

**Democratic Services Section
Legal and Civic Services Department
Belfast City Council
City Hall
Belfast
BT1 5GS**



**Belfast
City Council**

9th September, 2026

PLANNING COMMITTEE

Dear Alderman/Councillor,

The above-named Committee will meet in hybrid format, both in the Lavery Room, City Hall and remotely, via Microsoft Teams, on Tuesday, 15th September, 2026 at 5.00 pm, for the transaction of the business noted below.

You are requested to attend.

Yours faithfully,

John Walsh

Chief Executive

AGENDA:

1. Routine Matters

- (a) Apologies
- (b) Minutes
- (c) Declarations of Interest

2. Matters Referred by the Council/Motions

- (a) Notice of Motion - Embedding Community Food Growing in the Planning Process for New Housing Developments (Pages 1 - 4)

3. Planning Appeals Notified (Pages 5 - 8)

4. Planning Decisions Issued (Pages 9 - 28)

5. Live Applications for Major Development (Pages 29 - 32)

6. Committee Decisions that have yet to issue (Pages 33 - 44)

7. **Miscellaneous Reports**

- (a) Consultation on a Historic Environment Policy for Northern Ireland by the Department for Communities. (Pages 45 - 346)
- (b) Consultation on the Tree Protection Bill for the Northern Ireland Assembly (Pages 347 - 388)
- (c) Consultation on proposed changes to the Classes and Thresholds in the Schedule to the Planning (Development Management) Regulations (Northern Ireland) 2015 by the Department for Infrastructure (Pages 389 - 446)

8. **Planning Applications**

- (a) **LA04/2026/0216/F** - Single-storey rear extension and 2-storey rear and side extension - 1 Cricklewood Crescent (Pages 447 - 466)
- (b) **LA04/2026/1207/LBC** - Enabling works for safe access and asbestos removal to allow condition survey to occur. - Wilmont House, Sir Thomas and Lady Dixon Park, 243 Upper Malone Rd (Pages 467 - 474)
- (c) **LA04/2026/0890/F** - The proposed regeneration of an existing open space. The scheme includes permeable surfaces, Sustainable Drainage Systems (SuDS), surface water management, improved/new paths and associated landscaping works. - The open space directly to the south of 2-20 Distillery Street and 9-11 Blackwater Way (Pages 475 - 486)

9. **Restricted Items**

- (a) **LA04/2025/0605/F** - Erection of a four storey building to create 29no. short-term let accommodation units with ancillary roof-mounted solar panels. - 341-345 Albertbridge Road, Ballymacarret (Report to follow)
- (b) **LA04/2024/0570/F** - Change of use of an existing hotel, conference centre and offices (sui generis) to a 97-bed care home (Use Class C3(b)) and 1,559sqm diagnostic medical facility (Use Class D1(a)), associated access, car parking, landscaping and open space. - Stormont Hotel, 587 Upper Newtownards Road; and **LA04/2024/0569/O** - Outline planning permission with all matter reserved for independent living (Use Class C1) units and up to 62no. assisted living units (Use Class C3), associated internal access roads, communal open space, revised access from Castlevue Road, associated car parking, servicing, amenity space and landscaping and demolition of dwellings at Castlevue Road (nos. 2, 4, 6, 16, 18, 20, 22, 24, 26, 28 & 30) and Summerhill Parade (nos. 18, 20 & 22) (amended description). - Stormont Hotel, 587 Upper Newtownards Road BT4 3LP and adjacent properties at Castlevue Road (nos. 2, 4, 6, 16, 18, 20, 22, 24, 26, 28 & 30), Summerhill Parade (nos. 18, 20 & 22), and rear of 160 Barnett (Pages 487 - 512)
- (c) Quarter 4 Finance Report - 2025/2026 (Pages 513 - 518)

This page is intentionally left blank



Subject:	Notice of Motion – Embedding Community Food Growing in the Planning Process for New Housing Developments
Date:	15th September, 2026
Reporting Officer:	Carolyn Donnelly, Committee Services Officer
Contact Officer:	Carolyn Donnelly, Committee Services Officer

Restricted Reports	
Is this report restricted?	Yes ☐ No ☒

Call-in	
Is the decision eligible for Call-in?	Yes ☒ No ☐

1.0	Purpose of Report or Summary of main Issues
1.1	To consider a motion re: Embedding Community Food Growing in the Planning Process for New Housing Developments, which was referred to the Committee by the Standards and Business Committee at its meeting on 26th May 2026.
2.0	Recommendations
2.1	The Committee is requested to note the receipt of the motion and to take such action thereon as may be determined.

3.0	Main report
3.1	<u>Key Issues</u> At the meeting of the Standards and Business Committee held on 26th May 2026, the following motion, which was proposed by Councillor Doherty and seconded by Councillor McCusker, was referred to the Committee for consideration:
3.2	<u>Embedding Community Food Growing in the Planning Process for New Housing Developments</u> “This Council recognises Belfast’s status as a Right to Food City and affirms that the planning system has an important role to play in building healthier, more sustainable and more food-resilient communities. Council notes that new housing developments should not only provide homes, but should also contribute to the long-term health, wellbeing, sustainability and resilience of the communities in which they are built. Council further notes that Belfast’s existing policy framework already recognises the importance of open space, residential amenity, placemaking, biodiversity, climate resilience, health and wellbeing, and that Council strategies also acknowledge the value of allotments, community gardens and local food growing. Council agrees that officers bring forward a report examining how Belfast City Council, through its planning powers, planning policy framework and development management processes, could introduce a planning requirement or policy approach to ensure appropriate space for community food growing is considered and, where feasible, incorporated into new social and private housing developments. This should include consideration of allotments, community gardens, orchards, raised beds, edible landscaping and other forms of productive green space. The report should examine how this could be progressed through the Local Development Plan, Supplementary Planning Guidance, residential design guidance, Health Impact Assessment guidance, planning application validation requirements, planning conditions, developer contributions, Section 76 planning agreements or any other relevant planning mechanism. Council agrees that this would represent a practical and innovative next step in giving meaning to Belfast’s status as a Right to Food City, placing food resilience, health and community wellbeing at the heart of how our city is planned and developed.”
3.3	<u>Financial and Resource Implications</u> None at this stage as there is no commitment to proceed with the Notice of Motion. Details of any financial and resource implications will be reported at a subsequent meeting.
3.4	<u>Equality or Good Relations Implications/Rural Needs Assessment</u> None associated with this report at this stage of the process.

This page is intentionally left blank

PLANNING COMMITTEE – 15 SEPTEMBER 2026

APPEALS NOTIFIED

COUNCIL: BELFAST

ITEM NO	1	PAC REF	2026/A0058
PLANNING REF:	LA04/2026/0082/F		
APPLICANT:	Mrs Shuhan Yang		
LOCATION:	215a Templemore Avenue, Belfast, BT5 4FS		
PROPOSAL:	Change of use from 1-bedroom residential apartment (C1) to short-term let for a maximum of 90 days per calendar year		
PROCEDURE:			

ITEM NO	2	PAC REF	2026/A0076
PLANNING REF:	LA04/2024/1646/F		
APPLICANT:	Mr Alan Pollock		
LOCATION:	46-50 Gilnahirk Road, Belfast, BT5 7DG		
PROPOSAL:	Demolition of existing dwelling (No 50 Gilnahirk Road) to facilitate proposed extension and alterations to existing petrol station including extension of retail floorspace, extension and realignment of car park to provide 9 No additional car parking spaces and pedestrian access, cycle parking, construction of retaining wall and associated landscaping		
PROCEDURE:			

ITEM NO	3	PAC REF	2026/E0062
PLANNING REF:	LA04/2026/0138/CA		
APPLICANT:	Mrs Maria McAllister		
LOCATION:	Land at 7 Pakenham Mews, Malone Lower, Belfast, BT7 1XA		
PROPOSAL:	Alleged unauthorised change of use of 7 Pakenham Mews, Malone Lower, Belfast, BT7 1XA from a dwelling house to short-term let accommodation, without the benefit of planning permission		
PROCEDURE:			

APPEALS NOTIFIED (CONTINUED)

ITEM NO	4	PAC REF	2026/E0063
PLANNING REF:	LA04/2026/0134/CA		
APPLICANT:	Mrs Maria McAllister		
LOCATION:	Land at 3 Pakenham Mews, Malone Lower, Belfast, BT7 1XA		
PROPOSAL:	Alleged unauthorised change of use of 3 Pakenham Mews, Malone Lower, Belfast, BT7 1XA from dwelling house to short-term let accommodation		
PROCEDURE:			

APPEAL DECISIONS NOTIFIED

ITEM NO	1	PAC REF:	2025/A0090
PLANNING REF:	LA04/2022/1046/F		
RESULT OF APPEAL:	ALLOWED		
APPLICANT:	Cregagh Developments Ltd		
LOCATION:	18 Annadale Avenue, Belfast, BT7 3JH		
PROPOSAL:	Proposed demolition of existing building and construction of a residential development consisting of 14 No. units (9 No. apartments within a three storey building and 5 No. two storey terraced dwellings) with associated landscaping and car parking (amended description)		

ITEM NO	2	PAC REF:	2025/A0126
PLANNING REF:	LA04/2025/0122/F		
RESULT OF APPEAL:	ALLOWED		
APPLICANT:	Mr Philip Young		
LOCATION:	Lands between 14 and 16 Lancedean Road, Belfast, BT6 9QP		
PROPOSAL:	Demolition of 4 No garages and erection of 2 No semi detached dwellings, part 2 storey part 3 storey		

APPEAL DECISIONS NOTIFIED (CONTINUED)

ITEM NO	3	PAC REF:	2026/N0001
PLANNING REF:	LA04/2026/0871/F		
RESULT OF APPEAL:	WITHDRAWN		
APPLICANT:	Phoenix Wine & Spirit Stores Ltd		
LOCATION:	Land to the north of 10-18 Queen Street, Land to the rear and north of 11a Fountain Street and Land to the south of 33-63 Castle Street, Belfast		
PROPOSAL:	Temporary erection (for 3 years) of 2 No padel courts and shipping containers to form an outdoor food/beverage and retail market with associated covered canopies, seating, alterations to existing on site parking (public) and toilets along with associated development		
ITEM NO	4	PAC REF:	2025/A0081
PLANNING REF:	LA04/2024/1466/F		
RESULT OF APPEAL:	DISMISSED		
APPLICANT:	Hanrose Ltd		
LOCATION:	41 Rosetta Road, Belfast, BT6 0LR		
PROPOSAL:	Ground floor extension and alterations to provide 1 No retail unit. Two storey rear extension. Rear dormer. Change of use of first and second floor level and part of ground floor level to 6 bed/6 person HMO		
ITEM NO	5	PAC REF:	2026/A0032
PLANNING REF:	LA04/2026/0771/DC		
RESULT OF APPEAL:	WITHDRAWN		
APPLICANT:	Mr James Bradley		
LOCATION:	45 Malone Park BT9 6NL		
PROPOSAL:	Discharge of condition. No demolition works shall commence until a Demolition Materials Recovery Plan (DMRP) has been submitted to and approved in writing by the Council. The DMRP shall include: 1. A full audit of all materials arising from the demolition, identifying materials capable or reuse, recycling, or recovery. 2. A schedule of salvage, detailing, quantities, or materials to be salvaged and the methods for their careful removal. 3. A reuse and destination plans, specifying how each category or salvaged material will be used within the development or, where reuse on site is not practicable, the proposed destination and method of recycling or recovery.		

APPEAL DECISIONS NOTIFIED (CONTINUED)

ITEM NO	6	PAC REF:	2025/E0080
PLANNING REF:	LA04/2021/0008/CA		
RESULT OF APPEAL:	ENFORCEMENT NOTICE QUASHED		
APPLICANT:	Mr Jonathan Caldwell		
LOCATION:	Land at 18b Newforge Lane, Belfast, BT9 5NW		
PROPOSAL:	Alleged erection of an unauthorised shed without the benefit of planning permission or permitted development rights as detailed in The Planning (General Permitted Development) Order (Northern Ireland) 2015		

COSTS CLAIM DECISION

ITEM NO	6	PAC REF:	2025/E0080
PLANNING REF:	LA04/2021/0008/CA		
RESULT OF APPEAL:	COSTS CLAIM DENIED		
APPLICANT:	Mr Jonathan Caldwell		
LOCATION:	Land at 18b Newforge Lane, Belfast, BT9 5NW		
PROPOSAL:	Alleged erection of an unauthorised shed without the benefit of planning permission or permitted development rights as detailed in The Planning (General Permitted Development) Order (Northern Ireland) 2015		

Planning Application Decisions issued August 2026 - No 165

<u>Application number</u>	<u>Category</u>	<u>Location</u>	<u>Proposal</u>	<u>Decision</u>
LA04/2025/1093/O	LOC	Lands to the rear of 43 Colinglen Road, Belfast, BT17 0LW (amended address)	Proposed erection of detached dwelling.	Permission Refused
LA04/2026/0688/F	LOC	25 Rosewood Street, Belfast, BT14 7AF	Elevational alterations to front and rear elevations	Permission Granted
LA04/2026/0894/F	LOC	2 Innisfayle Park, Belfast, BT15 5HS	Single storey rear and side extensions and patio	Permission Granted
LA04/2026/1172/LBC	LOC	Glendinning House, 6 Murray Street, Belfast, Belfast, BT1 6DN	Removal of existing windows to Athol Street Elevation and the installation of new windows and associated works.	Consent Granted
LA04/2025/1163/F	LOC	Lands Immediately east of No. 24 Landseer Street Belfast BT9 5AL and immediately west of No's 1-9 Colenso Parade, Belfast, BT9 5AN	Proposed erection of 8 no. townhouses and all associated site works	Permission Granted
LA04/2026/0246/F	LOC	294-296 Albertbridge Road, Ballymacarret, Belfast, BT5 4GX	Proposed demolition of existing building and construction of 7no. apartments and 1no. retail unit.	Application Withdrawn
LA04/2026/0333/F	LOC	7 Glanleam Drive, Belfast, BT15 6FL	Demolition of existing single storey rear return. Single storey rear extension. Loft conversion including flat roofed rear dormer and front rooflight and associated works.	Permission Granted
LA04/2026/0371/DC	LOC	Royal Ulster Agricultural Society The Kings Hall 488-516 Lisburn Road, Malone Lower, Belfast, BT9 6GW	Discharge of condition 28 - LA04/2020/0845/O- CEMP Plot 9	Condition Not Discharged
LA04/2026/0474/LBC	LOC	Student Roost, John Bell House College Square East, Belfast, BT1 6DJ	Listed building consent for the installation of kitchenettes to existing bedrooms and the installation of a tea station and associated works	Consent Granted

LA04/2026/0640/CLEUD	LOC	38 Damascus Street, Belfast, BT7 1QQ	Existing House of multiple occupation (HMO)	Permitted Development
LA04/2026/0766/CLEUD	LOC	11 Stranmillis Street, Belfast, BT9 5FE	HMO (House in multiple occupation)	Permitted Development
LA04/2026/1102/CLEUD	LOC	28 Camden Street, Belfast, BT9 6AU	Continuation of use as a seven unit House in Multiple Occupation (HMO)	Application Required
LA04/2026/1349/CLEUD	LOC	Flat 1 79 Fitzroy Avenue, Belfast, BT7 1HT	House In Multiple Occupation (HMO Existing Use)	Permitted Development
LA04/2026/1357/CLEUD	LOC	Flat 2 79 Fitzroy Avenue, Belfast, BT7 1HT	House In Multiple Occupation (HMO Existing Use)	Permitted Development
LA04/2026/1352/CLEUD	LOC	Flat 3 79 Fitzroy Avenue, Belfast, BT7 1HT	House In Multiple Occupation (HMO Existing Use)	Permitted Development
LA04/2025/0470/F	LOC	7 Coolmoyne Park, Belfast, BT15 5HG	Rear single storey extension and raised patio. (Amended Scheme)	Permission Granted
LA04/2025/1864/F	LOC	549 Ormeau Road, Ormeau, Belfast, BT7 3JA	De-conversion of 3 flats back to original dwelling, fenestration changes, demolition & alterations to chimney demolition of rear internal wall, removal of fence, new garage door to rear and associated site works (Amended Proposal Description)	Permission Granted
LA04/2025/1865/LBC	LOC	549 Ormeau Road, Ormeau, Belfast, BT7 3JA	De-conversion of 3 flats back to original dwelling, fenestration changes, demolition & alterations to chimney demolition of rear internal wall, removal of fence, new garage door to rear and associated site works (Amended Proposal Description)	Consent Granted

LA04/2025/2194/F	LOC	28 Rosepark East, Belfast, BT5 7RL	Two storey side and rear extension and raised rear terrace with pergola. Alterations to boundary with widened access and new hardstanding. Extension to existing garden store to rear.	Permission Granted
LA04/2026/0460/F	LOC	Street Lighting Column on land to the front of 51-55 Rosemary Street approximately 13 metres from the junction with Royal Avenue, Belfast	Installation of telecommunications equipment to be attached to an upgraded street lighting column.	Permission Granted
LA04/2026/0641/F	LOC	Creightons Of Finaghy, 87-89 Upper Lisburn Road, Finaghy, Belfast, BT10 0GY	Improvement works to existing petrol filling station forecourt, including decommissioning of existing underground fuel tanks which are to remain in situ, installation of two new 50,000-litre underground fuel tanks, and new cladding to existing underside of canopy.	Permission Granted
LA04/2026/0696/F	LOC	2 Cairo Street, Belfast, BT7 1QS	Two storey rear extension and associated demolition works.	Permission Granted
LA04/2026/0647/CLEUD	LOC	65 Haypark Avenue, Belfast, BT7 3FE	House in Multiple Occupation (HMO)	Application Required
LA04/2026/0681/F	LOC	39 Orpen Park, Belfast, BT10 0BN	Part single-storey rear extension and part two-storey rear and side extension; addition of a first floor to existing garage with rear external stair.	Permission Granted
LA04/2026/1177/A	LOC	The Doyen, 829 Lisburn Road, Malone Lower, Belfast, BT9 7GY	1 Digital sign	Consent Granted
LA04/2026/1185/DC	LOC	8-10 Clarence Street 27-37 Linenhall Street and existing car park at the corner of Linenhall Street and Clarence Street Belfast	Discharge condition 4 of planning approval LA04/2020/2200/F Archaeological Programme of Works prepared by Gahan and Long	Condition Discharged

LA04/2026/1216/NMC	LOC	1 Willesden Park, Belfast, BT9 5GX	Non Material Change to LA04/2024/0342/F: Addition of matching ground floor high level obscure window to match that already previously approved to elevation to provide improved symmetry to elevation and light to internal of extension.	Non Material Change Granted
LA04/2026/1305/CLEUD	LOC	Apartment 2 1 Eglantine Avenue, Belfast, BT9 6DW	House in Multiple Occupancy	Permitted Development
LA04/2026/1307/CLEUD	LOC	Apartment 3 1 Eglantine Avenue, Belfast, BT9 6DW	House of Multiple Occupancy	Permitted Development
LA04/2026/1314/CLEUD	LOC	Flat 2 14 Ashley Avenue, Belfast, BT9 7BT	House of Multiple Occupancy (HMO).	Permitted Development
LA04/2026/1326/CLEUD	LOC	63 Palestine Street, Belfast, BT7 1QL	House of Multiple Occupancy	Permitted Development
LA04/2024/1646/F	LOC	46-50 Gilnahirk Road, Belfast, BT5 7DG	Demolition of existing dwelling (no. 50 Gilnahirk Road) to facilitate proposed extension and alterations to existing petrol filling station including extension of retail floor space, extension and realignment of carpark to provide 9 no. additional car parking spaces and pedestrian access, cycle parking, construction of retaining wall and associated landscaping	Permission Refused
LA04/2025/1608/F	LOC	Lands approx. 35m North-East of 60 River Terrace, Belfast, bounded by the Lagan Walkway	Proposed two-storey boat store, including ancillary office and workshop.	Permission Granted

LA04/2026/0167/F	LOC	Glenmachan Tower House Nursing Home 13 Glenmachan Road, Belfast, BT4 2NN.	Internal alterations to existing nursing home to provide 4 additional bedrooms	Permission Granted
LA04/2026/0168/LBC	LOC	Glenmachan Tower House Nursing Home 13 Glenmachan Road, Belfast, BT4 2NN	Internal alterations to existing nursing home to provide 4 additional bedrooms	Consent Granted
LA04/2026/0243/F	LOC	32 Stormont Park, Belfast, BT4 3GX	Demolition of existing rear return of dwelling and erection of a single and two-storey rear extension with associated site works.	Permission Granted
LA04/2026/0500/F	LOC	58 Beechmount Street, Belfast, BT12 7NH	Two-storey rear extension.	Permission Granted
LA04/2026/0649/F	LOC	56 North Circular Road, Belfast, BT15 5FE	Single storey extension to the rear, including internal alterations and construction of a raised patio.	Permission Granted
LA04/2026/0896/F	LOC	37 Orchardville Avenue, Belfast, BT10 0JH	Rear dormer	Permission Granted
LA04/2026/0905/F	LOC	18 Ladybrook Park, Belfast, BT11 9EL	Single-storey rear extension, erection of garden room in rear garden with patio area.	Permission Granted
LA04/2026/0944/F	LOC	1 The Close, Belfast, BT10 0GG	Rear dormer extension	Permission Granted
LA04/2026/1176/NMC	LOC	Lands at Cabin Hill, Upper Newtownards Road, Belfast BT4	NMC to LA04/2024/0015/F: Removal of tree T140 and hedge group G134 to ensure visibility splays are unobstructed, and the addition of compensatory planting	Non Material Change Granted
LA04/2026/1151/CLEUD	LOC	11 Harrow Street, Belfast, BT7 1QG	House in Multiple Occupancy	Permitted Development
LA04/2026/1267/NMC	MAJ	Lands at Cabin Hill, Upper Newtownards Road, Belfast.	Amendment to condition No.13 of LA04/2024/0015/F to reflect updated Tree Impact and Protection Plan.	Non Material Change Granted

LA04/2026/1257/CLEUD	LOC	36 Carmel Street, Belfast, BT7 1QE	Existing House of multiple occupation (HMO)	Permitted Development
LA04/2026/0807/F	LOC	115 Knockbreda Park, Belfast, BT6 0HE	Single storey side extension, rear dormer. Alterations to existing garage with change of roof type, pitch to flat roof), elevational (height increase) and material changes (render to timber cladding).	Permission Granted
LA04/2026/1304/CLEUD	LOC	Apartment 1 1 Eglantine Avenue, Belfast, BT9 6DW	House in Multiple Occupancy	Permitted Development
LA04/2025/2090/F	LOC	38 Hillhead Avenue, Belfast, BT11 9GD	Creation of hardstanding and widening of vehicular access to front of dwelling. (Retrospective)	Permission Granted
LA04/2026/0783/F	LOC	19 Annadale Avenue, Ballynafoy, Belfast, BT7 3JJ	Single storey rear extension	Permission Granted
LA04/2026/1479/F	LOC	21 Meadowbank Street, Belfast, BT9 7FG	Proposed Change Of Use From A Residential Dwelling (Class C1) To 2no. one bed Short Term Let Accommodation (Sui-Generis) units 1no. 1 bed apartment	Application Withdrawn
LA04/2025/0796/F	LOC	14 Ben Madigan Park South, Newtownabbey, BT36 7PX	Excavate existing sloped portion of rear garden to form lower level area and installation of timber decking to form rear patio area. External installation of stair from external ground level to existing external upper balcony (Additional Plans)	Permission Granted
LA04/2025/1237/F	LOC	160-162 Castlereagh Road, Belfast, BT5 5FT	New click and collect parking bays, triple canopy, 1x Van loading Bay and 11xnew bollards	Permission Granted
LA04/2025/1767/F	LOC	Odyssey Pavilion, 2 Queens Quay, Belfast, BT3 9QQ	Facade improvements: removal of existing silver coloured composite cladding and replacement with same cladding.	Permission Granted

LA04/2025/2063/DC	LOC	3-19 (Former Warehouse) Rydalmere Street Rydalmere Street, Belfast, BT12 6GF	Discharge Condition 13 (Additional groundwater quality monitoring data and a Detailed Quantitative Risk Assessment) and 14 (Remediation Strategy) of planning permission LA04/2020/1943/F	Condition Discharged
LA04/2025/2087/F	LOC	21 Castle Avenue, Belfast, BT15 4GE	First floor side extension over existing garage and new flat roof to existing single storey rear extension and elevational changes.	Permission Granted
LA04/2025/2195/A	LOC	Queen's University Belfast School of Pharmacy, 97 Lisburn Road, Malone Lower, Belfast, BT9 7BL	Two Building Signs	Consent Granted
LA04/2026/0248/F	LOC	27 Etna Drive, Belfast, BT14 7LH	Two storey rear extension	Permission Granted
LA04/2026/0439/F	LOC	43 Bristol Avenue, Belfast, BT15 4AJ	2 storey rear extension at basement and ground floor level with decking area. Demolition of existing rear return	Permission Granted
LA04/2026/0543/F	LOC	8 Rosemount Gardens, Skegoneill, Belfast, BT15 5AG	Partial demolition of existing rear return and erection of single storey extension.	Permission Granted
LA04/2026/0723/F	LOC	16 Myrtlefield Park, Belfast, BT9 6NE	Single-storey rear and side extension, covered patio areas to rear, amended window fenestrations to rear first floor elevation and new door to side elevation at ground floor level.	Permission Granted
LA04/2026/0749/F	LOC	28 Malone Meadows, Belfast, BT9 5BG	Single storey rear extension, raised patio & steps to rear, door alterations to side elevation and 2 new windows to side elevation at ground floor level.	Permission Granted

