that all reasonable alternatives have been properly considered.

Where structural condition is relied upon as justification for demolition, the evidence should be proportionate, technically sound and subject to appropriate independent scrutiny in contentious or exceptional cases.

The policy should also make clear that deterioration arising from prolonged neglect should not automatically provide justification for the loss of a protected building.

UAH considers that stronger regional guidance on the assessment of significance, structural condition, conservation deficit and alternative uses would materially improve consistency and decision-making.

9. Conservation Areas and the wider historic townscape

Relevant principally to Aims 1, 4 and 5.

UAH is concerned that the protection and management of Conservation Areas should receive greater emphasis within the emerging policy.

The significance of the historic environment is not confined to individually listed buildings and scheduled monuments.

Historic streets, groups of buildings, traditional plot patterns, scale, density, materials and relationships between buildings contribute collectively to the character and significance of towns and villages.

These qualities can be progressively eroded through cumulative development even where individual interventions appear relatively modest.

The Society recommends a more systematic approach to Conservation Area management, including:

- Regular review and updating of Conservation Area character appraisals.
- Preparation and implementation of management plans.
- Assessment of cumulative development impacts.

- Appropriate use of Article 4 Directions, which remove specified permitted development rights so that certain alterations require planning permission.
- Monitoring of demolition and loss of historic fabric.
- Conservation-led regeneration and public-realm improvement.

UAH also supports the development of local heritage lists to identify and recognise buildings and structures of local significance which may not meet the criteria for statutory listing.

However, local listing should supplement rather than substitute for the national designation system.

The policy should place greater emphasis on the management of Conservation Areas as coherent historic places, including the cumulative effects of change, not simply the protection of individual designated buildings.

10. Climate change and the environmental benefits of conservation

Relevant principally to Aims 5 and 6.

UAH welcomes the policy's recognition of the relationship between conservation, sustainable development and climate change. However, the proposed approach should be more explicit about both the threats that climate change presents to historic assets and the contribution that conserving existing buildings can make to reducing emissions.

Reducing emissions through conservation. T he maintenance, repair, retention and reuse of existing buildings can reduce construction waste, conserve embodied carbon and avoid unnecessary emissions associated with demolition and replacement.

UAH recommends research and practical assessment methods for embodied carbon and whole-life environmental impacts, so that decisions involving demolition and replacement properly account for the potential emissions savings from maintenance, repair and reuse.

However, energy-efficiency interventions to historic buildings must be informed by an understanding of traditional construction, building physics and the significance of historic fabric.

Inappropriate retrofit measures can cause irreversible damage and should not be promoted without appropriate technical guidance.

Protecting heritage from climate impacts. Flooding, storms, coastal erosion, changing patterns of rainfall, moisture-related deterioration and other climate pressures pose distinct risks to historic buildings, monuments and archaeological sites. UAH recommends dedicated

research, risk assessment, condition monitoring and practical adaptation guidance informed by the needs and significance of historic fabric.

The final policy should establish separate, measurable commitments for climate adaptation and for the reduction of emissions through conservation, supported by research, maintenance, repair, compatible retrofit and reuse. These responsibilities are mutually reinforcing, but each requires distinct actions, resources and performance measures.

11. Skills, research and professional capacity

Relevant principally to Aims 2, 8 and 15.

UAH strongly supports the proposed aims relating to skills, research, archives and innovation.

The shortage of traditional building skills and appropriately qualified conservation professionals is a substantial obstacle to the effective care of historic buildings.

The Society recommends a coordinated programme involving government, educational institutions, professional bodies, contractors and heritage organisations.

This should support traditional crafts, conservation surveying, architectural conservation, archaeology, specialist engineering, project management and heritage-related research.

UAH also welcomes proposals to improve access to historic-environment information, records and archives.

Accurate, accessible information is essential to informed planning decisions and effective conservation.

UAH is concerned that existing public access to information on listed buildings, scheduled monuments and Heritage at Risk is inadequate, and that important information systems require urgent updating. The policy should commit to a timebound modernisation programme for these records, including accurate and regularly updated entries, searchable public access, accessible mapping, clear information on designation and condition, and better links to planning and conservation decision-making.

However, technological innovation should be regarded as a means of improving conservation outcomes rather than an end in itself.

Improving the accuracy, currency and public accessibility of historicenvironment information should be a defined and measurable delivery commitment, rather than a general aspiration to improve digital services.

12. Government leadership and the care of publicly owned heritage

Relevant principally to Aims 11 and 13.

UAH considers that public authorities must demonstrate leadership in the management of their own historic assets.

The consultation documents acknowledge that publicly owned heritage is not immune from vacancy, deterioration and inclusion on the Heritage at Risk register.

The existing Protocol for the Care of the Government Historic Estate already provides a basis for the stewardship of historic buildings in central government ownership. UAH recommends that the emerging policy explicitly build upon that Protocol, assess compliance with its requirements and strengthen reporting on its practical effectiveness. Clear and comparable expectations should also apply to historic assets in local authority ownership.