LA04/2026/0753/F	LOC	2 Belvedere Park, Belfast, BT9 5GS	Demolition of 1 external chimney and new roof light to rear.	Permission Granted
LA04/2026/0765/DCA	LOC	16 Myrtlefield Park, Belfast, BT9 6NE	Demolition of existing side and rear conservatories, partial demolition of rear wall and windows, partial demolition of side walls and removal of doors and windows to side elevations.	Consent Granted
LA04/2026/1063/F	LOC	43 Stockmans Lane, Belfast, BT9 7JD	Single-storey rear extension with ramped access to front.	Permission Granted
LA04/2026/1354/CLEUD	LOC	Flat 1, 10 Donnybrook Street, Belfast, BT9 7DD	House in Multiple Occupation (HMO Existing Use)	Permitted Development
LA04/2026/1355/CLEUD	LOC	Flat 2 10 Donnybrook Street, Belfast, BT9 7DD	House In Multiple Occupation (HMO Existing Use)	Permitted Development
LA04/2026/1353/CLEUD	LOC	Flat 3, 10 Donnybrook Street, Belfast, BT9 7DD	House in Multiple Occupation (Existing HMO Use)	Permitted Development
LA04/2026/1369/CLEUD	LOC	18 Whitehall Gardens, Belfast, BT7 3GW	Short term let.	Permitted Development
LA04/2026/1372/F	LOC	Seven Star Chinese 41-43 Belmont Road, Belfast, BT4 2AA	Partial change of use to provide hot food on or off the premises	Application Withdrawn
LA04/2024/0077/F	LOC	76-86 Duncrue Street, Belfast, BT3 9AR	Section 54 application to vary condition 2 of planning approval Z/2014/0200/ regarding waste codes.	Permission Granted
LA04/2025/0921/F	LOC	11 Massey Avenue, Belfast, BT4 2JT	Proposed two-storey extensions to front, replacement of existing sunroom with single-storey extension to rear, dormer additions to rear and internal alterations (amended description).	Permission Granted
LA04/2025/2190/A	LOC	Whitla Medical Building 97 Lisburn Road, Malone Lower, Belfast, BT9 7BL	Installation of a high level sign fixed to the western elevation of the building.	Consent Granted

LA04/2025/2197/A	LOC	Medical Biology Centre, Queen's University Belfast 97 Lisburn Road, Malone Lower, Belfast, BT9 7BL	One Building Sign	Consent Granted
LA04/2026/0249/F	LOC	117 Fortwilliam Park, Belfast, BT15 4AS	First-floor rear extension and single-storey front porch extension with external changes to dwelling. Replacement of conservatory roof and provision of rear raised decking and steps.	Permission Granted
LA04/2026/0285/F	LOC	8-10 Winetavern Street, Belfast, BT1 1JQ	Proposed change of use from Vacant Office Space at first and second floors to an escape room	Permission Granted
LA04/2026/0722/F	LOC	76 Galwally Park, Belfast, BT8 6AH	Single-storey rear extension	Permission Granted
LA04/2024/0047/F	LOC	14 Balmoral Court, Belfast, BT9 7GR	Change of use from apartment to short term let	Permission Refused
LA04/2024/0961/F	LOC	442 Antrim Road, Belfast, BT15 5GB	Removal of condition 2 of Z/1996/2942 stating that the premises must be serviced from the Antrim Road.	Permission Granted
LA04/2025/0027/CLOPU D	LOC	87-91 Botanic Avenue, Belfast, BT7 1JN	Commencement of planning permission LA04/2016/0737/F [by way of laying of partial foundation] to allow future completion at a subsequent date	Permitted Development
LA04/2025/1042/F	LOC	75 Shankill Road, Belfast, BT13 1FD	Partial change of use of gospel hall to hot food takeaway/restaurant.	Permission Granted
LA04/2025/1116/F	LOC	Dundonald House Upper Newtownards Road, Belfast, BT4 3SB	Construction of 3m high security fence around Dundonald House.	Permission Granted
LA04/2025/1203/LBC	LOC	Dundonald House Upper Newtownards Road, Belfast, BT4 3SB	Construction of 3m high security fence around Dundonald House.	Consent Granted

LA04/2025/1407/F	LOC	38 Eglantine Avenue, Belfast, BT9 6DX	Conversion of Existing Short-Term Let to 5 No. 1-Bedroom Short-Term Let Apartments	Permission Granted
LA04/2025/1464/DCA	LOC	38 Eglantine Avenue, Belfast, BT9 6DX	Demolition works to facilitate conversion of Existing Short-Term Let to 5 No. 1-Bedroom Short-Term Let Apartments	Consent Granted
LA04/2025/1511/A	LOC	11-17 Corporation Street, Belfast, BT1 3BA	Two retrospective banner adverts	Consent Granted
LA04/2025/1763/CLEUD	LOC	6 The Cloisters, Belfast, BT7 1GD	Change of use from apartment to short term let	Application Required
LA04/2025/2054/F	LOC	9 Coolnasilla Gardens, Belfast, BT11 8LE	Construction of walls and pillars to front of dwelling, walls and fences to side and rear of dwelling and garden room. (Retrospective)	Permission Granted
LA04/2025/2136/F	LOC	Parkdean Care Home 44 Fortwilliam Park, Belfast, BT15 4AS	Proposed creation of front and rear landscaped garden areas, alterations to ground levels, new garden building, new boundary fencing and landscaping.	Permission Granted
LA04/2025/2174/NMC	LOC	42 Circular Road, Belfast, BT4 2GA	Non material change to LA04/2023/4203/F relating to: 1. Size and material of rear carport/balcony changed 2. Design of front elevation bay window changed 3. Change of roof type to kitchen roof 3. Removal of brick materials to render. 4. Addition of window to both side elevations.	Non Material Change Refused
LA04/2025/2196/A	LOC	Queens University Belfast Clinical Sciences Block, Royal Victoria Hospital, Grosvenor Road, Belfast, BT12 6BA	Two Building Signs	Consent Granted

LA04/2026/0021/F	LOC	Former Good Shepherd Centre at lands at Nos. 511 and 511a Ormeau Road Belfast BT7 3GS	Conversion of former convent to 28no. apartments (1, 2 & 3 bed) involving internal and external refurbishment/retention and re-configuration. Provision of ground floor extension with partial demolition and provision of new stairwell and lift. Provision of dormers, rooflights and extension to first, second floor and attic levels regarding new stairwell and lift. External layout reconfigurations to include construction of new access from Ormeau Road, amended parking layout, provision of cycle parking, bin stores, landscaping, substation and associated works.	Permission Granted
LA04/2026/0022/LBC	LOC	Former Good Shepherd Centre at lands at Nos. 511 and 511a Ormeau Road Belfast BT7 3GS	Conversion of former convent to 28no. apartments (1, 2 & 3 bed) involving internal and external refurbishment/retention and re-configuration. Provision of ground floor extension with partial demolition and provision of new stairwell and lift. Provision of dormers, rooflights and extension to first, second floor and attic levels regarding new stairwell and lift. External layout reconfigurations to include construction of new access from Ormeau Road, amended parking layout, provision of cycle parking, bin stores, landscaping, substation and associated works.	Consent Granted

LA04/2026/0015/F	LOC	203 York Road (First Floor), Belfast, BT15 3HB	Change of use and renovation of vacant first floor Public House to a Veteran Community Hub (Class D1), with internal alterations to provide 2no. contained offices.	Permission Granted
LA04/2026/0272/F	LOC	93 Knockbreda Road, Belfast, BT6 0JD	2 Storey rear extension (amended plans).	Permission Granted
LA04/2026/0352/A	LOC	Lands directly south of Titanic Belfast and North-West of Hamilton Dock located off Queen's Road, Belfast. (Hamilton Dock Hotel)	Erection of signage for hotel development approved under planning permission LA04/2023/3442/F, comprising 3 no. internally illuminated signs to hotel elevations.	Consent Granted
LA04/2026/0593/F	LOC	88 Galwally Park, Belfast, BT8 6AH	2-storey side extension and conversion of single-storey rear conservatory to sun room.	Permission Granted
LA04/2026/0579/F	LOC	19 Kings Crescent, Belfast, BT5 6PR	Single storey rear extension. Replacement of rear window. New windows to side elevations (amended plans/description).	Permission Granted
LA04/2026/0594/F	LOC	3 Upper Malone Road, Belfast, BT9 6TD	Retrospective Application for construction of a rear conservatory extension and rear boundary fence.	Permission Granted
LA04/2026/0590/DC	LOC	237 Lower Braniel Road, Belfast, BT5 7NQ	Discharge of condition no.5 of LA04/2022/2158/F relating to foul and surface water drainage	Condition Discharged
LA04/2026/0607/DC	LOC	484 Upper Newtownards Road, Belfast, BT4 3GZ	LA04/2022/0061/F - discharge of condition 4 - Acoustic Assessment report	Condition Not Discharged

LA04/2026/0687/F	LOC	61 Donegall Road, Belfast, BT12 5JL	Retrospective change of use from 3-bedroom dwelling (Class C1) to short term let accommodation (Sui Generis) with one bedroom retained as permanent residential.	Permission Granted
LA04/2026/0705/A	LOC	Odyssey Pavilion 2 Queens Quay, Belfast, BT3 9QQ	8 internally illuminated signs	Consent Granted
LA04/2026/0792/F	LOC	Osborne Buildings, Unit 1, 715-719 Lisburn Road, Belfast, BT9 7GU	Retrospective change of Use of Unit 1 from Retail Unit to Pilates & Fitness Studio (Retrospective)	Permission Granted
LA04/2026/0718/F	LOC	16 Northbrook Gardens, Belfast, BT9 7EA	Single-storey side and rear extension to include partial demolition of existing side and rear walls of dwelling and new boundary fence to front and side.	Permission Granted
LA04/2026/0731/F	LOC	51 Westland Road, Belfast, BT14 6NJ	Single storey rear extension to existing dwelling with raised patio.	Permission Granted
LA04/2026/0736/DC	LOC	Kilbroney House Greenway, Belfast, BT6 0EY	Discharge Condition 2 of Planning Approval LA04/2024/1607/F- CEMP	Condition Not Discharged
LA04/2026/0739/F	LOC	3 Malone Park, Belfast, BT9 6NH	Erection of new vehicular entrance pillars and gates, creation of pedestrian access to front of site and erection of new pedestrian pillars and gate.	Permission Granted
LA04/2026/0742/DCA	LOC	3 Malone Park, Belfast, BT9 6NH	Demolition of existing vehicle entrance pillars and gates, partial removal of hedge to front boundary.	Consent Granted
LA04/2026/0794/F	LOC	48 Suffolk Crescent, Belfast, BT11 9JT	Single storey rear extension to provide bathroom facilities; also provide ramped access at side.	Permission Granted
LA04/2026/0758/F	LOC	5 Grangeville Gardens, Belfast, BT10 0HJ	2-Storey rear extension.	Permission Granted

LA04/2026/0840/F	LOC	Rosetta Clear Dental 61-63 Rosetta Road, Belfast, BT6 0LR	Change of Use of First Floor from Dental Surgery (Class D1) to Office (Class B1).	Permission Granted
LA04/2026/0809/F	LOC	22-24 Berry Street, Belfast, BT1 1FJ	Alteration to shopfront, including the removal and replacement of existing windows and doors with glazed frontage and entrance door	Permission Granted
LA04/2026/0810/DCA	LOC	22-24 Berry Street, Belfast, BT1 1FJ	Demolition of existing shopfront to allow for alterations	Consent Granted
LA04/2026/0808/A	LOC	22-24 Berry Street, Belfast, BT1 1FJ	1 No. fascia sign and 2 No. illuminated projecting signs	Consent Granted
LA04/2026/0773/F	LOC	92 Ramoan Gardens, Belfast, BT11 8LN	Roofspace conversion with rear dormer and front rooflight (Retrospective)	Permission Granted
LA04/2026/0812/F	LOC	Quarry Bank 56 Quarry Road, Belfast, BT4 2NQ	2 storey extension	Permission Granted
LA04/2026/0811/DC	LOC	14 Dublin Road, Belfast, BT2 7HN	Discharge of Condition 8 of LA04/2023/4373/F - SUDs and drainage details	Condition Discharged
LA04/2026/0897/F	LOC	40 Dunmurry Lodge, Belfast, BT10 0GR	Single storey rear extension. Replacement of pitched roof over existing rear return with flat roof and rendering of ground floor elevations to side and rear of property.	Permission Granted
LA04/2026/0893/F	MAJ	Lands at Plot 4 of Kings Hall Healthcare Village, west of 25 Harberton Park and north of 27 Harberton Crescent	Application to vary condition 3 of LA04/2022/0311/F to include additional use class D1(a) - Medical or Health services.	Permission Granted
LA04/2026/0935/DC	LOC	Milewater Service Centre 25 Duncrue Street, Belfast, BT39AR	Discharge Condition 6 of Planning Approval LA04/2016/1691/F Verification Report	Condition Not Discharged

LA04/2026/0940/F	LOC	17 Kingsland Park, Belfast, BT5 7FB	First floor side extension, first floor rear extension and fenestration changes	Permission Granted
LA04/2026/0998/F	LOC	Santander Uk Plc 6 Royal Avenue, Belfast, BT1 1DA	External works to existing bank to include installation of new entrance doors, replacement of shutter above door with new solid section, provision of an accessibility ramp and replacement of existing ATM to front exterior elevation. (Amended description)	Permission Granted
LA04/2026/0942/LBC	LOC	Santander Uk Plc 6 Royal Avenue, Belfast, BT1 1DA	minor external and internal alterations to include the installation of new entrance doors, replacement of shutter above door with new solid section, provision of an accessibility ramp, replacement of existing ATM to front elevation, repainting of existing window frames, 1 internal digital media screen, 1 logo sign to entrance door, 2 projecting signs and window graphics to inside of windows, redecoration of interior, floor replacement and removal of some partitions on first floor mezzanine level and installation of new balustrade with other internal reconfiguration works. (Amended description)	Consent Granted
LA04/2026/0941/A	LOC	Santander Uk Plc 6 Royal Avenue, Belfast, BT1 1DA	1 internal digital media screen, 1 logo sign to entrance door, 2 projecting signs and window graphics to inside of windows.	Consent Granted

LA04/2026/0948/WPT	LOC	12b Windsor Park, Belfast, BT9 6FQ	Betula Pendula Tree Removal Remove 1x Betula Pendula at the rear of the property.	Works to Trees in CA Agreed
LA04/2026/0956/DC	LOC	197-199 Castlereagh Road, Belfast, BT5 5FH	Condition 4 of LA04/2023/3591/F. Verification Report	Condition Discharged
LA04/2026/1017/F	LOC	16 Norwood Park, Belfast, BT4 2DY	First Floor Rear Extension and minor changes to front elevation.	Permission Granted
LA04/2026/0982/F	LOC	47 Diamond Gardens, Finaghy, Belfast, BT10 0HE	Proposed single storey extension to rear of dwelling.	Permission Granted
LA04/2026/0970/F	LOC	60 Stewartstown Avenue, Belfast, BT11 9GF	Single storey, side extension and ramped access	Permission Granted
LA04/2026/0996/F	LOC	10 Hawthornden Gardens, Belfast, BT4 2HF	Two storey rear extension, demolition of existing garage, single storey side extension. Ground and first floor window to Western elevation.	Application Withdrawn
LA04/2026/1018/F	LOC	5 Diamond Avenue, Belfast, BT10 0HG	Single-storey front extension and fenestration changes (Amended description)	Permission Granted
LA04/2026/1024/CLOPUD	LOC	13 Chichester Avenue, Belfast, BT15 5EH	Single-storey rear extension	Permitted Development
LA04/2026/1041/DC	LOC	Ballysillan Playing Fields, Ballysillan Road, Belfast, BT14 7QP	Flood Risk and Drainage Assessment and Schedule 6 consent (see cover letter). Discharge of condition 16 - LA04/2022/0136/F	Condition Discharged
LA04/2026/1065/F	LOC	143 Orby Drive, Belfast, BT5 6BB	Single storey rear extension.	Permission Granted
LA04/2026/1061/F	LOC	16a Maryville Park, Belfast, BT9 6LN	Extension to rear of existing garage. (Amended proposal and description).	Permission Granted
LA04/2026/1081/CLOPUD	LOC	2 Pilot Street, Belfast, BT1 3AH	Change of use from bookmakers (Suis generis) to shop (A1).	Permitted Development
LA04/2026/1064/F	LOC	8 Serpentine Parade, Newtownabbey, BT36 7HD	Single storey rear extension	Permission Granted
LA04/2026/1076/F	LOC	5 Forest Lane, Belfast, BT17 0YT	Single-storey side and rear extension and dormer to rear roof.	Permission Granted

LA04/2026/1060/F	LOC	134 Alexandra Park Avenue, Skegoneill, Belfast, BT15 3GJ	Rear single storey extension.	Permission Granted
LA04/2026/1082/CLOPUD	LOC	Amazon Belfast Depot, Channel Commercial Park, Queens Road, Titanic Quarter, Belfast, BT3.	Proposed Internal Mezzanine floor.	Permitted Development
LA04/2026/1084/DCA	LOC	16a Maryville Park, Belfast, BT9 6LN	Demolition of garage roof, partial demolition of garage walls.	Consent Granted
LA04/2026/1129/DC	LOC	Lands at the Gasworks Northern Fringe site; bounded to the north by McAuley Street Stewart Street and Raphael Street; Cromac Street to the west; the River Lagan and Belfast-Newry railway line to the east; and the Gasworks Business Park to the south.	Discharge Conditions 6 & 12 of Planning Approval LA04/2021/1672/O Verification Report for Blocks 7, 9 and the apartments of Block 12 of Site D. Please see accompanying Cover Letter for further details.	Condition Discharged
LA04/2026/1149/DC	LOC	29 Parkside Gardens, Belfast, BT15 3AW	Discharge condition 6 of LA04/2021/2285/F. Verification Report for a Remedial capping System, Social Housing Development at 29 Parkside Gardens Belfast	Condition Not Discharged
LA04/2026/1187/F	LOC	19 Kerrykeel Gardens, Belfast, BT11 9HR	Rear dormer	Permission Granted
LA04/2026/1138/F	LOC	10 Maple Hill, Belfast, BT10 0PZ	Retrospective Domestic Outbuilding to Rear Garden (amended design of approval LA04/2023/2882/F)	Permission Granted
LA04/2026/1162/A	LOC	38-52 Lisburn Road, Belfast, BT9 6AA	4 No. building fascia non-illuminated signs	Consent Granted
LA04/2026/1150/DC	LOC	Ground floor, Lagan House, 19 Clarendon Road, Belfast	Discharge of condition 2 (landscaping) of planning permission LA04/2025/0880/F	Condition Not Discharged
LA04/2026/1165/A	LOC	City Quays 3 Clarendon Road, Belfast, BT1 3BG	Installation of 2 no. illuminated signs to the external North and South elevations of the building.	Consent Granted

LA04/2026/1414/CLEUD	LOC	3 The Cloisters, Belfast, BT7 1GD	Short term holiday let	Permitted Development
LA04/2026/1258/CLOPUD	MAJ	Casement Park Lands at 88-104 Andersonstown Road and between 36-42 Mooreland Park and 200-206 Stockman's Lane, Belfast, BT11 9AN	The works comprised the installation of 5no. bearing piles forming part of the foundations for the new west stand for the planning permission.	Permitted Development
LA04/2026/1281/DC	LOC	Lands at the Titanic Quarter, between Hamilton Road, Queens Road and Sydenham Road. Immediately NE, E and SE of Belfast Metropolitan College, approximately 150m SE of Titanic Hotel, 8 Queens Road, Belfast, BT3 9DT.	Discharge of condition 5 of Planning approval LA04/2026/0393/F - Verification Report	Condition Discharged
LA04/2026/1302/F	LOC	15 Brians Well Grove, Dunmurry, Belfast, BT17 0YQ	Single storey rear extension	Permission Granted
LA04/2026/1291/F	LOC	57 Deramore Park South, Malone Upper, Belfast, BT9 5JY	Demolition of sunroom for single storey rear flat roof extension.	Permission Granted
LA04/2026/1318/DC	LOC	11-13 Templemore Avenue, Belfast, BT5 4FP	PDE as issued by NI Water Discharge of condition 2 - LA04/2025/1131/F	Condition Not Discharged
LA04/2026/1362/CLEUD	LOC	Apartment 1, 9 Chlorine Gardens, Belfast, BT9 5DJ	House in Multiple Occupation (HMO)	Permitted Development
LA04/2026/1365/CLEUD	LOC	Apartment 2, 9 Chlorine Gardens, Belfast, BT9 5DJ	House in Multiple Occupation (HMO)	Permitted Development
LA04/2026/1366/CLOPUD	LOC	140 University Street, Belfast, BT7 1HH	Proposed change of use from offices to a 3 bed residential flat on first and second floors. Retention of offices on ground floor.	Permitted Development
LA04/2026/1376/CLEUD	LOC	93 Wellesley Avenue, Belfast, BT9 6DH	Existing House of multiple occupation (HMO)	Permitted Development
LA04/2026/1379/CLEUD	LOC	Apartment 3, 9 Chlorine Gardens, Belfast, BT9 5DJ	House in Multiple Occupation (HMO)	Permitted Development

LA04/2026/1380/CLEUD	LOC	Apartment 4, 9 Chlorine Gardens, Belfast, BT9 5DJ	House in Multiple Occupation (HMO)	Permitted Development
LA04/2026/1381/CLEUD	LOC	Apartment 5, 9 Chlorine Gardens, Belfast, BT9 5DJ	House in Multiple Occupation (HMO)	Permitted Development
LA04/2026/1371/F	LOC	Nationwide Bldg Soc 57-63 Donegall Place, Belfast, BT1 5AG	Installation of solar powered stand containing a defibrillator and a bleed kit outside of Nationwide Building Society.	Application Withdrawn
LA04/2026/1374/WPT	LOC	3 Red Hall Lane, Belfast, BT4 2FA	Sycamore tree in back garden on Southwest corner within the border hedge-line between 3 Red Hall Lane and 107 Circular Rd. Permission to carry out a crown reduction on 1 x sycamore tree – reduce the top of the crown by 5m - 7m, reduction on side branches by 2m – 3m with removal of deadwood and dieback and crown lift low hanging branches.	Works to TPO Granted
LA04/2026/1375/CLEUD	LOC	9 Rathdrum Street, Belfast BT9 7GB	House of Multiple Occupancy (HMO)	Permitted Development
LA04/2026/1439/WPT	LOC	49 Osborne Park, Belfast, BT9 6JP	Works to trees in a Conservation Area	Works to Trees in CA Agreed
				<u>Total Decisions</u>

This page is intentionally left blank

Live Major Applications not previously considered by Committee @ 08.09.26

Number	Application No.	Category	Location	Proposal	Date Valid	Target Date	Status
1	LA04/2023/3799/F	Major	Vacant lands (partial site of the former Wolfhill Flax Spinning Mill) located to the south, of Wolfhill Manor, north of Wolfhill Grove and west of Mill Avenue, Ligoniel Road, Belfast, BT14 8NR	New single storey 10-class based primary school, separate nursery school accommodation and school meals accommodation to facilitate the relocation of St. Vincent De Paul Primary School and Nursery from existing site on Ligoniel Road, Belfast. Proposal includes new pedestrian and vehicular accesses onto Mill Avenue, car parking, covered cycle storage area and hard play areas. Hard and soft landscaping including wildlife walkway, fencing, retaining walls, underground drainage system to include the reinstatement of underground storm sewer and headwall into adjacent DFI River wayleave. Includes temporary contractors compound and all associated site works.	09-Oct-23	06-May-24	Under Consideration
2	LA04/2023/4181/F	Major	Lands comprising the existing Sydenham Wastewater Pumping Station west of Park Avenue, Connswater River and King George V Playing Fields, to the south of the Sydenham By-Pass, east of The Oval football stadium, north and east of Parkgate Gardens and north of Parkgate Crescent, Parkgate Parade and Mersey Street, Belfast	Demolition of existing Wastewater Pumping Station (WwPS) with reinstatement of site as a landscaped area. Construction of a replacement WwPS including associated control building and hardstanding, the raising of site levels, in-channel works, provision of new rising main, other ancillary buildings, the creation of an access road on lands within the King George V Playing Fields to serve the facility, landscaping and other ancillary works. Provision of a temporary working area on lands within the King George V Playing Fields, the creation of a temporary access road from Mersey Street to facilitate construction traffic on lands to the rear of 1-35 Parkgate Gardens, the creation of a temporary footway adjacent to 88 Park Avenue and other ancillary development and landscaping restoration works.	14-Nov-23	11-Jun-24	Under Consideration
Page 29	LA04/2024/0910/F	Major	70 Whitewell Road, Newtownabbey, BT36 7ES Site at Hazelwood Integrated College	Redevelopment of Hazelwood Integrated College to include demolition of existing building and development of new school campus, new sports pitch, outdoor play areas, car parking, hard and soft landscaping and retention and refurbishment of the Listed Building (Graymount House) and other associated site works including a temporary mobile village during the construction process.	23-May-24	19-Dec-24	Under Consideration
4	LA04/2024/2024/RM	Major	Royal Ulster Agricultural Society, the Kings Hall, 488-516 Lisburn Road, Belfast, BT9 6GW	41no. retirement living apartments at Plot 6, parking and landscaping in accordance with outline planning permission LA04/2020/0845/O, seeking approval of layout, scale, appearance and landscaping details	18-Dec-24	16-Jul-25	Under Consideration
5	LA04/2025/0012/F	Major	Lands at the Waterworks Park, located off the Cavehill Road; approximately 20 metres to the west of 347 Antrim Road, Belfast, BT15 2HF	Reservoir safety works comprising a new overflow structure and reinforcement/protection of the return embankment alongside the by-wash channel at Waterworks Upper Reservoir; repairs to the upstream face of Waterworks Lower Reservoir; and wetland planting to reduce reservoir capacity. Wider Park improvement works comprising replacement of the existing Bothy with a new building incorporating public toilets, changing facilities, a community room and kitchenette; extension of the Cavehill Road Gatehouse; park entrance improvements; an improved plaza; new lighting; replacement platforms and viewing area; a new 3-on-3 basketball court; upgrades to Queen Mary's Playground; and associated ancillary works. (Revised Scheme)	20-Dec-24	18-Jul-25	Under Consideration

6	LA04/2024/2145/F	Major	Lands at North Foreshore / Giant's Park Dargan Road, Belfast, BT3 9LZ	Creation of a new Adventure Park comprising a community / visitor hub building including café, creche, flexible exhibition / community space, ancillary office space and maintenance yard. Development includes community gardens, bmx track, crazy golf, dog park, walking/running/cycle paths, outdoor amphitheatre, bio diversity zones, and recreational facilities. Associated landscaping and infrastructure (drainage, lighting, car / coach parking, WC block etc).	15-Jan-25	13-Aug-25	Under Consideration
7	LA04/2025/0184/O	Major	38-52 Lisburn Road, Malone Lower, Belfast, BT9 6AA	Seven storey building (39.3m AOD) mixed use development comprising of Use Class B1 (c): Business, Research & Development and Use Class, D1: Community and Cultural Uses, including landscaping, and servicing (Amended Description).	10-Feb-25	08-Sep-25	Under Consideration
8	LA04/2025/0088/F	Major	Lands adjacent and south west of Monagh By-pass, north west of Nos. 17, 19 and 22 Black Ridge Gardens and c.150 metres south east of Nos. 38 to 70 (evens) Black Ridge View (part of the wider Glenmona mixed-use development), Belfast	Proposed mixed use development (in lieu of the previously approved employment zone under LA04/2020/0804/F) comprising a three storey building of 36 no. Category 1 (over 55's) social housing apartments and 7 no. single storey Class B1/B2 Business/Light Industrial Units. Development includes 2 no. access points, car parking, landscaping and all associated site works	17-Feb-25	15-Sep-25	Under Consideration
9	LA04/2025/0974/F	Major	Site to the south of the former Knockbreda High School. Lands bounded by the A55 Upper Knockbreda Road to the south and south-east, Wynchurch Road to the north- east, Knockbreda Primary School to the north and Knockbreda Park to the west.	Development of a new primary school building for Forge Integrated Primary School. including development of a nursery unit, hard and soft play areas, landscaping, car parking, internal drop-off areas and new access arrangements onto the A55 Knockbreda Road via a new signalised junction; demolition of no. 138a Knockbreda Park and associated site works	04-Jun-25	31-Dec-25	Under Consideration
10	LA04/2025/2018/F	Major	Lands at Donegall Quay, Tomb St. to north of Albert Square, Gamble St. to south of Corporation Sq, Little Patrick St. to east of Nelson St. & under the M3 bridge at Donegall Quay and Corporation St., Belfast, BT1 1AA	Public realm and road improvements including development of urban recreation space below the M3 flyover at Corporation Street / Tomb Street and new public space below the M3 flyover at Donegall Quay.	19-Nov-25	17-Jun-26	Under Consideration
11	LA04/2026/0007/F	Major	Lands at Belfast YMCA, Knightsbridge Park, Stranmillis, Belfast. To the east of Nos. 15; 17; 19; 25; 27; 29; and 35 Knightsbridge Manor. South of Nos. 26 to 34 (evens) Knightsbridge Manor, Nos. 65; 66; and 68 Vauxhall Park, and Nos. 15 and 17 Marylebone Park. West of Nos. 35 and 38 Sharman Drive, and Nos. 39 and 42 Sharman Park, Belfast	Proposed mixed-use development comprising 3G playing pitch with floodlighting; Children's Play Area; Trim Trail; Car Parking; and 24 No. Dwelling Units including a mix of detached, semi-detached and apartment house types. The development also includes site access, internal roads, landscaping and pumping station and all other associated site and access works.	17-Dec-25	15-Jul-26	Under Consideration

12	LA04/2025/2210/O	Major	Lands to the east of Corporation Street, north of Donegall Quay, west and south of Clarendon Dock, south, east and south west of Pilot Street, and south and south east of Corry Road, Belfast (amended address)	Hybrid planning permission is being sought for the following development: Outline Planning Application (no matters reserved) for Plots A & B to provide 456No. residential units (apartments) and 1,600sqm of ground floor commercial uses including retail (Class A1), Financial and Professional (Class A2), Community and Cultural Uses (Class D1), Assembly and Leisure (Class D2), and café, bar and restaurant uses, landscaping, open space, play equipment, public realm improvements and all associated site and access works including servicing from Corporation Street. Outline Planning Application (all matters reserved) for Plots C, D, E and F for a mixed use development comprising residential (apartments and dwellings), a Hotel/Apart Hotel, ground floor commercial uses including retail (Class A1), Financial and Professional (Class A2), Community and Cultural Uses (Class D1), Assembly and Leisure (Class D2), and café, bar and restaurant uses, the change of use (principle only) to the listed Clarendon Building, Furnace House and Pump House (to include cafe and restaurant uses), re-purposing of Clarendon Dock for leisure uses and all associated site, access and infrastructure works.	27-Jan-26	25-Aug-26	Under Consideration
13	LA04/2026/0496/F	Major	Lands at 3-9 Dalton Street, (bordered by Middlepath Street and Bridge End), Belfast, BT5 4BA	Proposed construction of 325no. apartments, residents' gym and 4no. retail units with associated car parking and landscaping (amendment to previously approved application LA04/2018/2649/F).	19-Mar-26	15-Oct-26	Under Consideration
Page 31	LA04/2026/0515/F	Major	All Saints College Glen Road, Belfast and lands to the rear of Hamill Park and Nos 151 to 165A Glen Road (former Cross & Passion school site).	Proposed construction of a new post-primary school campus on the former Cross & Passion site, with associated landscaping, play areas, new access road, parking and all other associated works. The proposal also includes the demolition of the existing All Saints Glen Road Campus buildings and redevelopment of the site to include new playing fields, changing pavilion and associated parking.	20-Mar-26	16-Oct-26	Under Consideration
15	LA04/2025/2140/F	Major	Harberton North Special School 29a Fortwilliam Park, Belfast, BT15 4AP	Partial demolition of existing school buildings. Refurbishment of existing building and part single, part two storey extension to front and rear. New parking and drop off areas, play areas and landscaping.	28-Apr-26	24-Nov-26	Under Consideration
16	LA04/2026/0814/F	Major	Nos 128, 128C, 130, 132, 134, 136-138, & 140-144 Kingsway, Dunmurry, Belfast, BT17 9NP	Demolition of existing commercial units, erection of discount foodstore, alterations to car parking layout, alterations to access on Dunmurry Lane, landscaping and associated site works	01-May-26	27-Nov-26	Under Consideration
17	LA04/2026/0701/F	Major	Land adjacent to and south of the junction of London Road and Lismore Street, Belfast	Residential development of 24no. apartments in 8no. blocks, 44no. semi-detached houses and 1no. detached house (69no. units in total) and associated ancillary works	07-May-26	03-Dec-26	Under Consideration
18	LA04/2026/0909/F	Major	Centre House 69-87 Chichester Street, Belfast, BT1 4JE	Proposed change of use from offices to hotel at 1st to 7th floor and construction of a two-storey extension to the Chichester Street elevation to provide 176no. bedrooms, breakfast room/dining room, bar, kitchen, gym and business suite. Proposed partial change of use of ground floor from café to retail unit and ancillary space for hotel. Construction of additional plant room and elevational changes (amendment to previously approved application LA04/2022/2216/F).	05-Jun-26	01-Jan-27	Under Consideration

19	LA04/2026/0978/O	Major	Lands at former Sirocco Works, Short Strand and adjacent to Bridge End and River Lagan, Belfast	Renewal of outline planning permission LA04/2018/0811/O. Mixed use development comprising offices, residential apartments (including affordable), hotel and serviced apartments, retail and professional services, community and cultural, leisure uses, cafes, bars, restaurants, with associated car parking, circulation and servicing arrangements; public realm works, landscaping, replacement of existing pedestrian bridge fixed to railway bridge and associated access works to Short Strand and Bridge End with other infrastructural works, and demolition of existing structures including boundary walls.	24-Jun-26	20-Jan-27	Under Consideration
20	LA04/2026/1224/F	Major	City Link Business Park Albert Street, Belfast, BT12 4HQ	Erection of residential development comprising of 2 No. Apartment buildings comprised of 202 apartments, car parking, open space and all ancillary development and 1 No. social/affordable apartment building comprised of 51 apartments, car parking, open space and all ancillary development.	24-Jun-26	20-Jan-27	Under Consideration
21	LA04/2026/1226/F	Major	123 York Street, Belfast, BT15 1AB	Proposed use of 388 no. Student rooms as short term let accommodation outside of term time (July & August).	01-Jul-26	27-Jan-27	Under Consideration
22	LA04/2026/1262/F	Major	AMIC Harbour Building, 5 Airport Road, Belfast, BT3 9EF	Demolition of buildings to south-west of main building, erection of double height extension on south-west side facing Airport Road (18.08m height) with triple height extension (21.85m height) to rear on south-west side, erection of double height extension (12.07m height) on north-east side (total additional 6,754m ² floorspace Use Class (B1)(c)). PV panels, access from Airport Road, car parking, cycle parking, boundary fencing and all other associated works.	09-Jul-26	04-Feb-27	Under Consideration
23	LA04/2026/1250/F	Major	Lands on the site of the former Ballygolan Primary School, located adjacent / south of no. 45 Voltaire Gardens and 1 Serpentine Parade; and adjacent / west of no. 39 Vandyck Gardens and 39 Serpentine Road, Belfast	Residential development including 73 apartments (over 55s Category 1), communal spaces, mobility scooter storage areas, landscaped open space, car parking, bin stores and associated site works	23-Jul-26	18-Feb-27	Under Consideration
24	LA04/2026/1529/F	Major	Lands at Alexandra Park, located between Castleton Gardens and Deacon Street, approximately 20 metres to the south of 237 Alexandra Park Avenue, Belfast, BT15 3BG	Reservoir safety works comprising a new weir, culvert and spillway channel; removal of the existing parapet wall; reinforcement and regrading of the downstream embankment; and two replacement footbridges. Wider Park improvement works comprising play park upgrades; new lighting; new reinforced grass event space; new public toilets and changing places building; entrance improvements; a reimagined peace wall; a new sheltered multi-sport synthetic surface; and associated ancillary works	21-Aug-26	19-Mar-27	Under Consideration
25	LA04/2026/1487/F	Major	Lanyon View 24 East Bridge Street, Belfast, BT1 3PH	Proposed change of use from offices to provide 53 no. room aparthotel, to include external alterations, roof mounted solar PV, plant & machinery and all other associated site works	21-Aug-26	19-Mar-27	Under Consideration

Planning

Decision Description	Totals												
	27												
Application Withdrawn													
Consent Granted	2												
Consent Refused													
Permission Granted	1												
Permission Refused													
Total	30												
Application No.	Location	Proposal	Category	Date Valid	Statutory Target Date	Statutory Target Weeks	Current number of Weeks	Committee Date	Weeks between Valid date and Comm date	Weeks Since Committee	Previous New Non-statutory Target Date	New Non-statutory Target Date	Reason decision not issued
LA04/2022/2059/F	Lands south of 56 Highcairn Drive Belfast BT13 3RU Site located at junction between Highcairn Drive and Dunboyne Park Belfast.	Social Housing Development comprising of 12 no. 3p/2b semi-detached dwelling houses with incurtilage parking and associated site works. (amended description and site location plan)	LOC	04-Nov-22	17-Feb-23	15	201	29/06/2023	33	166	Unknown	Unknown	Awaiting Section 76 Agreement - waiting on Certificate of Title from NIHE
LA04/2020/0568/F	21 Queen Street Belfast BT1 6EA.	Demolition of building and structures at rear, refurbishment and alteration of frontage building and erection of 9 storey extension to rear to form hotel (74 bedrooms) with associated restaurant, bar & ancillary facilities and works (amended description).	LOC	04-Mar-20	17-Jun-20	15	340	10/12/2024	248	91	N/A	Unknown	Approval decision quashed following JR challenge. Planning Service to meet applicant to discuss next steps
LA04/2020/0569/LBC	21 Queen Street Belfast.	Demolition of building and structures at rear, part demolition to internal features, refurbishment and extension to listed building (amended description).	LOC	17-Feb-20	01-Jun-20	15	342	10/12/2024	251	91	N/A	Unknown	Approval decision quashed following JR challenge. Planning Service to meet applicant to discuss next steps

LA04/2024/1036/F	Lands to the east of the River Lagan located between Lagan Gateway Phase 1 and Belvoir Park Forest, running adjacent to the west of Belvoir Park Golf Club and approximately 120 metres to the east of Newtownbreda Water Treatment Plant, Galwally Ave, Belfast BT8 7YA.	Lagan Gateway Phase 2 – Proposed greenway connection extending between Lagan Gateway Phase 1 at Annadale Embankment to Belvoir Forest Park. Comprising compacted gravel paths; a new elevated (4-5 meter high) timber boardwalk (approximately 85m long); landscaping works, new cycle stands, bollards, seats and bins; and all associated works	LOC	10-May-24	23-Aug-24	15	122	17/06/2025	57	64	Unknown	Unknown	Further information received from applicant following request from DAERA NIEA and NIEA reconsulted
LA04/2025/0535/F	Lands West of Monagh By-Pass South of Upper Springfield Road & 30-34 Upper Springfield Road & West of Aitnamona Crescent & St Theresa's Primary School. North and East of 2-22 Old Brewery Lane, Glanaulin, 137-143a Glen Road & Airfield Heights & St Mary's CBG School Belfast	Variation of conditions 1, 2, ,3, 4 ,5, 11, 14, 17, 18, 19, 36, 37 and 41 of approval LA04/2023/2390/F and LA04/2020/0804/F to facilitate removal of 31 previously approved dwellings and retaining structure along northern boundary of site adjacent to Upper Springfield Road. Retention of existing sloping ground levels and landscaping at this location.	MAJ	27-May-25	23-Dec-25	30	67	17/06/2025	3	64	30/09/2026	31/10/2026	Awaiting conclusion of S77 agreement (amendment to S76 agreement). DfI Roads issues now resolved
LA04/2024/1865/O	Land between No 22 Squires View and Nos 57 & 59 Squires Hill Road, Belfast.	3no. detached dwellings part 2 storey part 3 storey (amended plans)	LOC	28-Oct-24	10-Feb-25	15	97	12/08/2025	41	56	30/09/2026	31/10/2026	Late objections received. Additional information received from applicant regarding land stability issue. New objection from Shared Environmental Services being considered. To be reported back to Committee

LA04/2025/0605/F	341-345 Albertbridge Road, Ballymacarret, Belfast, BT5 4PY	Erection of a four storey building to create 29no. short-term let accommodation units with ancillary roof-mounted solar panels	LOC	09-Apr-25	23-Jul-25	15	74	17/02/2026	44	29	N/A	N/A	Application considered at February 2026 Committee following site visit
LA04/2025/0463/F	Decco Ltd 1-5 Redcar Street, Belfast, BT6 9BP	Proposed change of use of Vacant Warehouse to indoor Padel Court Facility to include, Cafe, Changing rooms, Gym, Picklecourts and ancillary site development works	LOC	26-Mar-25	09-Jul-25	15	76	10/03/2026	49	26	Unknown	Unknown	Delegated authority sought to resolve final response from NIW. Discussions ongoing
LA04/2025/1002/F	24 Rutherglen Street, Belfast, BT13 3LS	Change of use from 4 bed residential dwelling (C1) to 5 bedroom HMO (suis generis) with occupancy for 5 people	LOC	17-Jul-25	30-Oct-25	15	60	10/03/2026	33	26	N/A	Unknown	Deferred for Site Visit. Consulted NI Water who have requested a Waste Water Impact Assessment
LA04/2025/0574/F	Surface level car park at lands to east of Lanyon Place Station Mays Meadow, Belfast, BT1 3NR	Erection of eight storey building comprising seven floors of grade A office accommodation, ground floor retail / business units together with car parking (15 no. spaces), cycle parking and plant areas: and public realm improvements including dedicated drop-off area to front of building	MAJ	17-Apr-25	13-Nov-25	30	73	10/03/2026	46	26	30/09/2026	30/09/2026	Planning Service discussed disabled parking requirements with DfI Roads
LA04/2025/0594/F	163 Ballygomartin Road, Belfast, BT13 3NA	Change of use from 4 bedroom residential property (C1) with to 5 bed HMO with occupancy of 5 (Sui Generis)	LOC	30-Apr-25	13-Aug-25	15	71	10/03/2026	44	26	N/A	Unknown	Deferred for Site Visit. Consulted NI Water who have requested a Waste Water Impact Assessment
LA04/2025/1350/F	29 GLENCAIRN STREET EDENDERRY BELFAST BT13 3LT	Change of Use from 3 bed Dwelling (Class C1) to 5-bed, 5-person HMO (sui generis)	LOC	24-Jul-25	06-Nov-25	15	59	21/04/2026	38	20	31/08/2026	30/09/2026	Drafting refusal reasons

LA04/2025/1991/F	Makro, 97 Kingsway, Belfast, BT17 9NS	Subdivision of the existing cash and carry building and the change of use of 4,750 sq,m gross floorspace for use as a Class A1 retail; erection of new loading bay in service yard; minor external alterations to building; reconfiguration of car park.	MAJ	03-Dec-25	01-Jul-26	30	40	06/06/2026	26	13	30/09/2026	Unknown	Awaiting consultation response from DfI Roads. Applicant preparing WWIA following advice from NI Water / SES
LA04/2025/2013/F	Netherleigh House, 1 Massey Avenue, Belfast, BT4 2JP	Change of use of Netherleigh House and existing office blocks (Class B1) to provide residential and nursing care facilities (Class C3 (a) and (b)). Extensions to existing office block including a fourth storey floor, eastern and western gable extension and two front projections from the northern elevation. Erection of 36 no. assisted living apartments over two four storey blocks. Site parking, landscaped amenity areas, woodland trails and all associated site works	MAJ	18-Nov-25	16-Jun-26	30	42	16/06/2026	30	12	30/09/2026	Unknown	Further information required by DAERA NIEA. Awaiting consultation response from SES

LA04/2025/2015/LBC	Netherleigh House, 1 Massey Avenue, Belfast, BT4 2JP	Change of use of Netherleigh House and existing office blocks (Class B1) to provide residential and nursing care facilities (Class C3 (a) and (b)). Extensions to existing office block including a fourth storey floor, eastern and western gable extension and two front projections from the northern elevation. Erection of 36 no. assisted living apartments over two four storey blocks. Site parking, landscaped amenity areas, woodland trails and all associated site works	LOC	18-Nov-25	03-Mar-26	15	42	16/06/2026	30	12	30/09/2026	Unknown	Further information required by DAERA NIEA. Awaiting consultation response from SES
Page 37 LA04/2025/1839/F	Lindsay House, 8 - 14 Callender Street, Belfast, BT1 5BN	Change of use from fast food unit, restaurant, retail and office to hotel with associated restaurant/bar areas, lobby/reception area and other areas ancillary to hotel use at ground floor level, 76no. bedrooms on 1st to 4th floor level and ancillary rooftop store. Includes demolition of all internal walls and partitions at ground floor level and demolition of sections of building at the rear, replacement of windows, reconfiguration and replacement of shopfronts, creation of new openings for windows and removal of rooflights.	LOC	31-Oct-25	13-Feb-26	15	45	16/06/2026	32	12	Unknown	Unknown	Awaiting consultation response from NI Water. SES requires satisfactory Waste Water Impact Assessment to be submitted to NI Water

LA04/2025/1841/DCA	Lindsay House 8 - 14 Callender Street, Belfast, BT1 5BN	Change of use from fast food unit, restaurant, retail and office to hotel with associated restaurant/bar areas, lobby/reception area and other areas ancillary to hotel use at ground floor level, 76no. bedrooms on 1st to 4th floor level and ancillary rooftop store. Includes demolition of all internal walls and partitions at ground floor level and demolition of sections of building at the rear, replacement of windows, reconfiguration and replacement of shopfronts, creation of new openings for windows and removal of rooflights.	LOC	31-Oct-25	13-Feb-26	15	45	16/06/2026	32	12	Unknown	Unknown	Awaiting consultation response from NI Water. SES requires satisfactory Waste Water Impact Assessment to be submitted to NI Water
LA04/2026/0340/F	The Edge, 1 Frederick Street, Belfast, BT1 2LW (formally 48-52 York Street, Belfast, BT15 1AS)	Proposed change of use of 144 no. PBMSA units to short term let accommodation outside of term time only.	LOC	30-Mar-26	13-Jul-26	15	23	16/06/2026	11	12	31/08/2026	31/10/2026	Awaiting finalisation of s76 planning agreement

LA04/2026/0021/F	Former Good Shepherd Centre at lands at Nos. 511 and 511a Ormeau Road Belfast BT7 3GS	Conversion of former convent to 28no. apartments (1, 2 & 3 bed) involving internal and external refurbishment/retention and re-configuration. Provision of ground floor extension with partial demolition and provision of new stairwell and lift. Provision of dormers, rooflights and extension to first, second floor and attic levels regarding new stairwell and lift. External layout reconfigurations to include construction of new access from Ormeau Road, amended parking layout, provision of cycle parking, bin stores, landscaping, substation and associated works.	LOC	22-Jan-26	07-May-26	15	33	16/06/2026	20	12			Permission Granted
LA04/2026/0022/LBC	Former Good Shepherd Centre at lands at Nos. 511 and 511a Ormeau Road Belfast BT7 3GS	Conversion of former convent to 28no. apartments (1, 2 & 3 bed) involving internal and external refurbishment/retention and re-configuration. Provision of ground floor extension with partial demolition and provision of new stairwell and lift. Provision of dormers, rooflights and extension to first, second floor and attic levels regarding new stairwell and lift. External layout reconfigurations to include construction of new access from Ormeau Road, amended parking layout, provision of cycle parking, bin stores, landscaping, substation and associated works.	LOC	05-Jan-26	20-Apr-26	15	35	16/06/2026	23	12			Consent Granted

LA04/2024/1195/F	Lands south of nos. 7-14 Wolfhill Manor, east of no.42 Mill Avenue and west and north west of 100 Mill Avenue, Ligoniel, Belfast, BT14 8EL.	Proposed residential development comprising 20 no. dwelling units, including 8 no. semi-detached 2 storey dwellings, 1 no. detached 2 storey dwelling, 2 no. 3-bed apartments (2 storey building) and 9 no. 2-bed apartments (3 storey building) with associated car parking, landscaping and associated works.	LOC	04-Jul-24	17-Oct-24	15	114	16/06/2026	101	12	31/08/2026	31/10/2026	Awaiting Section 76 Agreement
LA04/2025/1651/F	20 Rosemary Street, Belfast, BT1 1QD	Retention, conversion, refurbishment and change of use of existing office building (Class A2) and 2 no. vacant retails units (Class A1) to hotel accommodation and associated facilities, including bar and restaurant (sui generis) and extension of 5th floor (30no. hotel bedrooms in total)	LOC	30-Sep-25	13-Jan-26	15	49	16/06/2026	37	12	30/09/2026	Unknown	NI Water advises that Waste Water Impact Assessment is unsatisfactory. SES requires satisfactory WWIA
LA04/2024/0570/F	Stormont Hotel, 587 Upper Newtownards Road, Belfast BT4 3LP	Change of use of an existing hotel, conference centre and offices (sui generis) to a 97-bed care home (Use Class C3(b)) and 1,559sqm diagnostic medical facility (Use Class D1(a)), associated access, car parking, landscaping and open space.	MAJ	04-Apr-24	31-Oct-24	30	127	16/06/2026	114	12	N/A	N/A	Application considered at June 2026 Committee

LA04/2024/0569/O	Stormont Hotel, 587 Upper Newtownards Road BT4 3LP and adjacent properties at Castlevue Road (nos. 2, 4, 6, 16, 18, 20, 22, 24, 26, 28 & 30), Summerhill Parade (nos. 18, 20 & 22), and rear of 160 Barnetts Road, Belfast (amended address)	Outline planning permission with all matter reserved for independent living (Use Class C1) units and up to 62no. assisted living units (Use Class C3), associated internal access roads, communal open space, revised access from Castlevue Road, associated car parking, servicing, amenity space and landscaping and demolition of dwellings at Castlevue Road (nos. 2, 4, 6, 16, 18, 20, 22, 24, 26, 28 & 30) and Summerhill Parade (nos. 18, 20 & 22) (amended description).	MAJ	04-Apr-24	31-Oct-24	30	127	16/06/2026	114	12	N/A	N/A	Application considered at June 2026 Committee
Page 11 LA04/2022/0809/F	Lands to the south and west of Woodland Grange to the north of Blacks Gate and to the east of Moor Park Mews Belfast.	Amendments to approved schemes ref. Z/2008/0993/F (erection of 53 No. dwellings) & ref. Z/2013/0120/F (erection of 46 No. dwellings); to reduce overall density from 99 No. dwellings to 92 No. dwellings and associated and ancillary works.	MAJ	21-Apr-22	17-Nov-22	30	229	16/06/2026	216	12	N/A	Unknown	Awaiting resolution of cycle-foopath design issues raised by DfI Roads. Completion of s76 planning agreement
LA04/2024/2134/F	Site of the former Dunmurry Cricket Club, Ashley Park, Dunmurry, Belfast BT17 0QQ, located north of 1-10 Ashley Park and south of 1-20 Areema Grove and Areema Drive, Dunmurry.	Mixed use scheme for new community recreational facilities, including basketball court, parkland and residential development comprising 37no social/affordable housing units with landscaping and associated works.	MAJ	21-Dec-24	19-Jul-25	30	90	18/08/2026	86	3	N/A	Unknown	Deferred for outstanding consultation responses from DAERA NIEA, SES and NI Water