Such expectations should include regular condition assessments, preventative maintenance plans, timely repairs and transparent reporting on condition and action taken.

Public bodies should be expected to demonstrate the standards of stewardship that they require of private owners.

UAH further recommends that historic-environment objectives be integrated into relevant government programmes relating to regeneration, housing, infrastructure, climate adaptation and public investment.

13. Wider social, cultural and economic aims

Relevant principally to Aims 7, 9, 10, 12, 14, 16 and 17.

UAH supports the policy's objectives concerning wellbeing, education, community cohesion, inclusive access, tourism, international cooperation and the wider economic contribution of the historic environment.

These objectives demonstrate that heritage conservation is not simply concerned with preserving physical structures but also with sustaining places, communities, skills and cultural identity.

Nevertheless, the Society considers that these wider ambitions should remain firmly connected to the physical conservation of historic assets.

The ability of heritage to contribute to tourism, regeneration, wellbeing and community life ultimately depends upon its continued survival and appropriate management.

The Society therefore cautions against allowing the breadth of the policy's social and economic

aspirations to obscure the essential functions of protection, maintenance, repair and conservation.

14. Heritage, Culture and Creativity: distinctive needs and shared action

Relevant to the consultation survey's cross-cutting Heritage, Culture and Creativity programme.

UAH supports closer cooperation across heritage, culture and creativity, while emphasising that each sector has a distinctive identity, contribution and set of practical requirements. The neglect and underinvestment experienced across these sectors diminish Northern Ireland's cultural life, places and communities.

Research into the public benefits of heritage, culture and creativity is needed, and a coordinated programme may help establish a stronger evidence base. Such work should also recognise the intrinsic value of each sector, rather than measuring its importance solely through wider economic or social outcomes.

UAH supports appropriate income diversification and recognises the efforts already made by organisations to develop earned income. However, the scope for commercial income is uneven and often limited, particularly where statutory protection and public access requirements constrain revenue generation. Diversification must complement, not substitute for, a sustained improvement in public investment and funding arrangements.

Cross-sector collaboration should respect the distinct responsibilities of historic-environment protection and must not displace government accountability for adequately funding the conservation of irreplaceable heritage assets.

15. Implementation, monitoring and accountability

Relevant to all 17 proposed aims.

UAH recognises that the present consultation concerns the development of a strategic policy and that detailed implementation arrangements may be developed subsequently.

Nevertheless, the Society considers it essential that the emerging policy establish a

clear expectation of measurable delivery.

The Society recommends that the final policy be accompanied by an implementation framework identifying:

- The actions required to deliver each policy aim.
- The public body or partner responsible.
- Anticipated timescales.

- Funding and resource requirements.
- Measurable performance indicators.
- Arrangements for independent review and public reporting.

UAH recommends publication of an annual Historic Environment Report recording progress in relation to building condition, Heritage at Risk, enforcement, investment, council capacity, conservation-area management and other relevant indicators.

The proposed midpoint review should assess not only whether activities have been undertaken but whether they have produced demonstrable improvements in the condition and protection of Northern Ireland's historic environment.

Where progress is inadequate, the policy should provide for corrective action.

16. Conclusion

UAH welcomes the Department's commitment to developing a comprehensive Historic Environment Policy and broadly supports the vision and aims presented in the consultation documents.

The Society particularly welcomes the recognition that Northern Ireland's historic environment is deteriorating, that the existing system faces significant resource and capacity constraints, and that more effective leadership, investment and coordination are required.

However, the consultation evidence also demonstrates that the continuation of existing arrangements will not be sufficient to reverse current trends.

UAH therefore considers that the emerging policy must move beyond broad statements of ambition and establish a more effective framework for the protection, conservation and sustainable management of the historic environment.

The Society's four principal recommendations are:

1. Establish an overarching conservation objective.

Commit the policy explicitly to halting and reversing the deterioration and avoidable loss of Northern Ireland's historic environment, with measurable targets for improving condition and reducing Heritage at Risk.

2. Establish consistent regional conservation and planning standards.

Commit DfC and DfI to developing an updated Northern Ireland-wide planning framework establishing consistent core conservation principles and decisionmaking tests for nationally designated heritage assets, irrespective of council boundaries.

3. Strengthen heritage enforcement and accountability.

Develop an effective regional enforcement and intervention framework, clarify the respective responsibilities of HED and councils, and establish transparent monitoring of enforcement performance and outcomes.

4. Provide a properly funded delivery programme.

Commit to sustained investment in preventative maintenance, repair, conservation skills, Heritage at Risk intervention and sustainable reuse, alongside a programme to address financial and legislative barriers, supported by a clear implementation timetable and measurable outcomes.

UAH believes that the proposed Historic Environment Policy represents an important opportunity to address longstanding weaknesses in Northern Ireland's approach to heritage protection.

The evidence assembled by the Department provides a compelling justification for change.

The challenge now is to ensure that the final policy establishes the mechanisms, resources and accountability necessary to deliver that change.

The Society looks forward to continued engagement with the Department in developing and implementing a policy capable of securing a sustainable future for Northern Ireland's historic environment.