LA04/2025/0110/F	Hammer Playing Pitch Agnes Street, Shankill Road, Belfast, BT13	Resurfacing and minor extension of existing 3G pitch; replacement floodlighting; 50 seater covered mini-stand (3.8m tall by 7.5m long and 3.3m wide); additional 1.2m fencing enclosure to pitch; replacement dugouts: storage container (3.6m by 2.4m); removal of portacabin and associated minor works/drainage modifications.	LOC	28-Feb-25	13-Jun-25	15	80	18/08/2026	76	3	N/A	31/10/2026	HRA being finalised
LA04/2026/0282/F	29-33 Bedford Street, Belfast, BT2 7EJ	Renewal of application reference LA04/2020/0659/F - Refurbishment of existing four storey terrace including alteration, extension to rear, partial demolition and reinstatement. Part change of use from art galleries to two cafes at ground floor. Retention of offices within existing building at second, third and fourth floor. Erection of new 13 storey aparthotel building to rear and associated works including public realm improvements	MAJ	13-Feb-26	11-Sep-26	30	30	18/08/2026	26	3	N/A	11/09/2026	Decision notice ready to issue
LA04/2026/0928/LBC	Bank Of Ireland Buildings, 92-100 Royal Avenue, Belfast, BT1 1DL	Building fabric investigation works prior to restoration	LOC	20-May-26	02-Sep-26	15	16	18/08/2026	12	3			Consent Granted

LA04/2026/0442/F	Land at D3 adjacent to the RSPB Reserve Airport Road West, Belfast, BT3 9DY	Revisions to terrestrial elements of Planning Permission ref. LA04/2016/0421/F (Construction of a new multi-purpose berthing facility at D3) comprising upgrade of existing access track along northeastern boundary of site and installation of associated street lighting/parking area; additional security hut; relocation and extension of main cruise terminal building and associated parking/drop-off areas with covered walkways; additional baggage building; and other associated site works in respect of lighting, landscaping and ancillary infrastructure. Retention of approved cruise quay with minor relocation of mooring dolphins, 25m wide piled relieving slab along quay length, associated hardstanding on hinterland.	MAJ	24-Mar-26	20-Oct-26	30	24	18/08/2026	21	3	N/A	Unknown	Awaiting outstanding consultation responses from DAERA NIEA and SES
------------------	---	---	-----	-----------	-----------	----	----	------------	----	---	-----	---------	---

This page is intentionally left blank



Belfast
City Council

PLANNING COMMITTEE

Subject:	Consultation on a Historic Environment Policy for Northern Ireland
Date:	15 September 2026
Reporting Officer:	Dermot O'Kane – Acting Development Planning & Policy Manager
Contact Officer:	Robert Kennedy, Senior Planning Officer

Is this report restricted?	Yes	☐	No	☒
Is the decision eligible for Call-in?	Yes	☒	No	☐

1.0	Purpose of Report or Summary of Main Issues
1.1	The purpose of this report is to seek the Planning Committee's approval of Belfast City Council's response to the Department for Communities' consultation on the Draft Historic Environment Policy 2027-2037.
1.2	The consultation proposes a strategic policy framework intended to guide the identification, protection, management and promotion of Northern Ireland's historic environment over this period.
2.0	Recommendations
	The Planning Committee is requested to: • Note the contents of the Department's consultation document; • Agree the proposed Council response as outlined within this report; and • Authorise officers to submit the response to the Department for Communities.
3.0	Background
3.1	The Department for Communities has published a Consultation on a Historic Environment Policy for Northern Ireland Department for Communities . The document forms part of the Heritage, Culture and Creativity Programme and sets out a series of high-level policy aims relating to the conservation, protection, management and promotion of Northern Ireland's historic environment. The Department has also published its Strategic Environmental Assessment (SEA), Equality Impact Screening and Rural Needs Impact Assessment documents as part of this consultation.
3.2	The consultation document identifies 17 draft policy aims and establishes a strategic direction for future heritage policy. However, it contains limited detail regarding implementation mechanisms, governance arrangements, funding structures and the relationship with existing planning policy and guidance.
3.3	Given the Council's statutory planning responsibilities, including preparation of the Local Development Plan (LDP) and the assessment of planning applications affecting the

	historic environment, clarification is required regarding the practical implications of the proposed policy framework.
4.0	Main Issues
4.1	The consultation document is largely strategic and aspirational in nature and does not clearly explain how the proposed policy aims will be delivered, monitored or resourced. Clarification is sought regarding the status of the document and its relationship with future policies, guidance, action plans and implementation frameworks.
4.2	Particular concerns relate to the interaction between the proposed policy and the existing planning system. It is unclear how the policy will relate to Local Development Plans, Community Planning, existing departmental planning guidance, and current heritage designation processes. Further clarity is requested regarding the implications for local authorities, including any new responsibilities arising from the policy.
4.3	The response also highlights uncertainty regarding funding arrangements and delivery mechanisms. While the document refers to future investment in heritage-led regeneration, housing delivery, town centre renewal and heritage assets at risk, no detail is provided on funding criteria, governance arrangements, prioritisation processes, or resource commitments.
4.4	Concerns are raised regarding several draft policy aims which identify desired outcomes but do not explain the practical actions, programmes or interventions that would be required to achieve them. This includes objectives relating to place-making, education, accessibility, technology and community engagement.
4.5	The response notes that references to international heritage conventions and guidance require further explanation, particularly in relation to how these principles will be interpreted and applied alongside existing planning and heritage policy frameworks.
4.6	The consultation document's ambitions to improve access to heritage information and promote wider participation are supported. However, greater detail is sought regarding the proposed use of technology, digitisation, online access to heritage records, and other measures intended to improve accessibility and public engagement.
4.7	Overall, it is considered that the document would benefit from additional detail on implementation arrangements, governance structures, funding mechanisms, monitoring and performance measures, and its relationship with existing planning policy. It is also suggested that a more open-ended consultation format would have enabled more comprehensive consideration of these issues by stakeholders.
	<u>Finance and Resource Implications</u> There are no resource implications associated with this report. <u>Asset and Other Implications</u> None noted. <u>Equality or Good Relations Implications</u> There are no relevant equality or good relations implications attached to this report.
5.0	Appendices

	Appendix 1 – Historic Environment for Northern Ireland - Background to Public Consultation Appendix 2 – Strategic Environmental Assessment (SEA) Report for Historic Environment Policy for Northern Ireland Appendix 3 – Draft Council Response
--	--

This page is intentionally left blank



Department for
Communities
www.communities-ni.gov.uk



Historic Environment Policy – Public Consultation

Background to Public Consultation



© Crown Copyright 2025

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence visit:

www.nationalarchives.gov.uk/doc/open-government-licence/version/3/

or email: psi@nationalarchives.gsi.gov.uk

Where we have identified any third-party copyright information you will need to obtain permission from the copyright-holders concerned.

Any enquiries regarding this document should be sent to us at:

DfC Culture Division

7th Floor

Causeway Exchange

1-7 Bedford Street

Belfast

BT2 7EG

Email: hccpublicconsultation@communities-ni.gov.uk

This publication is also available to download from our website at www.communities-ni.gov.uk

HISTORIC ENVIRONMENT POLICY: PUBLIC CONSULTATION

OVERVIEW

The Department for Communities (DfC) is the Executive department with responsibility for policy on the historic environment in Northern Ireland.

The **historic environment includes all aspects of the environment resulting from the interaction between people and places through time**, including all surviving physical remains of past human activity, whether visible, buried or submerged, and deliberately planted or managed flora. It is a key contributor to our sense of place, identity, and distinctiveness.

The focus of this consultation is on our **draft vision statement**, and on our proposed **17 policy aims** which will be the basis of a new policy for the support and management of our historic environment.

The intended period covered by this Historic Environment Policy is **10 years** from date of publication (proposed 2027 – 2037), with a **mid-point review**. However, any impacts associated with the proposed Policy may take effect over a period of many decades. For this reason, a longer-term view has been taken on potential impacts.

The **geographical area covered by** the Historic Environment Policy takes in the **whole of Northern Ireland**, including inshore and offshore marine regions. The Policy however also considers existing and

potential transboundary partnerships with the remainder of the UK, the Republic of Ireland and relevant international partners.

The Policy vision and aims have been prepared after extensive **engagement**.

The work to develop this policy forms part of the Heritage, Culture and Creativity (HCC) Programme which is also developing policies for museums, public libraries and the arts. The HCC was established by the Minister for Communities in July 2024 and seeks to ‘address actions to conserve, protect and promote our cultural heritage and historic environment; and to encourage, support and develop the curiosity, active engagement and creativity it helps to inspire’.¹

The programme followed the Culture Arts and Heritage Taskforce’s ‘A Way Forward’, ‘Art of Recovery’ and ‘Investing in Creative Delivery’² reports, and the department has used the work of the Taskforce as a key basis for its policy development. The sector told us to **Strengthen, Connect, and Innovate** to sustain our culture arts and heritage into the future.

Your views about the future management of the historic environment through the **Historic Environment Policy are important to us** and will **inform the new policy**. A questionnaire on the draft vision and the policy aims is available at the link below and we would welcome your response by **23rd October 2026**.

¹ See Heritage, Culture and Creativity (HCC) Programme | Department for Communities

² Culture, Arts and Heritage: A Way Forward | Department for Communities; The Art of Recovery Survive: Stabilise: Strengthen | Department for Communities; Investing in Creative Delivery – A report from the Culture, Arts & Heritage Strategy Taskforce | Department for Communities

ABOUT THE CONSULTATION PROCESS

Following on from the work of the Culture, Arts and Heritage Taskforce, the department has carried out extensive engagement.

HED's Listed Building and Historic Monument **Owners'** surveys³ told us about the conservation deficit, the need to invest in skills, access to advice, expertise and information.

We met with each of the 11 **District Councils and all central Government Departments**. We found potential partnerships, connections, shared aims and new ideas which could connect and amplify the actions across a joined-up HCC Programme and within an Historic Environment Policy which is linked to the Programme for Government – a policy which supports People, Places, the Planet and Peace.

We met within our own department and we sought the views of the **Historic Environment Stakeholder Group⁴, The Heritage Skills Core Group,⁵ The Historic Buildings Council and the Historic Monuments Council**, who asked us for better partnerships and for people and place to be uppermost. We looked at how we could jointly meet the Department for Communities' common purpose: '**Supporting people, Building communities, Shaping places**'.

We carried out **Rural Impact, Equality and Strategic Environmental Assessment**

Screening – to make sure that the policy is inclusive, improving the lives of people and our environment.

The results of our engagement have shaped the policy, telling us about the 'ecosystem' needed to sustain our historic environment and to maximise the impact it can make on Northern Ireland.

This public consultation is an opportunity to **have your say**.

If you are responding on behalf of an organisation, we would ask that only one person from each organisation submits a response. A paper-based questionnaire is available on request from **HCCpublicconsultation@communities-ni.gov.uk**

For this consultation, we may publish all responses except for those where the respondent indicates that they do not wish for their responses to be published. All responses from organisations and individuals responding in a professional capacity may be published. We will remove any personal data, including email addresses and telephone numbers, from these responses; but apart from this, we may publish them in full. For more information about what we do with personal data please see our **consultation privacy notice**.

³ Market failure in heritage | Department for Communities

⁴ The Northern Ireland Historic Environment Stakeholder group consists of an alliance of representatives from key stakeholder organisations including heritage NGO's, universities, district councils, and government agencies. It is convened by the Historic Environment Division of the Department for Communities.

⁵ The Heritage Skills Core Group is a body set up by DfC and others interested in tackling the issue of heritage skills.

Your response, and all other responses to this consultation, may also be disclosed on request in accordance with the Freedom of Information Act 2000 (FOIA) and the Environmental Information Regulations 2004 (EIR); however, all disclosures will be in line with the requirements of the Data Protection Act 2018 (DPA) and the General Data Protection Regulation (GDPR) (UK) 2016/679.

If you want the information that you provide to be treated as confidential it would be helpful if you could explain to us why you regard the information you have provided as confidential, so that this may be considered if the Department should receive a request for the information under the FOIA or EIR.

In order to facilitate the survey, Citizen Space, which is not operated by the Department, is used as a data processor. Details of Citizen Space's privacy policy can be found online at **Citizen Space Privacy Policy**.

MINISTERIAL FOREWORD



In July 2024 as part of the Heritage, Culture and Creativity Programme, I made a commitment to deliver the first policy for the historic environment in Northern Ireland. The consultation being launched today marks an important step in that process.

The draft policy presents us with an opportunity to appreciate and maximise the positive contribution that this part of our environment makes to each of us, to our communities and to our wellbeing. We have an asset that is found in every corner of Northern Ireland, a product of a rich and complex history that has made our landscape, villages, towns and cities unique and special. Our historic environment belongs to all of us.

My department aims to support communities at all levels. We want to ensure that the historic environment, which is at the heart of every local community, is part of decision making and is used, cared for and adapted sustainably. I recognise that a framework of support will be needed, with priorities for funding identified across this policy, so that it can contribute to a promising future – one where heritage assets, places and activities continue to have positive impacts for the people they connect.

This policy has been developed in partnership with all our stakeholders. Their honest and informed participation emphasised not only what the historic environment means to people, but that there is a real need to improve the way we are managing this resource.

This is your chance to contribute your views on how our historic environment should be identified, protected, managed and celebrated to maximise the contribution it makes to how we live, now and in the future.

Thank you for taking the time to participate in this consultation.

Gordon Lyons MLA,
Minister for Communities

HISTORIC ENVIRONMENT POLICY: CONSULTATION

Introduction and Context

1. Our historic environment includes all aspects of the environment resulting from the interaction between people and place over time. This includes all surviving physical remains of past human activity, whether visible, buried or submerged, and deliberately planted or managed flora.
2. The Department for Communities and District Planning Authorities record the ‘heritage assets’ that make up our historic environment in a range of ways. DfC designates the best of these for protection as either Scheduled Historic Monuments or Listed Buildings. District Planning Authorities bring controls to area designations such as Conservation Areas and Areas of Townscape/ Village Character.

As of March 2024, we have recorded tens of thousands of heritage assets in Northern Ireland. These can be listed as follows:

- 1 Transboundary Cultural World Heritage Site
- 18,222 Sites and Monuments
- 2,053 Scheduled Historic Monuments
- 187 Monuments in State care
- 16,321 Historic buildings worthy of recording
- 9,124 Listed Buildings
- 16,648 sites on the Industrial Heritage Record
- (24% protected by formal designation)
- 663 Historic Parks or Gardens (HPGs)
- 4,592 Defence Heritage Sites
- 324 battle sites
- 60 conservation areas
- 205 Areas of Townscape Character (ATC)s
- 130 Local Landscape Policy Areas (LCAs)
- 11 Areas of Significant Archaeological Interest
- 403 Historic Nucleated Settlements
- 832 Maritime Heritage Sites (inc in SMR)
- 384 known wreck sites
- 4 protected wrecks

3. Cultural traditions, folklore, festivals, oral traditions and storytelling play a part in our experience of the historic environment, but this policy focuses predominantly on physical assets.
4. There has never been an historic environment policy in Northern Ireland.
5. During the development of this policy we have engaged with a wide range of stakeholders including the Culture Arts and Heritage Taskforce, district councils, government departments and the heritage sector. We have also carried out surveys of owners to understand their views in detail.
6. As a result, we have developed 17 aims which we are proposing should form the basis of the Historic Environment Policy. We want your views on these proposals.
7. Although the Department for Communities is leading the implementation of the Policy, the consultation describes actions that any organisation and even individuals can take to effect meaningful change. We will rely on multiple organisations and partners to achieve our ambition. For example:
 - We propose that Charities, volunteers and heritage organisations, networks or individuals should be supported by high-level activity like the provision of funding or advice and guidance;
 - We intend that District Councils will use this Policy to direct Local Development and Community Planning for place-making, heritage plans, environmental plans and tourism, and to consider how to use the historic environment to achieve social cohesion and good relations;
 - We have also identified significant ways that the Northern Ireland Executive and government can deliver more through the historic environment.

CONTEXT

The Heritage, Culture and Creativity Programme

8. The work to develop Historic Environment policy forms part of the Heritage, Culture and Creativity (HCC) Programme. HCC was established by the Minister for Communities in July 2024. It will see the development of new policies for the arts, historic environment, public libraries and museums and will give each of the policy areas the status they merit, providing each of the communities of interest with their own focus. More information about HCC can be found at **Heritage, Culture and Creativity Programme**.

Guiding Principles for Policy Development

9. The Heritage, Culture and Creativity (HCC) Programme is built on a shared set of guiding principles . They are that the Heritage, Culture & Creativity Programme policies will:
- be **valued** by all
 - be **inclusive**, recognising and respecting the diversity of our society
 - bring **equitable** access to opportunities and experience
 - **enhance** the lives of people and communities
 - be economically sustainable

10. As part of the HCC Programme, the Historic Environment Policy will contribute to a greater whole – that of the shared impact that our Heritage, Culture and Creativity can make to people and places.

Challenges

11. The historic environment in Northern Ireland is in decline. We know this because surveys to monitor the condition of listed buildings⁶ and monuments⁷ have given us this data. A further survey of listed building and scheduled monument owners⁸ identified specific problems and opportunities for people who own heritage assets.
12. In the Listed Buildings and Monument Owners Surveys, people told us:
- With the economic downturn there is less money to invest
 - It takes too long to get permissions
 - Condition is getting worse
 - Heritage at Risk has doubled
 - There is a lack of digital access to information, guidance and resources
 - There is a lack of evidence and visibility of the sector
 - There is a lack of skilled people
 - There is a lack of measurable metrics for the benefits of heritage
 - It's hard to get the right advice

⁶ Survey on the Condition of Listed Buildings | Department for Communities

⁷ Survey of the condition of scheduled historic monuments (internal DfC research based upon monitoring, 2024)

⁸ Market failure in heritage | Department for Communities

- The non-monetary benefits of heritage are poorly understood
- There is a lack of funding for heritage
- Heritage projects are seen as too difficult
- Heritage is seen as elitist
- Heritage is seen as not adaptable
- Heritage is seen as too expensive
- There is a misunderstanding of regulation versus protection

13. While all of the historic environment is vulnerable to climate change, many historic monuments occupy exposed or rural settings and are particularly vulnerable to climate-related pressures such as more frequent storms, high winds and intense rainfall, which accelerate decay in high-level masonry and

destabilise earthworks. Without targeted intervention, losses that have survived famine, war and industrial change risk becoming irreversible within a generation.

14. As shown in Figure 1, below, in the 2024 Listed Building Condition Survey the overall condition of the majority of buildings was rated as Very good/Good or Average (61.3%). However this appears to be a 24.4 percentage point worsening in 20 years when compared to the 2004/05 figure. The rate of decline is accelerating there was an 8.8 percentage point reduction between 2004/05 and 2014/15, a 15.6 percentage point reduction over a similar ten year period between 2014/15 and 2024 (note there are differences in survey methodology between the 2002-2005 survey and subsequent surveys).

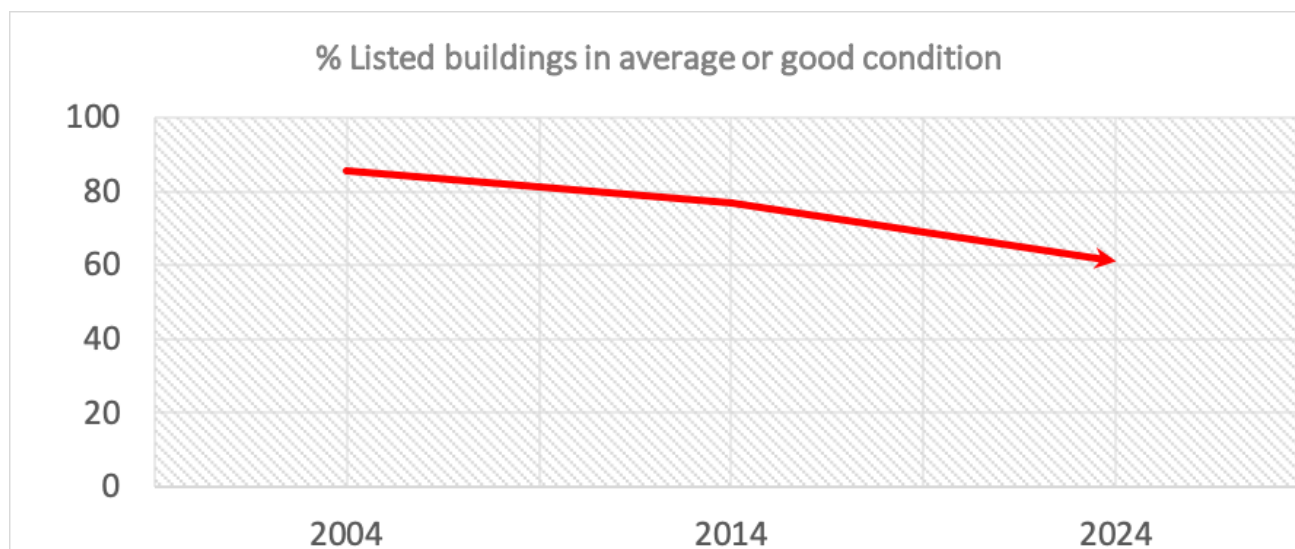


Figure 1 - showing a downward trend in condition of listed buildings over a twenty year period; Note there are differences in survey methodology between the 2002-2005 survey and subsequent surveys.

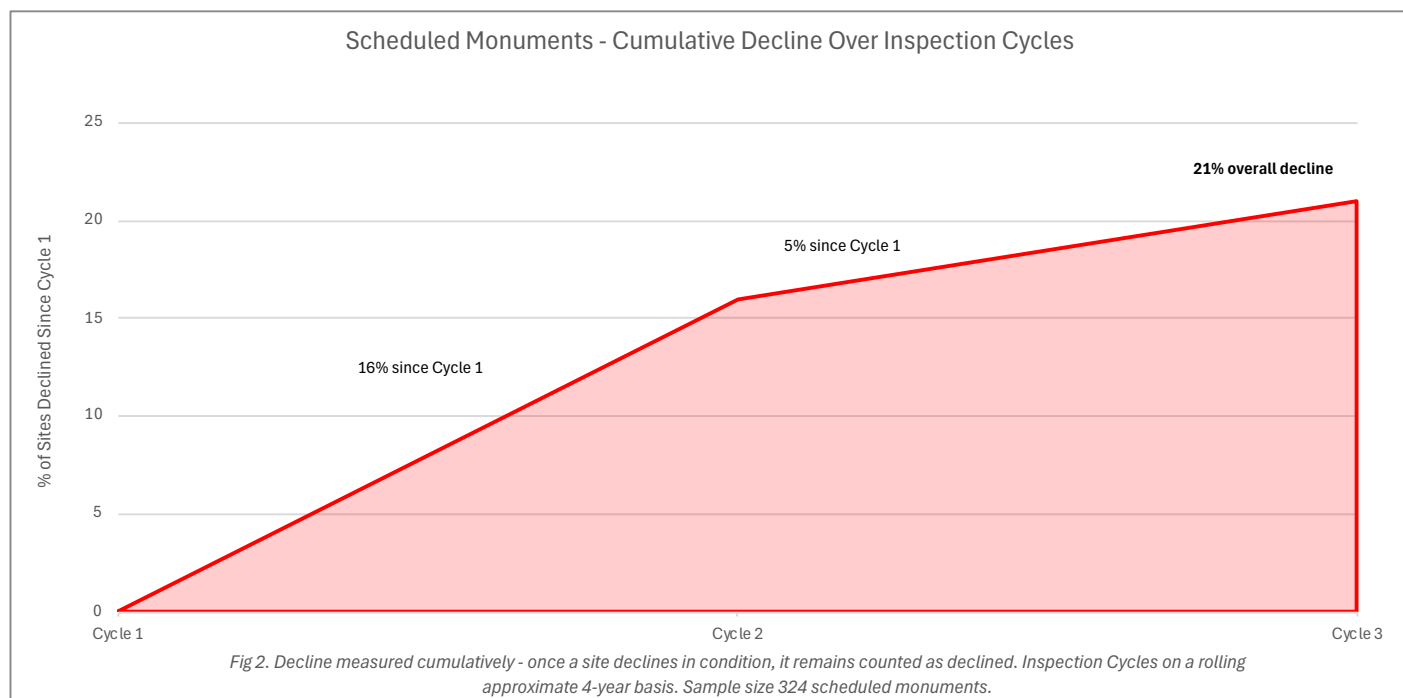


Figure 2 – showing Decline measured cumulatively – once a site declines in condition, it remains counted as declined. Inspection Cycles on a rolling approximate 4-year basis. Sample size 324 Scheduled Historic Monuments.

15. As shown in Figure 2, in the Monument Condition survey a sample of 324 Monuments across three maintenance cycles shows that over 20% of sites have declined in just over a decade.
16. In 2024/25, there were 1,148 historic buildings and structures on this database, just over double the 527 structures recorded in 2018/19. This survey is not comprehensive, and no claim is made to full coverage, but it provides an indication of trends and need. The survey points to a very stark figure. It is also a growing inventory of untapped potential.
17. There were a further 33 monuments on the HARNI register (HARNI Register as of March 2024).
18. There have been a number of high profile incidents at Heritage at Risk buildings over recent years. Evidence has shown that long term neglect can result in collapse or concerns of collapse without timely intervention. In an era of changing climate such incidents are likely to increase as heavier rain and stronger winds will take a greater toll on buildings that are not well maintained.
19. There is also unequal access to the historic environment. In (NISRA)'s annual **Continuous Household Survey 2024-25** adults with a disability were found to be less likely to have visited a place of historic interest than those without a disability (56% and 67% respectively). Analysis by deprivation level showed that adults living in the least deprived areas were more likely to have visited a place of historic interest than those living in the most deprived areas (80% and 51% respectively). In 24/25 a higher proportion

of adults from the Protestant community had visited a place of historic interest within the previous year (69%) than those from the Catholic community (55%).

Funding and investment in the historic environment

20. Overall investment in the historic environment is hard to estimate. Most funding comes from asset owners, but official statistics do not isolate the amount of work that is spent each year on heritage assets. The NI Statistics and Research Agency records that between October and December 2025 £460m was spent on repair and maintenance work in Northern Ireland. This equates to 36% of total output by contractors and public sector labour organisations in that quarter. A proportion of this will have been on heritage assets.

21. The heritage sector also invests in heritage assets. The Historic Environment Stakeholder Group have published research⁹ to show that in 2023/24 £24,791,723 was invested by its members including DfC, Architectural Heritage Fund, National Churches Trust, National Trust, Maritime Belfast Trust, and the National Lottery Heritage Fund in heritage assets. The vast majority of this (96%) was from the Lottery. In addition, DfC invested £864,706 in the maintenance and display of State Care Monuments in the same year.

22. The Department for Communities' Historic Environment Fund (HEF) has been running since 2016. Through four streams: Repair,

Regeneration, Research and Revival the fund has financially supported the care, repair, use, and enjoyment of the historic environment as well as exploring its future potential. Supported projects include the repair of listed homes, businesses and cultural venues, historic monuments and buildings at risk; places of worship have been supported through partnership with National Churches Trust. HEF has contributed to regeneration partnerships like Harnessing Heritage and the Heritage Impact Fund with the Architectural Heritage Fund, the Heritage at Risk Project with Ulster Architectural Heritage, whose officers also partner with DfC, DAERA and the NI housing Executive on the Village Catalyst project.

23. HEF research and revival streams help to demonstrate the huge potential the the historic environment has beyond physical assets. HEF funding has led to new archaeological discoveries and projects like an intergenerational event between primary school children and their grandparents to talk about their vernacular buildings.

24. The statistics quoted earlier recording the significant rise in heritage at risk since 2019 indicate that, despite some high-profile successes, this investment is not enough. There is clearly market failure in addressing the extent of the need currently faced by our heritage assets.

25. Research carried out in 2020 for DfC which compared heritage at risk figures across the UK to house prices demonstrated that this market failure

⁹ NI HERITAGE DELIVERS 2026 CASE STUDIES AND STATISTICS ON HOW HERITAGE BENEFITS NORTHERN IRELAND | Heritage Delivers

is greater in Northern Ireland than in other parts of the UK with the exception of Wales. This appears to equate to property price differences where property prices are lower here, but construction costs are not significantly different.

26. This is important for all of us because research has shown that heritage assets are a public good i.e they bring benefits to society beyond the economic benefits that an owner may receive. Heritage assets can deliver authentic and attractive places which increase our understanding, pride, character and identity, leading to improved wellbeing and community engagement, and delivering prosperity through tourism, investment, skills, regeneration and creativity. Places which are not well cared for can have the opposite effect, creating an air of neglect and reduced community confidence.

27. Responses to this consultation will assist in prioritising funding within the context of the challenges and the potential offered by the historic environment and the greater budgetary context. Work is underway to consider how future funding can support the opportunities that our historic environment presents into the future:

- Support Heritage-led regeneration.
- Tackle Heritage at Risk.
- Address market failure in heritage investment.
- Support town centres, housing and economic development.

- Build heritage skills and employment.
- Deliver on the policy's "Strengthen, Connect and Innovate" principles.

Opportunities

28. In May 2026 the NI Historic Environment Stakeholder Group published 'Heritage Delivers: Case Studies and Statistics on how heritage benefits Northern Ireland'¹⁰. This was organised into four areas where heritage is and can make a positive difference:

- a. Driving economic and social regeneration.
- b. Helping to deliver net zero and sustainable development goals.
- c. Acting as a key resource for health and wellbeing.
- d. Acting as an important resource for learning and developing skills.

26. The document shows how heritage assets are a key resource that can be utilised to attract visitors and inward investment, retain population and aid development right across Northern Ireland and that it has potential to become an important tool in delivering solutions to the housing crisis and the decline of town centres.

27. As they often are existing structures that can be adapted and reused, heritage assets can reduce the use of carbon intensive construction techniques. Protected historic monuments on farmland are also an important repository of biodiversity and of carbon capture on peatland.

¹⁰ NI HERITAGE DELIVERS 2026 CASE STUDIES AND STATISTICS ON HOW HERITAGE BENEFITS NORTHERN IRELAND | Heritage Delivers

28. Engaging with heritage has been statistically proven¹¹ to have significant positive physical and mental health impacts. This can be enhanced if heritage sites are used creatively and actively promoted. There are also significant opportunities for volunteering associated with heritage sites.
29. Heritage assets also remind us that history is not as straightforward as sometimes portrayed, and archaeology continues to reveal new stories. Taken together, this stimulates interest and unlocks learning. The 2023 Independent Review of Education in Northern Ireland recommended that ‘Local heritage should be formally integrated throughout the curriculum (a new policy is required). This may engage more learners including disadvantaged learners and allow them to connect with their local community.’
30. Heritage skills are often specialist and attract increased remuneration. There is strong potential for a society that values its heritage to develop a robust skills base that contributes to its economy and its exports.
31. Policy which builds on this energy, by reaching out to people who don’t normally get involved, could widen our understanding and therefore amplify public interest in caring for our heritage. There is also potential to capitalise on the trend towards heritage activity which is growing through the next generation – in 2022 70% of young people had engaged with heritage¹².
32. Research has also shown that increasing the value that owners, and the public, place on the historic environment can lead to increased investment by both owners and other bodies¹³. Targeted investment to encourage this change, as well as initiatives to leverage additional support to the sector, holds out an opportunity to address decline and to realise the potential that this resource holds for us.
33. Ultimately, the aim of any historic environment policy must be to bring the management of heritage assets onto a more long-term sustainable footing and ensure that their potential to deliver for our people, planet and prosperity can be fully realised.

11 Wellbeing and Historic Environment: Why Bother? | Historic England

12 Experience of culture, arts and heritage by young people in Northern Ireland 2022 | Department for Communities

13 Market Failure Analysis of the Heritage Sector in Northern Ireland

The matrix below sets out 17 draft aims proposed for Historic Environment Policy. The new policy will rest on these aims, and you are invited, in your consultation response, to offer your views on them.

		1. People and Communities	2. Places	3. Partnerships
Historic Environment	Strengthening: A well-cared for historic environment where best practice is universal.	1. Developing best practice to identify and safeguard our historic environment 2. Developing a highly skilled workforce to conserve and sustainably develop our historic environment	3. Investing in the capacity of owners, volunteers and organisations to care for and use local historic assets to meet their needs 4. Empowering communities to adapt, enhance and re-use historic assets, drive regeneration and shape distinctive places	5. Using heritage assets to contribute to Programme for Government including the Wellbeing Framework: Stronger Economy, Better Homes, Healthier Lives and Brighter Futures 6. Maintaining and managing the historic environment in the face of environmental problems
	Connecting: Thriving places - where the unique value of heritage is understood and enjoyed.	7. Supporting inclusive and diverse access to historic places for everyone 8. Exploring the potential for historic places to support wellbeing, and quality of life	9. Aligning the care of heritage assets with distinctive places, landscapes, and seascapes, supporting biodiversity 10. Proudly showcasing, promoting and marketing our unique historic environment locally and internationally 11. Embedding transboundary and international cooperation into the historic environment sector	12. Partnering with government departments, public bodies, and agencies, as well as asset owners, land owners and volunteers, to use the historic environment creatively 13. Reaching out: supporting heritage education and activity for inspiration, learning and enjoyment. 14. Evolving our shared understanding through accessible research, surveys, records, artefacts and archives
	Innovating: A flourishing historic environment sector which is protected, sustained, accessed and used to its full potential .	15. Emphasising the contribution of our historic places to peace - community cohesion, good relations and healing through heritage	16. Collaborating with others to magnify an evidence base for the catalytic effect of heritage investment	17. Driving innovation and enterprise in the historic environment sector towards research, new technologies and new ways of working

Our People. Our Past. Our Place: an inclusive and valued historic environment that delivers for Northern Ireland.

POLICY DIRECTION

How does Historic Environment Policy propose that we meet these challenges and take forward these opportunities?

Strengthening

Protection

34. We will continue to safeguard our historic environment. However, to realise this aim, action like reviewing and evolving

our legislation or designation in line with international conventions is needed. Any changes we make will accord with our own Conservation Principles. The Listed Building and Scheduled Monument Owners' Surveys¹⁴ suggest that building owners agree with this ethos.

The six key conservation principles are:

- Principle 1 - The historic environment is of value to us all
- Principle 2 - Everyone should be able to participate in sustaining the historic environment
- Principle 3 - Understanding the significance of heritage assets is vital
- Principle 4 - Heritage assets shall be managed to sustain their significance
- Principle 5 - Decisions about change shall be reasonable, transparent and consistent
- Principle 6 - Documenting and learning from decisions is essential.

35. Owners want policy to be strong on protecting important buildings and features for people now and for future generations; however, they also want it to be applied in a reasonable way so heritage can be safeguarded whilst making it functional.

36. For some there is a perception that designation means a halt to progress. This is not the case. Legislation, policy and international charters are about respecting historic character in tandem with managing change - not preventing it.

37. In a future where the historic environment is key to our way of life, we will promote a better understanding of protection along with better access to information, advice and support to help people make optimal use of their heritage assets. With the tools to do this accessible to everyone, education and understanding about our historic places and about what conservation means will safeguard the historic environment. Pride in our places will mean that we care about them, understanding their significance¹⁵ and will help towards making sure they are there for future generations.

¹⁴ Listed Buildings Survey

¹⁵ Glossary of conservation terms | Department for Communities

Upskilling to meet demand

38. We will respond to the need to build up skills across the many sectors which feed into and sustain our historic environment. This human resource is fundamental to ensuring that future generations also benefit from our heritage assets. The Owners' Survey identified a key obstacle to owning a listed building was difficulty finding skilled contractors and/or sourcing suitable materials.
39. Skilled and heritage experienced contractors and professionals to discover, maintain, conserve, enhance, study and manage the historic environment are needed to secure a positive future for our places. A thriving, multi-sector heritage skills landscape could offer life-long careers, attract people through established learning pathways, with upskilling and apprenticeship training which includes heritage experience and certification resulting in good jobs and qualification¹⁶ – attracting talent. This need is shared with Northern Ireland's Construction Sector as a whole. Most heritage-relevant skills are transferrable to other parts of the construction industry¹⁷ - which could make an even bigger contribution to a sustainable 'green' economy here. Heritage skills also underpin the success of other sectors such as the museums, film and tourism industries.

40. But skills springing from the historic environment are not unique to heritage – our cultural, tourism and creative sectors also rely on the historic environment for employment. To further this aim, we want to make the most of the potential our historic environment offers because it can spark creativity and imagination - and also be a profitable asset ¹⁸.

Connecting

Engagement, Access and Inclusion

41. Many people living and visiting here already enjoy their historic environment. European Heritage Open Days a free event which take place every September in Northern Ireland is the most widely celebrated cultural event shared by the people of Europe. In 2024/25, 64% of adults here had visited a place of historic interest, the same figure as in 2023/24. District Council, voluntary and community driven initiatives, cultural festivals, and heritage organizations who host talks, tours, exhibitions and events currently embrace and enjoy their local heritage. We will continue to support and amplify people's access to and enjoyment of this part of our environment.
42. Work that can be done by the heritage sector to be more 'outward-facing', removing barriers to advice, representing and addressing the needs and concerns of society and having information which is accessible across all users of the historic

¹⁶ Skills Barometer 2021 update | Department for the Economy

¹⁷ Construction Survey published by the Construction Employers Federation (CEF) – the top four priorities:

- Attracting new entrants by promoting construction careers in schools and communities
- Identifying skills needs and providing specific training tailored to the industry
- Development of entry-level skills programmes
- Enhancing the understanding of routes into the construction industry

¹⁸ Cultural Heritage, Creativity and the Creative Economy | Heritage Counts | Historic England

environment will support people and communities to better understand and care for their assets. A common question is ‘who decides what is ‘significant’? Historic places aren’t always viewed in the same way by everyone. Different people place more importance on different aspects of heritage that are personal to them. Some people connect to their heritage through traditions, music and language. Some place more emphasis on tangible structures; there are different definitions of ‘heritage’. Northern Ireland’s heritage is in some cases contested. There can be a reluctance to engage with some aspects of our historic environment because of those associations. To work towards this aim, we will support a future where our historic environment is strongly associated with building connections.

43. Not everyone can access historic places, but it is relevant to us all. And so, a fully documented and cared for historic environment should deliver rewards equally for people from all walks of life. Contemporary presentation and interpretation of heritage could include the better use of technology, bringing heritage to new audiences.
44. In many cases, it’s only when people enjoy learning what is distinct and relevant about their own place that they begin to consider its value. And usually then, they also want to look after it.

Landscapes and Seascapes and biodiversity

45. The distinction between natural and built environments is often blurred; these places must be managed in ways that reflect the interconnected character of natural and cultural values. With 80% of our 1.4 million hectares of land in agricultural use, it is unsurprising that the majority of archaeological and heritage features are found on farmland. To meet this challenge, we will support people to care for their special landscapes, while recognising the need for them to use their land productively.
46. Surrounded by the sea and home to Lough Neagh, the UK’s largest freshwater lake, our freshwater, marine and coastal environments are rich in cultural significance, both above and below the waterline. These areas contain a wealth of underwater cultural heritage, including shipwrecks, submerged landscapes, and coastal structures that reflect centuries of human activity, conflict, and industry. These underwater cultural heritage assets are irreplaceable and increasingly vulnerable to environmental change, development pressures and rising sea levels.
47. The Historic Environment Policy will support work to identify, conserve, and protect both terrestrial and underwater heritage. Historic urban and rural places can support nature recovery networks, biodiversity net gain and habitat connectivity.

Places and Tourism

48. Our coasts, landscapes and waterways are vital not only for biodiversity and climate resilience, but also for tourism, recreation and cultural understanding. The safeguarding of these environments, both terrestrial and marine, facilitates enduring public engagement with heritage, ensuring that future generations can continue to access, understand, enjoy and use heritage assets above and beneath the waterline.

49. Our historic environment has value to people here, but it also has wider shared island, pan-UK and in fact has global value. This policy will recognise that, having been shaped by globally important historic events, our historic environment offers opportunities to relate with others internationally who feel connected to us. In the nations Brand Index 2025, Northern Ireland's top two Attributes were Natural Beauty (21st out of 50) and Environment (20th). Since 2016, all 23 Attribute scores have shown improvement. The most notable increases were in respondents' willingness to work and live here (+0.35) and perceptions of Northern Ireland as being rich in historic buildings (+0.29). In terms of ranking, historic buildings (along with natural beauty) achieved the largest improvement, each rising three places.

Innovating

50. Historic environment policy will support the protection of our heritage assets. But a key focus of our Historic Environment Policy is a departure from historic environment protection and designation being seen as restrictive.

Instead, the policy will demonstrate how the historic environment is an enabler.

51. The policy aspires to collect and use evidence which is specific to here to demonstrate the relationship between our heritage and culture and their ability to contribute to nearly all wellbeing indicators within the Programme for Government.

52. Creating an evidence base will connect potential to action, supporting activity and investment to contribute much more broadly to people's specific needs: quality of life, to good places to live and to sustaining and to improving the environment. Through a more thorough understanding of how heritage assets act as springboards to stimulate positive social, economic and environmental impacts, investing in our historic environment will more visibly be common sense. This potential impact has been explored in the Strategic Environmental Assessment of this policy. (This document can be found alongside this Background Document on the Historic Environment Policy Consultation page).

53. As such, the policy will provide the basis for the investment of public funding of the historic environment and serve as a guide for the strategic planning of government departments, District Councils, and for individual organisations, owners, users and visitors.

54. Much more broadly than this, the policy sets out the basic principles needed to sustain the historic environment into the future. The principle of 'Strengthening, Connecting and Innovating' our

historic environment, identified by the Culture, Arts and Heritage Taskforce, fits with this concept which relates to sustainable development: boosting any one part of this ecosystem will produce benefits for the others. Equally, a decline in any one part can have a detrimental effect on the others.

55. In reality, the Historic Environment is not a single ‘entity’ in itself – it is so widely distributed and so much a part of our day to day lives that it contributes to, affects and is affected by multiple other strategies, policies and ambitions like:

- Programme for Government 2024-2027
- The Green Growth Strategy
- Architecture and Built Environment Policy NI
- Draft Tourism Strategy for NI – 10-year plan – Department for Economy

Joint Heritage, Culture and Creativity Programme-wide Actions

56. Engagement across the areas covered by the first phase of the Heritage, Culture and Creativity (HCC) Programme has generated a number of common themes and issues which address many of the challenges and opportunities that our research has uncovered. These themes may be considered for action on a **programme-wide basis, applied to the historic environment sector, but also arts, public libraries and museums**. These include:

- a. A desire to address the capital needs of the sectors, in terms of routine maintenance, investment to address access, environmental

and health and safety requirements and a coherent approach to strategic capital development;

- b. Growing evidence of the social and economic value of the sectors and their intrinsic importance to individuals, communities and society more generally; the contribution and value of the work of the museums sector to, for example, the priorities established in the Programme for Government might also be included as part of a wider research initiative under the aegis of the Heritage, Culture and Creativity Programme;
- c. The benefits that might be brought through a programme of skills development to include provision in terms of organisational governance, management, investment and fund-raising; in digital potential and skills; supporting professional development and so on, to strengthen the skills base and support sustainability;
- d. The potential to develop networks, within and across sectors, with a view to catalysing new potential and innovative projects and partnerships;
- e. Recognising that public funding is likely to continue to be constrained, the potential to maximise existing funding sources should be explored along with approaches to generating new income streams and funding options.

POLICY ACTIONS – HAVE YOUR SAY

57. Your views on our proposed vision, aims and suggested sector-wide actions will contribute to a Policy which will demonstrate government’s approach to realising the potential of Northern Ireland’s historic environment; will be a material consideration in decision making at high-level; and will provide a long-term vision, clear aims and measurable metrics which are monitored to ensure it is the most effective tool to help the historic environment deliver for people in Northern Ireland.

The Draft Vision for Historic Environment Policy

In the consultation questionnaire you are also invited to offer your views on the draft vision for the policy, which is intended to describe succinctly what the policy is aiming to achieve.

We propose the following vision:

“Our People. Our Past. Our Place: an inclusive and valued historic environment that delivers for Northern Ireland.”

The Draft Policy Aims

58. In developing the draft policy aims, the Department has taken account of:

- Legislative duties and Policy for the protection and management of the historic environment
- International conventions, charters and declarations
- Government policy priorities, including the Programme for Government
- Stakeholder engagement
- Literature review and best practice from the UK, Ireland and internationally
- The Strategic Environmental Assessment consultation developed as part of this process

59. At the heart of each of the policies developed under the Heritage, Culture and Creativity Programme are three shared drivers: to strengthen, to connect and to innovate, and three common focusses: People & Communities, Places, and Partnerships. When brought together these form a matrix (shown on page 15) which is the basis for the presentation of the policy aims.

OTHER DOCUMENTS RELATING TO THIS CONSULTATION

60. The screening assessments listed below are available for you to consider alongside the Historic Environment Policy vision and aims. There is opportunity to comment on these assessments and how they have shaped this Policy as part

of this consultation. This is because they are relevant to Historic Environment Policy, having been created to consider specific aspects of the Policy around the environment, equality and rural needs.

Strategic Environmental Assessment for Historic Environment Policy

61. In Northern Ireland, Plans and Programmes which may have an impact on the Environment are assessed through the Environmental Assessment of Plans and Programmes Regulations (Northern Ireland) 2004.

from the implementation of the Policy. Any potential adverse effects, and methods to prevent, reduce and as fully as possible offset significant adverse effects have been considered and are also described within this report.

62. In March 2025 the Department for Communities submitted an Historic Environment Policy for Northern Ireland Screening Document to the Department of Agriculture, Environment and Rural Affairs (DAERA), who confirmed the requirement for a Strategic Environmental Assessment (SEA) Report to be carried out.

64. You can find a copy of the Strategic Environmental Assessment Report (SEA) for Northern Ireland Historic Environment Policy alongside this Background Document on the Historic Environment Policy Consultation page.

63. Historic Environment Policy is likely to have a significant effect on Northern Ireland's Environment over the next 10 years and beyond. Much of that impact will be positive impacts on the historic environment. This report demonstrates that there are many complementary positive effects on other aspects of the environment which will result

65. You or your organisation may wish to comment on the SEA Environmental Report for Historic Environment Policy. Questions on the SEA are included in the online Citizen Space survey. Alternatively, responses may be sent by email or by post, and/or included in your Historic Environment Policy response as described in the 'How to respond' section of this document.

Equality Impact Assessment for Historic Environment Policy

66. Section 75 of the Northern Ireland Act 1998 requires that public authorities have due regard to equality issues in carrying out functions relating to Northern Ireland. We have completed an equality screening of the document being consulted upon and have concluded that it does not negatively impact on equality of opportunity for any of the nine categories

specified in Section 75 (religious belief; political opinion; race; age; marital status; sexual orientation; men and women generally; disability; and dependants).

67. You can find a copy of the Equality Impact Assessment (EQIA) for Northern Ireland Historic Environment Policy **here**.

Rural Needs Impact Assessment for Historic Environment Policy

68. The Rural Needs Impact Assessment (RNIA) is a process to ensure that all relevant government outputs are examined carefully and objectively to determine whether they have a different impact in rural areas from that elsewhere, because of the characteristics of rural areas. Where necessary the process should also examine what adjustments might be made to reflect rural needs and to ensure that, as far as possible,

public services are accessible on a fair basis to the rural community.

69. The department has considered this policy in relation to the rural community and has found no potential differential impacts.

70. You can find a copy of the Rural Needs Impact Assessment (RNIA) for Northern Ireland Historic Environment Policy **here**.

CONCLUSION

71. Thank you for taking the time to share your views on the draft vision, policy aims and other matters relating to Northern Ireland's historic environment.

APPENDICES

APPENDIX A - Northern Ireland has legislation and policy in place to protect and manage heritage assets:

- The Planning Act (Northern Ireland) 2011¹⁹
- Historic Monuments and Archaeological Objects (Northern Ireland) Order 1995²⁰
- Protection of Wrecks Act 1973²¹
- Protection of Military Remains Act 1986²²
- Merchant Shipping Act 1995²³
- The Fisheries Act (Northern Ireland) 1966²⁴
- UK Marine and Coastal Access Act 2009²⁵
- The Marine Act (Northern Ireland) 2013²⁶
- Nature conservation and Amenity Lands (Northern Ireland) Order 1985²⁷
- Treasure Act 1996²⁸
- The Finance Act 1976 – (Conditional Exemption)

Changes to heritage assets and their wider environments are managed through existing plans, policies and programmes like:

- Regional Development Strategy²⁹
- Strategic Planning Policy Statement³⁰
- The Environmental Improvement Plan for Northern Ireland 2024³¹
- NI Executive Sustainable Development

A detailed consideration of how Historic Environment policy might support or be supported by this **legislation** is included in the Strategic Environmental Assessment of Historic Environment Policy here.

19 Planning Act (Northern Ireland) 2011

20 Historic Monuments and Archaeological Objects (Northern Ireland) Order 1995

21 Protection of Wrecks Act 1973

22 Protection of Military Remains Act 1986

23 Merchant Shipping Act 1995

24 Fisheries Act (Northern Ireland) 1966

25 Marine and Coastal Access Act 2009 - Explanatory Notes

26 Marine Act (Northern Ireland) 2013

27 The Nature Conservation and Amenity Lands (Northern Ireland) Order 1985

28 Treasure Act 1996

29 Regional Development Strategy 2035 | Department for Infrastructure

30 The Strategic Planning Policy Statement | Department for Infrastructure

31 Environmental Improvement Plan for Northern Ireland 2024 | www.the-ies.org

APPENDIX B

The UK has signed **international conventions, charters and declarations**

which protect heritage assets like:

- The Athens Charter for the Restoration of Historic Monuments (ICOMOS) (1931)
- The Convention for the Protection of Cultural Property in the Event of Armed Conflict (The 1954 Hague Convention for the Protection of Cultural Property in Event of Armed Conflict and its two (1954 and 1999) Protocols)³²
- The Venice Charter for the Conservation and Restoration of Monuments and Sites (ICOMOS) (1964)³³
- The UNESCO World Heritage Convention Concerning the Protection of the World Cultural³⁴ and Natural Heritage (1972)³⁵
- The Declaration of Amsterdam (1975)³⁶
- The Florence Charter 1981 (ICOMOS) (Historic Parks and Gardens)³⁷
- The Australia ICOMOS Charter for Places of Cultural Significance (The Burra Charter 1979, 2013 Revision)³⁸
- The Granda Convention for the Protection of the Architectural Heritage (1985)³⁹
- The Valetta Convention on Protection of Archaeology - 1992)⁴⁰
- The UNESCO Nara Document on Authenticity (1994)⁴¹
- The ICOMOS Charter on the Built Vernacular Heritage (1999)⁴² (cont'd)
- The European Landscape Convention (Florence, 2000)⁴³
- The ICOMOS Charter – Principles for the Analysis, conservation and structural Restoration of Architectural Heritage (Victoria Falls 2003)⁴⁴
- The Leeuwarden Declaration 2018⁴⁵
- UNESCO Convention on Underwater Heritage (2001)⁴⁶
- United Nations Convention on the Law of the Sea⁴⁷
- UNESCO Convention on the Safeguarding of Intangible Cultural Heritage (2003)⁴⁸

32 The_1954_hague_convention_for_the_protection_of_cultural_property_in_the_event_of_armed_conflict_and_its_two_-_1954_and_1999.pdf

33 https://openarchive.icomos.org/id/eprint/432/1/Monuments_and_Sites_1_Charters_Petzet.pdf

34 Cultural heritage | UNESCO UIS

35 1972, Convention Concerning the Protection of the World Cultural and Natural Heritage – ICOMOS CIVVIH

36 Declaration of Amsterdam.doc

37 Microsoft Word - Engl. Florence Charter.doc

38 Burra Charter 2013 (Adopted 31.10.2013)

39 Convention for the Protection of the Architectural Heritage of Europe (Granada, 1985) - Culture and Cultural Heritage

40 Convention for the Protection of the Archaeological Heritage of Europe (revised) (Valletta, 1992) - Culture and Cultural Heritage

41 Nara Document on Authenticity, Report of the Experts Meeting, November 1994

42 Microsoft Word - Engl. Vernacular Heritage.doc

43 The European Landscape Convention (Florence, 2000)

44 Microsoft Word - Engl. Structures.doc

45 Europa Nostra endorses Leeuwarden Declaration on Adaptive Re-Use of Built Heritage - Europa Nostra

46 Underwater Cultural Heritage 2001 Convention | UNESCO

47 UNCLOS+ANNEXES+RES.+AGREEMENT

48 Text of the Convention for the Safeguarding of the Intangible Cultural Heritage - UNESCO Intangible Cultural Heritage

A detailed consideration of how Historic Environment policy might support or be supported by these signed **international conventions, charters and declarations** is included in the Strategic Environmental Assessment of Historic Environment Policy. You can find a copy of the Strategic Environmental Assessment Report (SEA) for Northern Ireland Historic Environment Policy alongside this Background Document on the Historic Environment Policy Consultation page.

This page is intentionally left blank

A Strategic Environmental Assessment (SEA) Report for:

Historic Environment Policy for Northern Ireland

July 2026

Page 77



A Strategic Environmental Assessment (SEA) Report for: Historic Environment Policy for Northern Ireland

The responsible Authority is:

The Department for Communities Historic Environment Division

Contact details:

Natalie O'Rourke

Principal Architect

Historic Environment Division (**HED**)

Department for Communities (**DfC**)

email: Natalie.O'Rourke@communities-ni.gov.uk

This report has been prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations (Northern Ireland) 2004.

Approved by: Manus Deery, Director Department for Communities Historic Environment Division

Date: 10 April 2026

1 Introduction

HE Policy is **likely to have a significant effect on Northern Ireland's Environment** over the next 10 years and beyond. Much of that impact on the historic environment will be positive. This report demonstrates that there are many complimentary positive effects on other aspects of the environment which will result from the implementation of HE Policy. Any potential adverse effects, and methods to prevent, reduce and, as fully as possible, offset significant adverse effects have been considered and are also described within this report.

1.1 Key Facts

The key facts relating to Historic Environment policy for Northern Ireland are set out below:

- The Responsible Authority is the **Department for Communities Historic Environment Division**
- The title is **'An Historic Environment Policy for Northern Ireland'** (HE Policy)
- HE Policy falls under the scope of **Schedule 1** of the Environmental Assessment of Plans and Programmes Regulations (Northern Ireland) 2004 Regulations requiring a full SEA (See also Section 1.3 - Screening).
- The intended period covered by HE Policy is **10 years** from date of publication (proposed 2026 – 2036). However, any impacts associated with the proposed Policy may take effect over a period of many decades. For this reason, a longer-term view will be taken on potential impacts.
- HE Policy will be reviewed after **5 years**.
- The geographical area covered by HE Policy takes in **the whole of Northern Ireland**, including inshore and offshore marine regions. The Policy includes existing and potential transboundary partnerships with the remainder of the UK, the Republic of Ireland and relevant international partners.
- The purpose of HE Policy is to achieve its vision for **an inclusive and valued historic environment that delivers for Northern Ireland**

1.2 The SEA Process

In Northern Ireland, Plans and Programmes which may have an impact on the Environment are assessed through the Environmental Assessment of Plans and Programmes Regulations (Northern Ireland) 2004.¹

The stages of this SEA process are illustrated in Appendix 1a and 1b.

1.3 Screening Stage

In March 2025 the Department for Communities submitted an Historic Environment Policy for Northern Ireland (HE Policy) Screening Document to the Department of Agriculture the Environment and Rural affairs (DAERA), to confirm therein the requirement for a Strategic Environmental Assessment (SEA) Report to be carried out.

Responses from DAERA **confirmed the potential for HE Policy to have significant effects on the environment**, and therefore the need for an **Environmental Assessment** and **Environmental Report** to be carried out.

This response also requested that HE Policy was screened for Appropriate Assessment, to ascertain if there are potential significant negative impacts on protected **Habitats**. This Screening report has been completed, with the conclusion that **there are no significant negative environmental impacts on protected Habitats anticipated as a result of HE Policy**.

¹ [The Environmental Assessment of Plans and Programmes Regulations \(Northern Ireland\) 2004](#)

1.4 Scoping Stage

After Screening, the next stage (Stage A - See Appendix 1a and 1b) of the SEA process is to submit a Scoping Report. The purpose of this SEA Scoping Report was to set out sufficient information to environmental authorities on proposed HE Policy to enable the consultation authorities to form a view on the consultation period and scope/level of detail that will be appropriate for the Environmental Report.

The statutory consultee established within the SEA legislation for Northern Ireland is **the Department of Agriculture, Environment and Rural Affairs (DAERA)**.

Due to the potential for transboundary impacts, In July 2025 the HE Policy SEA Scoping Report was also submitted to the appropriate environmental authorities in the remainder of the UK and the Republic of Ireland.

- **Northern Ireland** - DAERA and DfC Historic Environment Division
- **Scotland** - Historic Environment Scotland, NatureScot, and the Scottish Environment Protection Agency
- **Wales**: Cadw, Countryside Council for Wales (nil response), and the Environment Agency Wales (nil response),
- **England**: Countryside Agency (nil response), English Heritage (nil response), Natural England (nil response), and the Environment Agency (nil response),
- **Republic of Ireland**: Environmental protection Agency - Minister for Housing, Local Government and Heritage (nil response), Applications Unit - Minister for Climate, Energy and the Environment (nil response), Minister for Agriculture, Food, & the Marine (nil response)

The responses received have been considered when finalising both this SEA Environmental Report and Historic Environment Policy.

One of the main outcomes of the Scoping consultation exercise was the advice to ‘scope back in’ the SEA Objectives which concerned **Soil, Air** and **Water** as part of a full **Environmental Assessment**. Therefore, all SEA topics have been included in the subsequent Environmental Assessment of HE Policy.

1.5 Environmental Report Stage

Having consulted on the scope of HE Policy and considering the responses from the appropriate environmental consultants listed in section 1.4, the SEA process (Stage B and C - see Appendix 1a and 1b) requires the **Environmental Assessment** of HE Policy and the preparation of an **Environmental Report**. Consulting with the public on the draft plan or programme alongside the SEA Environmental Report will follow (Stage D see Appendix 1a and 1b).

Schedule 2 of the 2004 Act² defines '**Environmental Assessment**' (Article 2(b)) as a procedure comprising:

- preparing an **Environmental Report** on the likely significant (positive and negative) effects of the draft plan or programme (HE Policy).
- carrying out consultation on the draft plan or programme
- taking into account the Environmental Report and the results of consultation in decision making
- providing information when the plan or programme is adopted and showing how the results of the environmental assessment have been taken into account.

The effects of HE Policy and any potential reasonable alternatives have been considered, along with viable mitigation measures to avoid, reduce or offset adverse effects.

1.6 What comments are being sought through public consultation?

This Environmental Report accompanies the draft HE Policy for a 10-week public consultation between the **14th August 2026 and 23rd October 2026**.

With regards to the Environmental Report, DfC would welcome views on any aspect of this report, but in particular, the detailed findings and predictions for likely significant effects set out within **Parts 4- 9**. The main questions to consider are:

- **Has this environmental assessment identified the likely environmental effects of the options – both intended and unintended?**
- **Do you think there are any additional mitigation, enhancement, or monitoring measures that should be considered?**
- **Do you have any other comments on the environmental assessment?**

² [The Environmental Assessment of Plans and Programmes Regulations \(Northern Ireland\) 2004](#)

Contents

1	Introduction.....	3
1.1	Key Facts.....	3
1.2	The SEA Process	4
1.3	Screening Stage.....	4
1.4	Scoping Stage	5
1.5	Environmental Report Stage	6
1.6	What comments are being sought through public consultation?	6
	Contents	7
2	An outline of the contents and main objectives of HE Policy.....	11
2.1	Policy Context	11
2.2	Background to the need for an Historic Environment Policy	14
2.3	Engagement	15
2.4	An outline of the contents and main objectives of HE Policy	15
3	Assessment of Environmental Impact.....	19
3.1	Zone of influence of Historic Environment Policy in Northern Ireland	19
3.2	Assessment of the relationship of HE Policy with other relevant plans and programmes	20
3.3	Environmental Assessment.....	22
3.4	Mitigation - Minimising Adverse Effects.....	24
4	Places	25
4.1	Part 1- Material Assets – Relationships with other plans, strategies and programmes	25
4.2	Part 2 – Material Assets - Environmental characteristics	37

4.3	Part 3 – Places - HE Policy Impact.....	54
4.4	Part 4 - Suggested HE Policy Aims - Places.....	58
4.5	Landscapes and Seascapes.....	72
4.6	Part 1 – Landscapes and Seascapes – Relationship with other plans, strategies and programmes.....	72
4.7	Part 2 – Landscapes and Seascapes - Environmental Characteristics	79
4.8	Biodiversity, Flora & Fauna	89
4.9	Part 1 - Biodiversity, Flora, Fauna – Relationship with other plans, strategies and programmes.....	89
4.10	Part 2 – Biodiversity, Flora & Fauna - Environmental Characteristics.....	94
4.11	Air, Water and Soil.....	103
4.12	Part 1 - Air, Water and Soil – Relationship with other plans, policies and programmes.....	103
4.13	Part 2 – Air, Water and Soil - Environmental Characteristics	109
4.14	Part 3 – Natural Places – HE Policy Impact	121
4.15	Part 4 - Suggested HE Policy Aims – Natural Places.....	129
5	Planet.....	131
5.1	Part 1 - Climatic Factors – Relationship with other plans, programmes and strategies	131
5.2	Part 2 – Climatic Factors - Environmental Characteristics.....	137
5.3	Part 3 – Planet – HE Policy Impact	144
5.4	Part 4 - Suggested HE Policy Aims – Planet.....	148
6	People.....	151
6.1	Population and Human Health	151
6.2	Part 1- Population and Human Health – Relationship with other plans, programmes and strategies	151
6.3	Part 2 – Population and Human Health - Environmental Characteristics.....	159
6.4	Part 3 – Population and Human Health – HE Policy Impact.....	164

6.5	Part 4 - Suggested HE Policy Aims – People	167
7	Peace	179
7.1	Part 1- Peace – Relationship with other plans, programmes and strategies	179
7.2	Part 2 – Peace - Environmental Characteristics	183
7.3	Part 3 – Peace - Population and Human Health – HE Policy Impact.....	184
7.4	Part 3 - Suggested HE Policy Aims – Peace	186
8	Cultural Heritage.....	189
8.1	Part 1 – Cultural Heritage – Relationship with other plans, strategies and programmes	189
8.2	Part 2 – Cultural Heritage - Environmental Characteristics.....	196
8.3	Part 3 – Cultural Heritage – HE Policy Impact	217
8.4	Cumulative, Synergistic or Secondary Effects - the backbone of HE Policy	220
8.5	Part 3 - Suggested HE Policy Aims – Cultural Heritage	225
9	Transboundary considerations	237
9.2	Alternatives to an HE Policy.....	251
10	Draft Historic Environment Policy – Summary of Aims	255
11	Next Steps.....	256
11.1	Proposed consultation timescales and methods	256
11.2	Stage D – Public Consultation	256
11.3	Stage E – Adoption and Monitoring	257
12	Appendices.....	259
12.1	Appendix 1a and 1b – Table and diagram : Stages of the SEA process (Source: A Practical Guide to the SEA – DAERA)	259

2 An outline of the contents and main objectives of HE Policy

The vision for Historic Environment Policy for Northern Ireland is to achieve **an inclusive and valued historic environment that delivers for Northern Ireland**. This ‘delivery’ is aimed not solely at what the historic environment can deliver in its own interests, but how it can achieve real benefits for people, places and the planet – components which make up our environment. Potential policy impact and the breadth of shared objectives is immediately apparent when assessing the wide range of relevant plans, programmes, policies and strategies which influence and should be influenced by HE Policy.

2.1 Policy Context

Northern Ireland is one of four administrative regions of the UK. It is a predominantly a rural region, with 75% in agricultural use. The population of NI on 30th June 2023 was 1,920,400³. Almost two fifths of the urban population live within the Belfast Metropolitan Area with another sizeable concentration of population around Derry/Londonderry. The region has a distinctive cultural heritage and retains strong rural dimensions through the importance of agriculture and tourism and human interactions with the landscape. NI has 650 km of coastline, the majority of which is protected for its special interest, and several coastal species and habitats are recognised as internationally important.

In this policy, historic environment is defined as **the physical evidence for past human activity**. Having been occupied by humans for over 10,000 years, Northern Ireland has a rich historic environment, which includes a wide variety of historic places and individual or collective heritage assets including archaeology, historic buildings and monuments, historic towns, settlements, landscapes and seascapes. These ‘tangible’ assets are complemented by and complimentary to our ‘intangible’ heritage which comprises for example, oral traditions and expressions, language, performing arts, social practices, rituals and festive events, knowledge and practices concerning nature and the universe and traditional craftsmanship⁴.

³ [Statistical Bulletin - 2023 Mid-year Population Estimates for Northern Ireland](#)

⁴ [Intangible Cultural Heritage \(ICH\) – ICOMOS-UK](#)

With regard to the protection of the physical environment, there are a number of nature conservation, landscape, seascape and cultural heritage designations in NI. For the historic environment these are designated as statutory (protected by law – eg. listed buildings, scheduled historic monuments, protected wrecks) or non-statutory (a material planning consideration – eg. defence heritage, industrial heritage), and can be of international, national or local importance.

The primary statutory management of the historic environment in Northern Ireland falls to the Department for Communities’ (DfC) Historic Environment Division (HED). However, responsibility through ownership and stewardship of the historic environment falls to a wide variety of owners and occupants including but not exclusive to central government, local government, ecclesiastical bodies, businesses, charities and private individuals.

To date, Northern Ireland has never had an Historic Environment Policy.

In Northern Ireland we know about and have a record of 57,558 Heritage Assets⁵ (March 2024). Included in this figure are:

- 1 Transboundary Cultural World Heritage Site (Gracehill)
- 18,222 Sites and Monuments
- 2053 Scheduled Historic Monuments
- 186 Monuments in State care
- 16,321 Historic buildings worthy of recording
- 9124 Listed Buildings
- 16,648 sites on the Industrial Heritage Record (12,663 (24%) protected by formal designation)
- 663 Historic Parks or Gardens (HPGs)
- 4592 Defense Heritage Sites
- 324 battle sites
- 60 conservation areas
- 205 Areas of Townscape Character (ATC)s
- 1090 Local Landscape Policy Areas (LLPAs)

⁵ A building, monument, site, place, area or landscape identified as having cultural significance. HERoNI – HED Map Viewer

- 11 Areas of Significant Archaeological Interest
- 403 Historic Nucleated Settlements
- 832 Maritime Heritage Sites (inc in SMR)
- 384 known wreck sites
- 4 protected wrecks

2.2 Background to the need for an Historic Environment Policy

The Historic Environment in Northern Ireland is in decline. We know this because surveys to monitor the condition of listed buildings and monuments have given us this data⁶. A further survey of listed building and scheduled monument owners identified specific problems for people who own designated heritage assets.⁷

We also know that if it is cared for, understood and used, the historic environment can deliver benefits to people. Statistical evidence for these benefits exists for other parts of the UK and Ireland but is not readily available specifically for Northern Ireland.

A Heritage, Culture and Creativity Programme (HCC)⁸ was established by Northern Ireland's Department for Communities in July 2024 to protect, support and celebrate culture, heritage and the arts. Combined policies will offer an opportunity to understand, amplify and fully realise the rewards offered by Northern Ireland's unique culture and heritage – including the historic environment – to people. The Programme comprises an initial suite of four policies focused on public libraries, accredited museums, the arts, and this policy – a plan for our historic environment.

The HCC Programme has opened up an opportunity to create a Historic Environment Policy which will have catalytic and positive effects for people delivered through the historic environment; HE Policy aspires to reverse a declining historic environment and thus safeguard historic assets, ready to deliver and accommodate much broader benefits. As shown under the SEA Objectives described within this document those benefits are complementary to and shared with benefits to the environment.

⁶ [Survey on the Condition of Listed Buildings | Department for Communities](#)

⁷ [Market failure in heritage | Department for Communities](#)

⁸ [Heritage, Culture and Creativity \(HCC\) Programme | Department for Communities](#)

2.3 An outline of the contents and main objectives of HE Policy

Draft HE Policy is organised under three Sustainable Development Goals for the sectors identified by the Culture, Arts and Heritage taskforce⁹ : **Strengthening, Connecting** and **Innovating**.

These Sustainable Development Goals are not independent, they are interdependent. The same may be said of the interdependency between the historic environment and the natural environment or society. Much of the zone of influence of HE Policy relates to aspects of the environment across both tangible and intangible Cultural Heritage which have a synergistic effect when considered with Population and Health, Material Assets, Climate Change, Landscape, Biodiversity and so on. Strengthening one may provide benefits for the other, and so on. But any negative impacts may also have unintended consequences. Consideration of this multi-faceted impact is reflected in this Environmental Assessment and throughout HE Policy.

HE Policy aims are as follows:

2.1 Engagement

Since September 2024, the HCC Team has held in person engagement sessions with 11 District Councils, all Central Government departments, the Historic Monuments Council, the Historic Buildings Council, the Historic Environment Stakeholder Group NI and the Historic Environment Core Skills Group. Further engagement was carried out internally with other parts of DfC like Community and Voluntary Division, Climate Change Division, Neighbourhood Renewal, and Regeneration. Through this engagement, draft aims for HE Policy have been identified. These have been drafted into a matrix, organised to read across to the other 3 policies in the HCC Programme¹⁰. At the time of writing in early 2026, these 3 policies are also being prepared for public consultation.

What engagement also told us:

Owners:

⁹ [Heritage, Culture and Creativity \(HCC\) Programme | Department for Communities](#)

¹⁰ [The Heritage, Culture and Creativity Programme Purpose and Framework | Department for Communities](#)

HED's Listed Building and Historic Monument Owners' surveys¹¹ told us about the conservation deficit, the need to invest in skills and for access to advice, expertise and information.

Local and central government

HED met with each of the 11 District Councils and all 8 Central Government Departments. We found potential **Partnerships**. connections, shared aims and new ideas which could connect and amplify the actions across a joined-up HCC Programme and within an Historic Environment Policy which is linked to the Programme for Government – a policy which supports **People, Places, the Planet and Peace**.

Subject Matter Experts (SMEs):

HED met within other parts of our own Department (DfC) and we sought the views of the Historic Environment Stakeholder Group¹², The Heritage Skills Group, The Historic Buildings Council¹³ and the Historic Monuments Council¹⁴, who asked us for better partnerships, for people and places to be uppermost. We looked at how we could jointly meet the Department for Communities' ambition: **'Supporting people, Building communities, Shaping places'**.

The policies also reflect the work of the Culture, Arts and Heritage taskforce¹⁵, who engaged with the heritage sector and identified key shared sustainable development goals – to **Strengthen, Connect** and encourage **Innovation** in the culture, arts and heritage sectors in Northern Ireland.

These intersecting themes have created an organising framework, which is common across the four HCC policies, to ensure that the outcomes required are visible and complementary to each other within all four policies.

2.1.1 Sustainable Development Goal: **Strengthening**

Policy aims under this heading will describe the action necessary under HE Policy to **strengthen** the historic environment.

Engagement on HE Policy told us that: 'The Historic Environment in Northern Ireland is in decline.'

¹¹ [Market failure in heritage | Department for Communities](#)

¹² The Northern Ireland Historic Environment Stakeholder group consists of an alliance of representatives from key stakeholder organisations including heritage NGO's, universities, district councils, and government agencies. It is convened by Department for Communities' Historic Environment Division.

¹³ [Historic Buildings Council | Department for Communities](#)

¹⁴ [Historic Monuments Council | Department for Communities](#)

¹⁵ [Heritage, Culture and Creativity \(HCC\) Programme | Department for Communities](#)

Under the theme of ‘Strengthening’, it is first necessary to describe the weaknesses in the Historic Environment in Northern Ireland. Baseline evidence for these issues such as a decline in condition (environmental problems) and the challenges to reversing decline are described throughout this document.

HE Policy describes ‘Our Goal - A well cared for historic environment where best practice is universal.’

The needs and potential actions identified through engagement to reverse this decline, (having a positive impact on the environment and on SEA Objectives) summarise how HE Policy might tackle decline and move Northern Ireland towards best practice: a cared for historic environment.

2.1.2 Sustainable Development Goal: **Connecting**

Policy aims under this heading describe the action necessary under HE Policy to **connect** people to their historic environment.

Engagement on HE Policy told us that: ‘When people connect in and to historic places, they want to visit, live in and look after those places - and they thrive.’

Under the theme of ‘Connecting’, it is first necessary to describe the opportunities to connect people to their Historic Environment in Northern Ireland. Baseline data describes the current opportunities and challenges to realising that connection (environmental problems) throughout this document.

HE Policy describes ‘Our Goal - Thriving places - where the unique value of heritage is understood and enjoyed.’

Scrutiny has taken place through the SEA process of measurable data about how people value, interpret and use their historic places but also how HE Policy aims might target and measure progress to ensure that the historic environment can create thriving places for people.

2.1.3 Sustainable Development Goal: **Innovating**

Policy aims under this heading describe the actions necessary under HE Policy to support **innovation** within the historic environment.

Engagement on HE Policy told us that: ‘The historic environment is not always considered essential to people’s needs.’

Under the theme of ‘Innovating’, it is first necessary to understand the opportunities which might be offered to find creative solutions to challenges and opportunities within the Historic Environment in Northern Ireland. Baseline data describes the current opportunities here and challenges (environmental problems) to this potential.

HE Policy describes ‘Our Goal - A flourishing historic environment sector which is protected, sustained, accessed, and used to its full potential.’

Scrutiny of measurable data about people and how they interact with the historic environment has taken place through the SEA process but also how HE Policy might target and measure progress to ensure that the historic environment can meet people’s needs – encouraging innovation so that it is used to its full potential.

3 Assessment of Environmental Impact

3.1 Zone of influence of Historic Environment Policy in Northern Ireland

HE Policy will impact a geographical area which includes all of Northern Ireland, containing urban areas, rural areas, and its inshore and offshore areas. HE Policy may also have an influence on landscapes and intervisible landscapes/seascapes between Northern Ireland and the Republic of Ireland or Scotland, as shown below. In reality, the intangible cultural historic and current connections between Northern Ireland and other parts of the UK, Ireland and even further to the USA or Nordic Countries are not possible to define on a map.



Fig.1 – Northern Ireland and its physical and intervisible relationship with other regions of the UK and the Republic of Ireland (copyright - Google maps)

3.2 Assessment of the relationship of HE Policy with other relevant plans and programmes

A ‘Heritage Delivers’¹⁶ document was published by the NI Heritage Stakeholder Group (who represent Northern Ireland’s heritage sector) in 2019 and again in 2026. These statistical reports described the breadth of evidence that Heritage is already ‘delivering’ on the ground for people in Northern Ireland. It also demonstrates the potential for much more – how heritage could be used as a resource to deliver more for people, society, the economy and for the environment.

The strength of this potential for delivery can be further demonstrated by the large number of plans and programmes that the historic environment and therefore HE Policy could impact or contribute to.

HE Policy will provide high level advice on Government’s attitude to the historic environment which will influence current and future plans, programmes and strategies. HE Policy is an opportunity to connect positive heritage outcomes to areas outside of the ‘heritage’ world, including those within the NI Programme for Government and strategies or initiatives across central and local government. As a material consideration for development strategies like Local Development Plans and Community Planning, HE Policy will highlight and direct this potential **at a strategic level**.

¹⁶ [NI HERITAGE DELIVERS 2026 CASE STUDIES AND STATISTICS ON HOW HERITAGE BENEFITS NORTHERN IRELAND | Heritage Delivers](#)

3.2.1 **Table 1** – Consideration of proposed level of impact of HE Policy on other plans and programmes

Issues relating to Historic Environment Policy and impact on other plans and programmes	
HE Policy will impact wide-ranging potential environmental effects at a strategic level.	✓
HE Policy will not direct detailed potential environmental effects at a project/site specific level.	X
HE Policy has considered baseline information relating to the strategic issues associated with the protection, conservation, enhancement and use of the historic environment and the wider environment.	✓
HE Policy will not replace the need for project and site specific, plans strategies and individuals to collect detailed project specific baseline data issues associated with the protection, conservation, enhancement and use of the historic environment and the wider environment.	X
HE Policy will inform the development and implementation of Local Development Plans, Community Plans and Historic Environment Plans such as Heritage Plans. It may also impact Climate Action Plans, Inclusive Growth Strategies, Green and Blue Infrastructure Plans for example.	✓
HE Policy will not specifically address issues of land use or infrastructure planning policy, including that relating to consent procedures, but will cross-refer to other policies, plans and programmes where relevant.	X
HE Policy will help identify areas where there may be opportunities for enhancement, or environmental constraints against, the protection, conservation, enhancement and use of the historic environment, and synergistic effects with other aspects of the environment.	✓
HE Policy will not demarcate specific sites or areas for development or avoidance but will identify the issues leading to constraints or opportunities.	X

The tables which describe specific plans, programmes, strategies and environmental protection objectives which have a relationship with HE Policy, are shown under each SEA Topic.

3.3 Environmental Assessment

Environmental Assessment of HE Policy is set out under each SEA Topic in four parts.

Part 1 – Relationship of HE Policy to Other Plans and programmes

The relationships between HE Policy and other plans and programmes, and the relationship between HE Policy and existing international and NI specific statutory and non-statutory environmental protection objectives have been assessed below under each SEA Topic.

Part 2 - Environmental Characteristics

The current state of the environment in Northern Ireland has been described under each topic:

- **Existing baseline:** Aspects of the current state of the environment including baseline data relevant to the aim
Information has been gathered from a number of principal sources including:
 - HERONI¹⁷ – Historic Environment Record of Northern Ireland (HERoNI), Department for Communities (DfC)
 - The Historic Environment Map Viewer¹⁸ (DfC)
 - The Natural Environment Map Viewer¹⁹ (DAERA)
 - The Marine Map Viewer²⁰ (DAERA)
 - The Northern Ireland Environmental Statistics Report 2025²¹ and Heritage Delivers²²

¹⁷ [Historic Environment Record of Northern Ireland \(HERoNI\) | Department for Communities](#)

¹⁸ [Historic Environment map viewer | Department for Communities](#)

¹⁹ [Natural Environment Map Viewer | Department of Agriculture, Environment and Rural Affairs](#)

²⁰ [Marine Mapviewer | Department of Agriculture, Environment and Rural Affairs](#)

²¹ [Northern Ireland Environmental Statistics Report 2025 | Department of Agriculture, Environment and Rural Affairs](#)

²² [NI HERITAGE DELIVERS 2026 CASE STUDIES AND STATISTICS ON HOW HERITAGE BENEFITS NORTHERN IRELAND | Heritage Delivers](#)

- **Environmental Problems:** Environmental Problems which are relevant to the aim including, in particular, those relating to any areas of a particular environmental importance and relevant to the historic environment

Part 3 – HE Policy Impact

A summary below each SEA Topic describes the impact that HE Policy might have on each of these aspects of Northern Ireland's environment, including implications for the environment without HE Policy

Part 4 – Suggested HE Policy Aims

A summary below each SEA Topic describes

- the alternatives considered for each HE Policy aim
- level of positive/negative impact of each HE Policy aim on SEA Topics
- measures to monitor the environmental effects of implementing each HE Policy aim
- proposed mitigation for any potential negative effects of implementing each HE Policy aim

Framework/Criteria for considering HE Policy aim alternatives

The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, or secondary, cumulative and synergistic effects, grouped under the SEA Objectives are shown according to their proposed level of impact on the SEA topics:

Material Assets, Landscape, Population / Health , Climatic Factors, Biodiversity, Flora and Fauna, Soil, Air and Water , Cultural Heritage

Key to level of effect:

Significant positive effect	Positive effect	Minor or neutral effect	Uncertain effect	Adverse effect	Significantly adverse effect
++	+	0	?	-	--

3.4 Mitigation - Minimising Adverse Effects

The SEA process requires this Environmental Report to set out ‘*the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme*’.

The SEA process has identified some uncertain effects on the environment when HE Policy might influence plans, policies or programmes at a project specific level, for example the effects of increased access to historic landscapes on flora and fauna, or impacts on air quality with potentially more car access being required to visit historic monuments in State Care. Potentially adverse effects will be minimised through compliance with legislation and standard survey and mitigation procedures as part of the development/planning application process.

When considering development, planning authorities are required to consider the Strategic Planning Policy Statement (SPPS) as a whole, including specific planning policies, core planning principles and furthering sustainable development objectives that balance sustainable development and protection of the built and natural environment.

The planning requirements and restrictions set out in SPPS must be complied with when planning for any development to ensure that impacts on the natural and built environment are either avoided, minimised or mitigated for. Local Planning authorities will need to carry out or commission SEA of their Local Development Plans; in some cases Habitats Regulations Assessment (HRA) may also be required (i.e. where there is a risk of the conservation objectives of a National Site Network site being adversely affected), and Environmental Impact Assessment (EIA) may also need to be undertaken.

As a result, none of the potentially adverse or uncertain impacts considered as part of the Assessment of HE Policy are deemed to be significant, and specific mitigation measures for HE Policy do not appear needed, so long as the restrictions and requirements already included in SPPS are enforced.

HE Policy will provide direction for the Historic Environment in Northern Ireland for the next 10 years. More subject specific policy, plans or strategies are likely to follow from HE Policy. These will be individually screened to consider their potential to significantly impact the environment and for the requirement to carry out the SEA Process.

4 Places

4.1 Part 1- Material Assets – Relationships with other plans, strategies and programmes

SEA Topic - Material Assets

Protection

Relevant legislation:

- **Planning Act (NI) 2011**
- **Historic Monuments and Archaeological Objects (Northern Ireland) Order 1995**
- **Protection of Military Remains Act 1986**
- **Protection of Wrecks Act, 1973**
- **Merchant Shipping Act 1995**
- **The Fisheries Act (Northern Ireland) 1966**
- **Treasure Act 1996**
- **UK Marine and Coastal Access Act 2009**
- **The Marine Act (NI) 2013**
- **The Climate Change Act 2022**
- **Dealing in Cultural Objects (offences) Act 2003**
- **The Finance Act 1976 (Conditional Exemption)**

International Convention, declaration or charter	Legislative basis, environmental objectives or requirements of the plan or programme	How objectives and requirements of other plans or programmes might be taken on board in Historic Environment Policy (HE Policy) or how HE Policy might impact other plans, policies or programmes	Impacts on HE Policy	HE Policy may impact outcomes
The Granda Convention (1985) for the Protection of the Archaeological Heritage of Europe (revised - The Valletta Convention on Protection of Archaeology - 1992) ²³	This convention is legally binding. The European Convention for the Protection of the Archaeological Heritage (revised) was originally signed by the UK in 1969 but revised in Valetta in 1992. It reflects the nature of threats to archaeological heritage, from unauthorised excavations and major construction projects. The revised text makes the conservation and enhancement of the archaeological heritage one of the goals of urban and regional planning policies. Signatories (including the UK) promise to allow the input of expert archaeologists into the making of planning policies and planning decisions.	Historic Environment Policy will align with the Convention's objective to protect archaeological heritage, but also to promote the wider understanding and appreciation of the historic environment, including public access and education to protect it through the valuing of archaeology, and the role that these material assets have in shaping places.	✓	
UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property (1970) ²⁴	The UK accepted this Convention in 2002. It urges '<i>States Parties to take measures to prohibit and prevent the illicit trafficking of cultural property.</i> <i>It provides a common framework for the States Parties on the measures to be taken to prohibit and prevent the import, export and transfer of cultural property.</i> <i>The return and restitution of cultural property is central to the Convention and its duty is not only to remember but to fundamentally safeguard the identity of peoples and</i>	Historic Environment Policy will support and align with the principal objective in that material cultural property (the Historic Environment) should be safeguarded. HE Policy will support activity which will align with the articles in the convention such as: • <i>Draft[ing] appropriate national legislation</i> • <i>Establish[ing] national services for the protection of cultural heritage (HED)</i> • <i>Promot[ing] museums, libraries, archives</i> • <i>Establish[ing] national inventories (HERoNI)</i>	✓	

²³ [Convention for the Protection of the Archaeological Heritage of Europe \(revised\) \(Valletta, 1992\) - Culture and Cultural Heritage](#)

²⁴ This is supported by **UNIDROIT Convention on Stolen or Illegally Exported Cultural Objects: The Role of International Arbitration (1995)**

	<i>promote peaceful societies whereby the spirit of solidarity will be strengthened.</i>	<i>Implement[ing] educational programmes to develop respect for cultural heritage</i>		
The Convention for the Protection of Cultural Property in the Event of Armed Conflict (The 1954 Hague Convention for the Protection of Cultural Property in the Event of Armed Conflict and its two (1954 and 1999) Protocols)²⁵	Ratified by the UK in 1954, the Hague Convention is intended to play a role in the protection of heritage. It is the first and the most comprehensive multilateral treaty dedicated exclusively to the protection of cultural heritage in times of peace as well as during an armed conflict. It aims to protect cultural property, such as monuments of architecture, art or history, archaeological sites, works of art, manuscripts, books and other objects of artistic, historical or archaeological interest, as well as scientific collections of any kind regardless of their origin or ownership. The United Nations Security Council resolution 2347, adopted in March 2017 equates the deliberate destruction of cultural heritage with a war crime in certain circumstances.	Historic Environment Policy will share the objective of this convention to protect the material assets which represent the Historic Environment, including architecture, monuments, archaeological sites and artefacts in a collective, global capacity.	✓	
The Declaration of Amsterdam (1975)²⁶	This Declaration has no legal force but recommends best practice and doctrine. Signatories recognise that: <i>'The conservation of the architectural heritage should become an integral part of urban and regional planning.</i> <i>Integrated conservation involves the responsibility of local authorities and calls for citizens' participation.</i>	Historic Environment Policy will support and enhance the objectives of this Declaration in Northern Ireland, focusing on integration, social factors and inclusiveness, access and citizen's participation. It will furthermore support the objectives which necessitate support of heritage skills and investment to support owners of heritage and therefore material assets.	✓	

²⁵ [The 1954 hague convention for the protection of cultural property in the event of armed conflict and its two - 1954 and 1999.pdf](#)

²⁶ [Declaration of Amsterdam.doc](#)

	<i>The success of any policy of integrated conservation depends on taking social factors into consideration.</i> <i>Integrated conservation necessitates the adaptation of legislative and administrative measures.</i> <i>Integrated conservation necessitates appropriate financial means.</i> <i>Integrated conservation requires the promotion of methods, techniques and skills for restoration and rehabilitation.'</i>			
The Australia ICOMOS Charter for Places of Cultural Significance (The Burra Charter 1979, 2013 Revision)²⁷	This Charter has no legal force but recommends best practice and doctrine. It provides guidance for the conservation and management of places of cultural significance (cultural heritage places). Signatories agree that conservation is an integral part of the management of places of cultural significance and is an ongoing responsibility.	Historic Environment Policy will support and enhance the strategic objectives of this Charter in Northern Ireland, focusing on the responsible care for and enhancement of the connection of material heritage assets to places and intangible culture.	✓	
The Florence Charter 1982 (International Council on Monuments and Sites) requires responsible authorities to adopt appropriate measures for the identification, listing and	<i>An historic garden is an architectural and horticultural composition of interest to the public from the historical or artistic point of view... As such, it is to be considered as a monument. As a monument, the historic garden must be preserved in accordance with the spirit of the Venice Charter. However, since it is a living monument, its preservation must be governed by specific rules which are the subject of the [Florence] charter.</i>	Historic Environment Policy will support and enhance the strategic objectives of this Charter in Northern Ireland, reinforcing the protection of historic gardens as heritage assets – but also their contribution to wellbeing, place making and biodiversity.	✓	

²⁷ [Burra Charter 2013 \(Adopted 31.10.2013\)](#)

protection of historic gardens UNESCO Nara Document on Authenticity (1994)²⁸	This Document emphasises the importance of cultures which ‘belong to the world’, but are in the hands of those to whom tangible and intangible heritage is located, and so the responsibility for the care and interpretation of that heritage rests with each place. <i>‘All cultures and societies are rooted in the particular forms and means of tangible and intangible expression which constitute their heritage, and these should be respected.’</i> and <i>‘...the cultural heritage of each is the cultural heritage of all. Responsibility for cultural heritage and the management of it belongs, in the first place, to the cultural community that has generated it, and subsequently to that which cares for it.’</i>	HE Policy will emphasise the importance of the international responsibility for the care of our local historic environment to the world and that it rests with people in Northern Ireland. HE Policy also supports the diversity and multiplicity of heritage interpretation – emphasising that access to heritage should belong to everyone as a public good.		
ICOMOS Charter on the Built Vernacular Heritage (1999)²⁹	The Charter declares that: <i>‘The built vernacular heritage is important; it is the fundamental expression of the culture of a community, of its relationship with its territory and, at the same time, the expression of the world's cultural diversity.’</i> <i>‘Due to the homogenisation of culture and of global socio-economic transformation, vernacular structures all around the world are extremely vulnerable, facing serious</i>	HE Policy will align with the principles of this charter with respect to protection, conservation and enhancement of material assets but also to landscapes and craft skills, recognising the unique way that people have responded to their environment.		

²⁸ [Nara Document on Authenticity, Report of the Experts Meeting, November 1994](#)

²⁹ [Microsoft Word - Engl. Vernacular Heritage.doc](#)

	<i>problems of obsolescence, internal equilibrium and integration’.</i> <i>‘It is necessary, therefore, in addition to the Venice Charter, to establish principles for the care and protection of our built vernacular heritage.’</i>			
Leeuwarden Declaration 2018 ³⁰	The Declaration, signed by the UK in 2018 <i>‘highlights the multiple benefits of re-using built heritage, calls for smart and quality-based processes in adaptive re-use projects and stresses the importance of the dialogue between heritage and contemporary architecture.’</i>	Historic Environment Policy will align with the values and good practices which form the objectives of the Leeuwarden Declaration, including an emphasis on the importance of ‘<i>cultural heritage</i>’ for sustainable development, and the re-use of material heritage assets, demonstrating and supporting the multiple benefits for people, places and the planet.	✓	
Other plan/programme or strategy	Legislative basis, environmental objectives or requirements of the plan or programme	How objectives and requirements of other plans or programmes might be taken on board in Historic Environment Policy (HE Policy) or how HE Policy might impact other plans, policies or programmes	Impacts on HE Policy	HE Policy may impact outcomes
Regional Development Strategy 2035 (RDS) ³¹	The RDS has a statutory basis. It sets out the framework for the spatial development for the Northern Ireland Region up to 2035. The RDS is cross-cutting with linkages to other key government policies and statutory legislation.	Historic Environment Policy will align with and expand on the Regional Development Strategy 2035 (RDS) which lists as one of its 8 key aims to: <i>‘Protect and enhance the environment for its own sake.’</i> It sets out regional guidance to <i>“Conserve, protect and where possible, enhance our built heritage and our natural environment”</i> HE Policy will provide high level advice on Government’s attitude to the historic environment which will influence	✓	✓

³⁰ [Europa Nostra endorses Leeuwarden Declaration on Adaptive Re-Use of Built Heritage - Europa Nostra](#)

³¹ [Regional Development Strategy 2035 | Department for Infrastructure](#)

Strategic Planning Policy Statement (SPPS)³²	(SPPS) regional strategic objectives for archaeology and built heritage are to: • <i>secure the protection, conservation and, where possible, the enhancement of our built and archaeological heritage;</i> • <i>promote sustainable development and environmental stewardship with regard to our built and archaeological heritage; and</i> • <i>deliver economic and community benefit through conservation that facilitates productive use of built heritage assets and opportunities for investment, whilst safeguarding their historic or architectural integrity.</i>	future development of the RDS and therefore material assets. Historic Environment Policy will align with and expands on the Strategic Planning Policy Statement HE Policy will provide high level advice on Government's attitude to the historic environment which will influence the implementation of the SPPS (SPPS is based on protective legislation, however, it is guided by policy in practice.) HE Policy will set the framework for managing and protecting heritage assets by conserving, enhancing and promoting 'sustainable development and environmental stewardship' of assets, which may be protected, may be of heritage value (even if unprotected) or may sit within natural or cultural sites such as LLPAs (Local Landscape Policy Areas) AONBs (Areas of Natural Beauty) and Conservation Areas – this will have a beneficial effect on protected assets and sites and their wider settings – the environment. HE Policy will recommend how the historic environment can support places (and therefore material assets) at varying scales to make the most of their heritage assets to benefit local communities, and their local environments. This should impact actions and strategies or local plans such as Local Development Plans, Heritage Plans and Climate Change Action Plans		
--	--	---	---	---

³² [Strategic Planning Policy Statement for Northern Ireland \(SPPS\)](#)

Sustainable Development Strategy ‘Everyone’s involved’ 2010 and United Nations Sustainable Development Goals	This provides a framework for sustainability across Government departments and has been supplemented by work on the United Nations Sustainable Development Goals (UNSDGs) and mapping of same across the Programme for Government outcomes and indicators,	for local councils.’ <i>Deliver[ing] economic and community benefit</i>’, whilst benefitting the environment. HE policy will help ensure that the reference to heritage and the promotion of sustainable land and marine management in the 2010 document will be fully realised.		
Northern Ireland Local Development Plans (LDPs)	Local Development Plans set out how an area should look in the future by deciding the type and scale of development and where buildings should be allowed. Each council must prepare a development plan for their area in consultation with the local community. The aim of the plan is to make sure there is enough land available for the area’s housing, employment and community facilities, while protecting important landscape and environmental features. Through the development plan, councils can identify the best locations for new homes, businesses and infrastructure while also protecting places of value to people or wildlife. The plans are an important consideration in dealing with planning applications and should help guide decision-making.	Representing the government’s view on the historic environment, HE Policy will impact the establishment, management and future review or amendment of Local Development Plans. LDP Strategy will include the vision, objectives, growth strategy and strategic policies for each council area. This should address the economic, social and development issues of an area by indicating where development, including regeneration, should take place and what form it should take. LDPs should have conformity with central government regional plans, policy and guidance – and therefore Historic Environment Policy which supports regeneration and the protection of landscape and environmental features should have a key impact on LDPs and the future review of LDPs.		

NI Architecture and Built Environment (A+BE) Policy³³ and ‘Living Places – An Urban Stewardship and Design Guide for NI’³⁴	<i>At the heart of the ‘Architecture and the Built Environment for Northern Ireland’ policy is a demand for a step change in the quality of design, construction and performance of publicly funded development.</i> <i>The Policy Vision is for: ‘An attractive, healthy, safe and sustainable built environment which functions efficiently and enriches the experience of living for everyone in Northern Ireland. Through good architecture, landscape and urban planning our cities, towns and neighbourhoods can be made more inspiring and welcoming. Evidence shows that we respond positively to buildings and places which are visually attractive and efficient in use. In all areas social, economic and environmental benefit result from investment in good design.’</i> <i>The Urban Stewardship and Design Guide aims to ..‘clearly establish the key principles behind good place making. It seeks to inform and inspire all those involved in the process of managing (stewardship) and making (design) urban places, with a view to raising standards across Northern Ireland.’</i>	The policy vision for the A+BE Policy (currently under review at time of writing – Autumn 2026) is not dissimilar to that of HE Policy – though heritage assets in many cases predate the advent of the ‘architect’. The contribution of heritage to attractive and sustainable places is a shared goal between the two policies. The A+BE Policy is an NI Executive wide Policy and therefore is intended to have wide reaching impact. The partnership between creative, high-quality development which conserves and where necessary enhances heritage assets and places in important to both policies which support and complement each other’s objectives.	✓	✓
Draft ‘Circular Economy’ Strategy (2023) And The Draft Investment Strategy for	There are four key objectives as set out by DfE in their Draft Circular Economy Strategy. One of the key sectors to create a circular economy and reduce carbon is the built environment, including a hierarchy for the built environment sector to prioritise circularity, with maintenance and prolonging the life of a	There is a need for skills to identify, protect, enhance and promote Northern Ireland’s heritage assets, which are an existing but currently underused resource. Historic Environment Policy will support skills which meet this need. The Draft Circular Economy Strategy points directly to creating skills for as well as maintaining and adapting	✓	✓

³³ [Architecture and Built Environment Policy | Department for Communities](#)

³⁴ [Living Places - An Urban Stewardship and Design Guide for Northern Ireland | Department for Infrastructure](#)

Northern Ireland 2050 (ISNI 2050)	building, its components and materials at the top of the hierarchy.	existing (including historic) buildings for the future as part of a circular economy. HE Policy should demonstrate the need to continue the policy emphasis on heritage as a cornerstone to a circular economy. <i>Environment Pillar: ‘We have a responsibility to current and future generations to protect and enhance our environment and to conserve the rich diversity that our natural and built heritage possesses’.</i>		
The Adaptive Re-use of Existing Assets – The Strategic Investment Board (SIB)³⁵	The Strategic Investment Board works with The Executive Office, Department of Finance and spending departments to create the Investment Strategy for Northern Ireland (ISNI). It sets out priorities and objectives for investment in infrastructure such as roads, transport, schools, health facilities, social housing, water infrastructure, etc. In 2024 SIB published a document which recommends the Adaptive Re-use of buildings. ‘Maximising our existing resources, reducing carbon emissions and building community cohesion are central tenets of the NI Executive’s plan for Northern Ireland. These core objectives are outlined in the Draft Investment Strategy for Northern Ireland (ISNI) and the Adaptive Re-Use of Existing Assets aligns perfectly with this strategic framework, as well as several regulatory commitments, strategic frameworks and environmental benchmarks set by both the NI government and key professional entities.’	Historic Environment Policy will provide high level advice on Government’s attitude to the historic environment, supporting the use and re-use of material heritage assets including buildings and infrastructure. HE Policy will support and influence the SIB’s direction and actions on investment in the use and re-use of government heritage assets.		

³⁵ [AREA-Report-2024.pdf](#)

Housing Supply Strategy 2024 - 2039 – Department for Communities	DfC's Housing Strategy names the re-use and upgrade of historic housing stock as part of the strategy to help people <i>'feel a sense of belonging'</i> . It suggests that <i>'the opportunity to adapt, recycle and re-use existing buildings to increase supply and create thriving communities'</i> is used because heritage assets <i>'contribute to visual amenity and attractiveness'</i> .	Strategies to maintain, enhance, retrofit for energy efficiency and re-use heritage assets which may not have been originally designed for housing align with intended HE Policy aims – the two could work together to create shared positive outcomes relating to long lasting, characterful places to live.	✓	✓
Shaping Sustainable Places³⁶ Department for Communities	Shaping Sustainable Places is a long-term programme of regeneration interventions that aims to reshape village, town and city centres by DfC. <i>'It is proposed that Shaping Sustainable places interventions could include, but not be limited to, those that: ..Restore heritage assets.'</i>	HE Policy will support and amplify key ambitions of in the draft Shaping Sustainable Places Programme which include Regeneration and Placemaking, Community Planning, Growing a Globally Competitive and Sustainable Economy, providing more Social, Affordable and Sustainable Housing, and meeting High Street Taskforce Recommendations.	✓	✓
City and Growth Deals – Invest NI³⁷	<i>A City or Growth Deal is a bespoke package of funding and decision-making powers negotiated between government and local authorities. They are aimed at helping to harness additional investment, create new jobs and speed up inclusive and sustainable economic growth.</i>	With historic structures potentially acting as unique, bespoke projects which visually enforce identity and pride in places, heritage assets which are at the centre of regeneration projects could compliment, enhance and even be the start of City and Growth Deals, such as those at Carrickfergus where the state care Castle is a unique draw.	✓	✓

³⁶ [Shaping Sustainable Places consultation](#)

³⁷ [City and Growth Deals | Invest Northern Ireland](#)

(End)

4.2 Part 2 – Material Assets - Environmental characteristics

SEA topic	SEA Objective
Material assets	Create places, spaces and buildings that work well, wear well and look well

4.2.1 Material Assets – Existing Baseline

There are over 57,558 known Heritage Assets³⁸. The location of known and designated assets is available on a spatial dataset (HED Map Viewer). These are listed below (please note this list is not exhaustive, for example there are many historic artefacts, archives and information within the Public Records Office of Northern Ireland (PRONI) and numerous National and Local Museums).

In Northern Ireland there are:

- 9,124 listed buildings (March 2024) Some listings include multiple buildings; therefore, the total number of buildings protected in this way is slightly higher.
- 186 Monuments in State care (March 2024)
- 2,053 scheduled historic monuments (March 2024) Overall, there has been a 36 per cent increase in the number of scheduled monuments since 2001/02
- There are 15,100 Sites and Monuments (March 2024) excluding State Care and scheduled monuments
- 663 Historic Parks, Gardens or Demesnes (HPGs) Grade A and A*
- 1 Transboundary Cultural World Heritage Site
- 4 protected wrecks (March 2024)
- 832 Maritime Heritage Sites (included in Scheduled Monument Record)
- 384 known wreck sites

³⁸ HERoNI – HED Map Viewer [Historic Environment map viewer](#) | [Department for Communities](#)

- 16,062 (March 2023) sites on the Industrial Heritage Record - 12,663 (24%) protected by statutory designation(s). These include infrastructure in daily use such as bridges, railway structures, canals or elements of Ni Water's Spelga Dam complex.
- 4593 (March 2023) Defence Heritage Sites
- 0 Local Lists

Local Places

- There were just over 600 listed building consent applications in 2023- 2024, and 1400 further non-statutory applications affecting listed buildings or their settings.
- 16,062 Historic buildings worthy of recording are included on the NI Buildings database – this means that circa 7,000 heritage assets were worthy of survey and are recorded but fell short of being of 'special interest'.
- As seen in the work of the Architectural Heritage Fund³⁹, The National Churches Trust⁴⁰ and Heritage Trust Network⁴¹, there are multiple examples which show how meeting local needs stems from caring for and investing in long established heritage networks, assets and places.
- Northern Ireland has 2,500 churches and chapels – more per head than anywhere else in the United Kingdom⁴²; Ecclesiastical heritage makes up about 10% of NI's listed and therefore most special buildings, with a further 193 scheduled monuments affiliated with church sites. Standing at the heart of most communities: graveyards, ecclesiastical sites and '*...churches provide so many essential services for communities across the UK. From youth groups to foodbanks, they help to support the wellbeing of millions of people, including the most vulnerable in society*⁴³.'
- National Churches Trust 'House of Good' report states that over £16 of social good is created in communities by £1 invested in churches.
- There are many monuments, graveyards pumps and telephone boxes in all parts of Northern Ireland which are small scale opportunities for communities to come together and care for heritage in their communities, creating a shared sense of pride and community cohesion, as well as good relations.
- Community Asset Transfer (CAT) is the process of transferring publicly-owned land and buildings from public authorities to community organisations. These assets, which can be heritage assets managed by public bodies, can be revitalised under community ownership or

³⁹ [Northern Ireland | The Architectural Heritage Fund](#)

⁴⁰ [Treasure Ireland: specialist support for Northern Ireland places of worship | National Churches Trust](#)

⁴¹ [Northern Ireland - Heritage Trust Network](#)

⁴² [Supporting Northern Ireland's churches and chapels | National Churches Trust](#)

⁴³ [The House of Good research | National Churches Trust](#)

management to better serve local needs. CAT empowers communities to utilise these resources for local development, creating social, economic, and environmental benefits.⁴⁴

- DfC supports activity which enables City Deals such as works to Carrickfergus Castle, the Small Settlements Scheme⁴⁵, where heritage will be a key part of growth and development, and new ‘Neighbourhood Community Partnerships’, for whom heritage has been identified as a commodity, not just for ‘heritage’s sake’ but as a key cornerstone for communities, contributing to their sense of place.
- DfC has a Housing Supply Strategy⁴⁶, where the re-use and upgrade of historic housing stock forms part of the strategy to help people ‘feel a sense of belonging’, ‘the opportunity to adapt, recycle and re-use existing buildings to increase supply and create thriving communities’ is used and heritage asset ‘contribute to visual amenity and attractiveness’.
- The Executive’s draft Anti-Poverty strategy⁴⁷ aspires to eliminate disadvantage, making all parts of NI equal.
- DfC’s Fuel Poverty strategy⁴⁸ aspires to improve the energy efficiency of homes, including those in historic buildings, to ensure the most vulnerable in our society are not left behind in efforts to address climate change. The response to the consultation, published 21/10/25, suggests support for a Whole House Approach (Q11) and strong support for common quality assurance standard for energy efficiency (Q32) of [Fuel Poverty Strategy Consultation](#).
- The Protocol for the Care of the Government Estate⁴⁹ is a document set out by the NI Executive explaining how departments and agencies will put their commitment into practice for caring and protecting historic estates, many of which sit amongst local communities and within shared places and landscapes, accessible to the public.
- In 2025 DfC commissioned AHF to research a ‘Town Centre Heritage Regeneration Fund’ to consider investment options to address acute housing need in market towns by reuse of vacant heritage assets.
- The Independent Assessment used to help inform the third UK Climate Risk Assessment (CCRA3)⁵⁰ assesses 61 risks and opportunities from climate change to Northern Ireland, including to business, infrastructure, housing, the natural environment, our health and from the impacts of climate change internationally. Risks to cultural heritage have been identified. As well as risks to people, communities and buildings from flooding.

⁴⁴ [Community Asset Transfer - Development Trusts NI](#)

⁴⁵ [Ministers announce collaborative approach to regeneration for small settlements | Department for Communities](#)

⁴⁶ [Housing Supply Strategy 2024 - 2039 | Department for Communities](#)

⁴⁷ [Poverty Policy | Department for Communities](#)

⁴⁸ [Warm Healthy Homes 2026-2036: A new Fuel Poverty Strategy for Northern Ireland | Department for Communities](#)

⁴⁹ [Protocol for the Care of the Government Historic Estate | Department for Communities](#)

⁵⁰ [Summary for Northern Ireland \(CCRA3-IA\) - UK Climate Risk](#)

- The Northern Ireland Climate Change Adaptation Plan (NICCAP3) - The Climate Change Act 2008 (the 2008 Act) places a statutory duty on Northern Ireland Executive Departments to lay programmes before the Northern Ireland Assembly, which set out their objectives, policies, proposals and timelines for introducing those policies and proposals in response to the most recent UK Climate Change Risk Assessment (CCRA). To fulfil this legal requirement the Department of Agriculture, Environment and Rural Affairs (DAERA) has led on the development of a series of single coordinated adaptation programmes, which are known as the Northern Ireland Climate Change Adaptation Programme (NICCAP), since the 2008 Act came into effect. A Key Area of NICCAP is that of *‘People and the Environment’* :
 - *This key area combines 4 thematic areas due to the co-dependencies between them and links the themes of Towns & Cities, Buildings, Health, and Community Preparedness & Response ... This key area is concerned with the impacts of climate change on our lived experiences and so looks at how the built and urban environment we live in interacts with our health and how climate change poses risks to these. It also recognises the importance of a community’s ability to prepare for and respond to emergency situations such as extreme weather events linked to climate change. The chapters each lay out the identified risks and opportunities for each theme and the actions relating to these risks ..’*

In addition:

- There were 99 active listed building enforcement requests in March 2024.
- There were 6 incidents of unauthorised change to monuments in 2023-24.
- It is estimated that pre-1919 buildings make up just over one sixth⁵¹ of buildings in Northern Ireland, however, the number lost annually is not monitored.
- Thousands of artefacts collected from Licensed Archaeological excavations currently held in storage.

Skills:

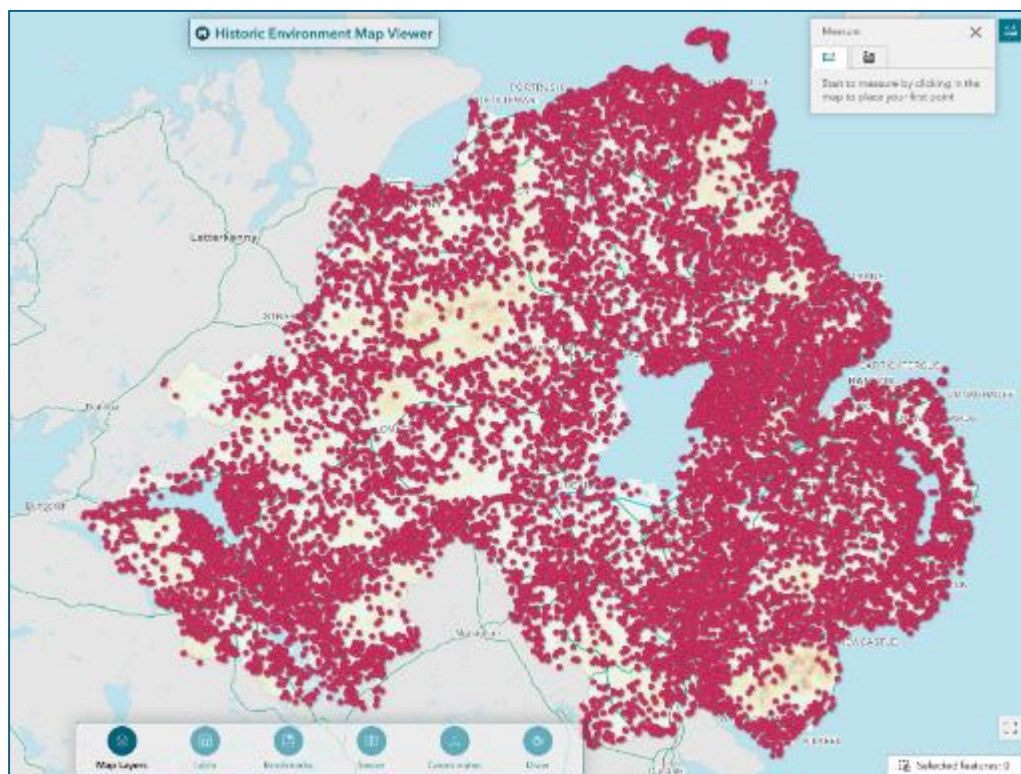
- NI Heritage Core Skills Group and NI Heritage Skills Reference Group meet quarterly
- Work is underway to establish HED as a ‘Traditional Skills Centre of Excellence’ - including recent recruitment to HED’s Conservation Works Team
- King’s Foundation/All-Ireland Heritage Skills Programme 2026-30 – work is ongoing to support new apprentices in heritage skills
- A Potential All-island skills centre is not yet off the ground.
- CITBNI CRESI project 2022-25 - training and events, the seeking of financial support through the development of bids, the long-term aim of establishing a viable way of delivering heritage training on an ongoing basis – project ends this year (2025).

⁵¹ [f11c5d88-3ad7-42da-b3a3-ad0e38063fc1.pdf](#)

The images below give an indication of the breadth and location of some types of Historic Assets in Northern Ireland (see also further assets under later SEA Topics).

Fig 2 – Sites and Monuments – HERoNI HED Map Viewer⁵² (Crown Copyright)

- 18,222 Sites and Monuments
- 2053 Scheduled Historic Monuments
- 186 Monuments in State care



⁵² [Historic Environment map viewer](#) | Department for Communities

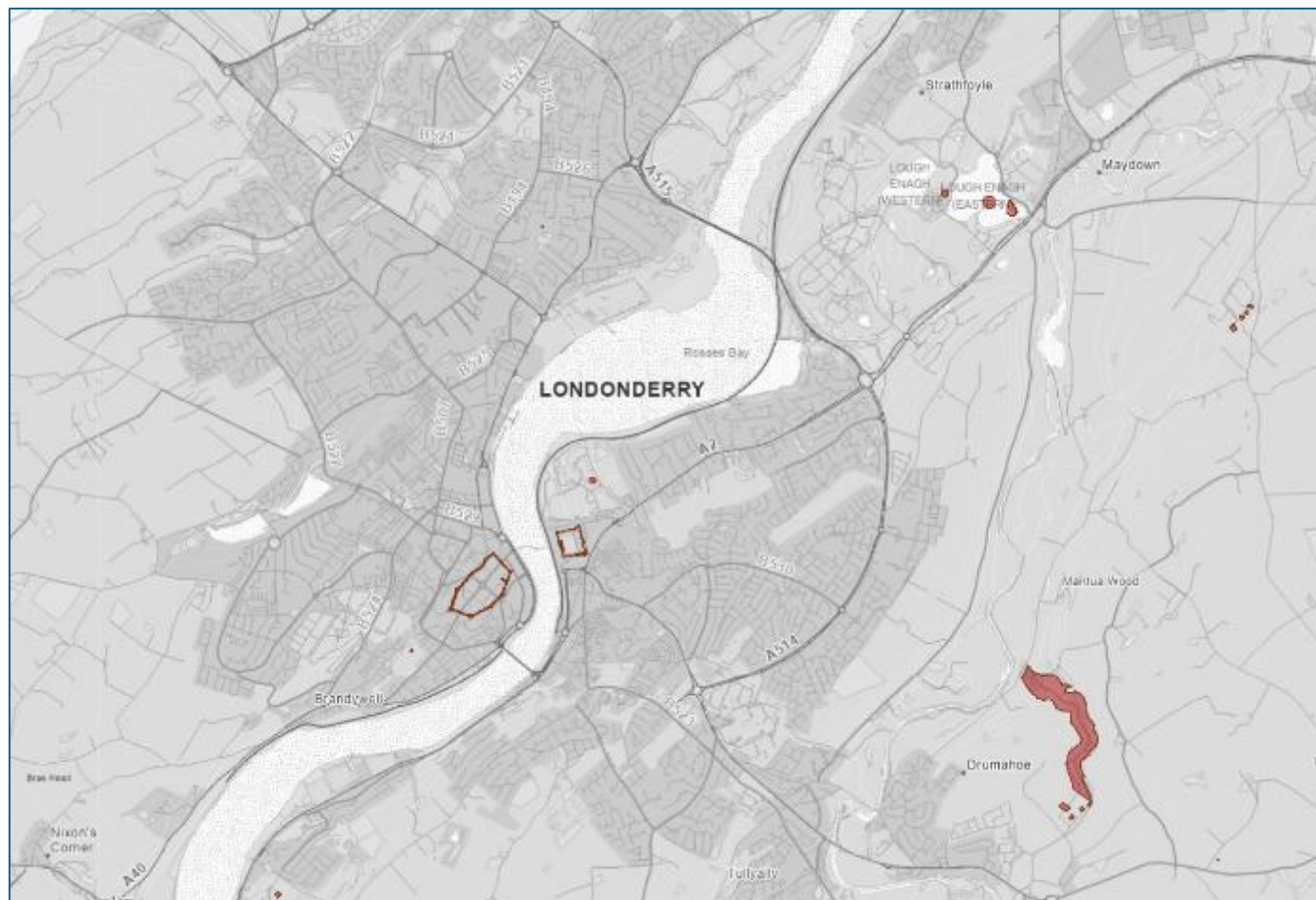
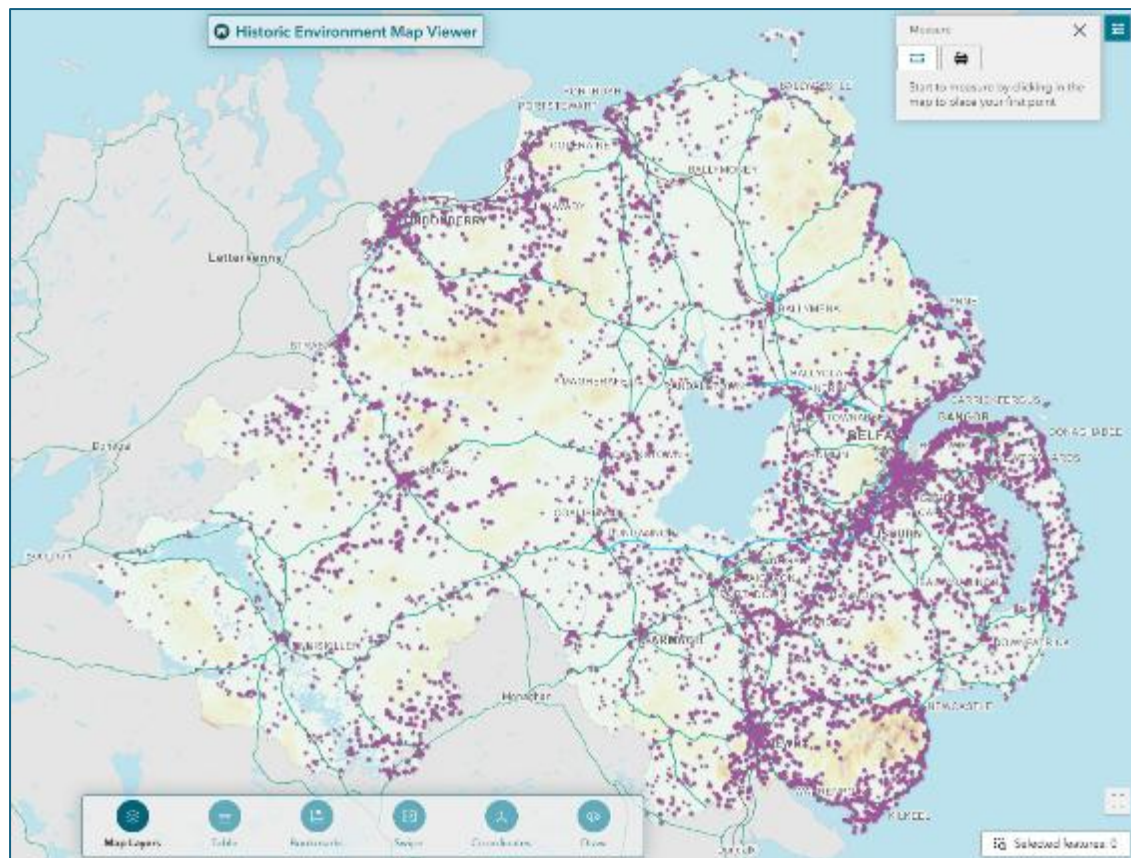


Fig 3 – Map showing example of scheduled zones in Derry~Londonderry – HERoNI HED Map Viewer (Crown Copyright HED). These scheduled areas are found across all of NI.⁵³

⁵³ [Archaeological sites and monuments | Department for Communities](#)

Fig 4 – Historic Buildings (Listed and Non-listed with a survey record are shown) – HERoNI HED Map Viewer (Crown Copyright)

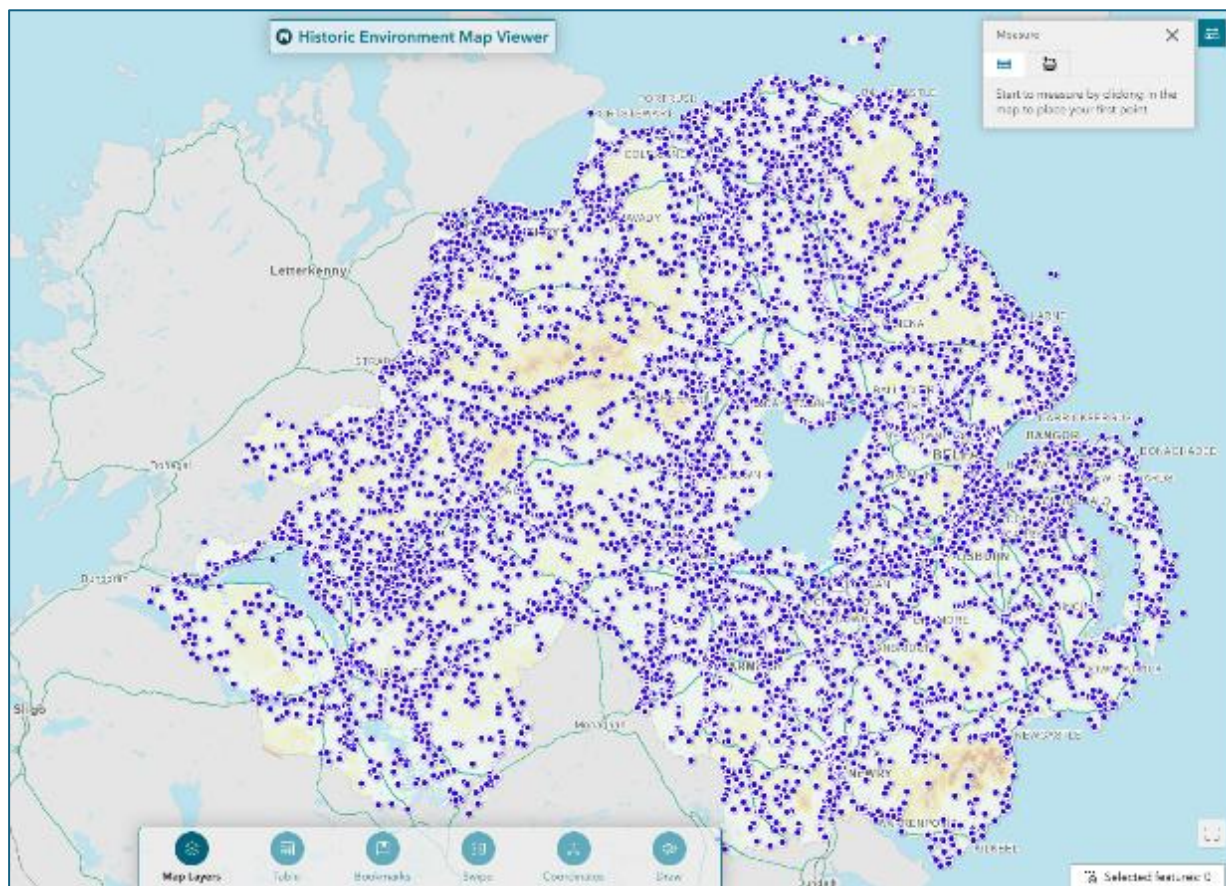
- 16,321 Historic buildings worthy of recording
- 9124 Listed Buildings⁵⁴



⁵⁴ [Listed Buildings | Department for Communities](#)

Fig 5 – Industrial Heritage Assets⁵⁵ – HERoNI HED Map Viewer (Crown Copyright)

- 16,648 sites on the Industrial Heritage Record (12,663 (24%) protected by formal designation)



⁵⁵ [Industrial Archaeology | Department for Communities](#)

Fig 6 - Map showing Northern Ireland's two World Heritage Sites – the Giant's Causeway (shown in pink) and Gracehill Moravian Settlement (shown in yellow)⁵⁶ - HERoNI HED Map Viewer (Crown Copyright)



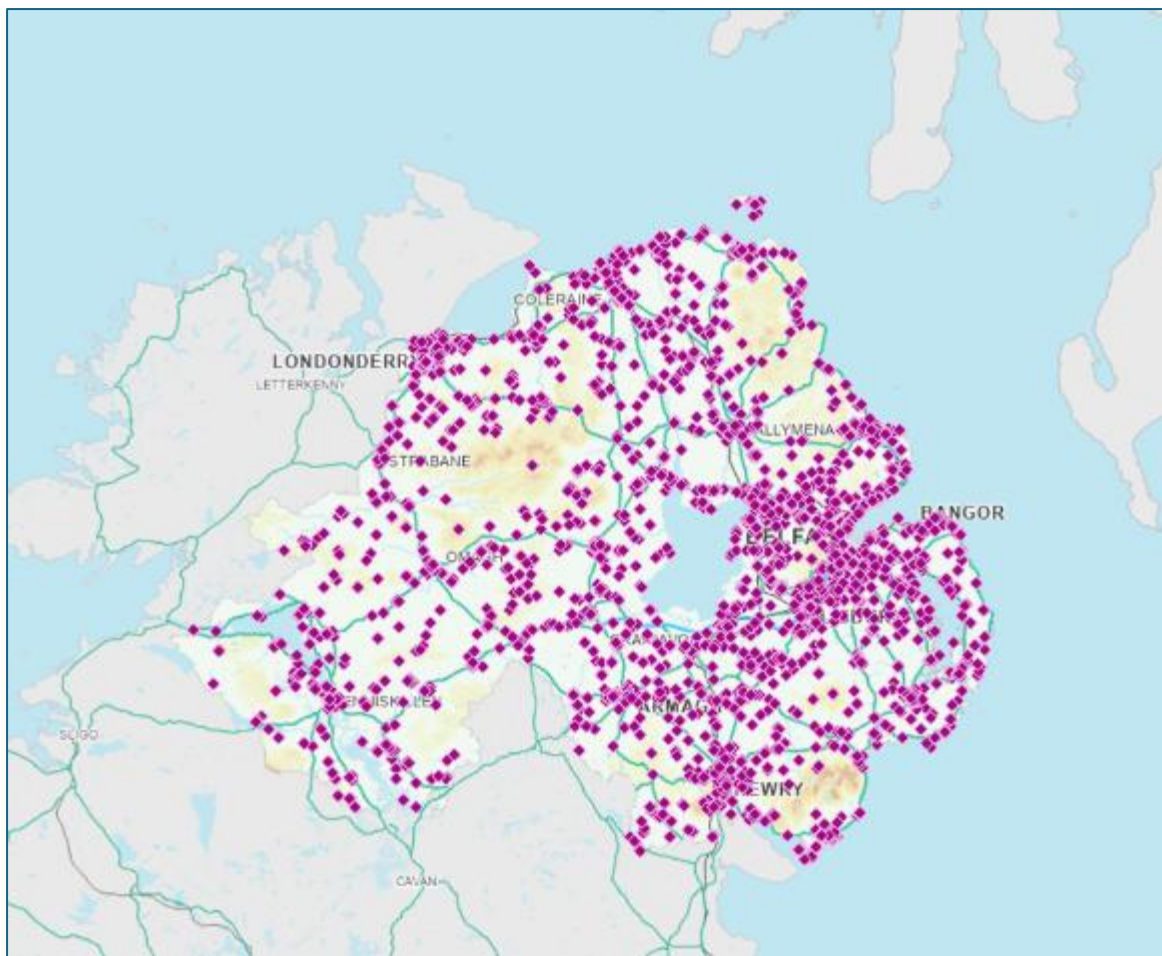
⁵⁶ [What is a World Heritage Site? | Gracehill's Journey to UNESCO Status](#)

Fig 7 – Map showing Defence Heritage⁵⁷ – HERoNI HED Map Viewer (Crown Copyright)



⁵⁷ Defence Heritage | Department for Communities

Fig 8 – Map showing Locations of Archaeological Excavations⁵⁸ in NI – HERoNI HED Map Viewer (Crown Copyright)



⁵⁸ [Archaeological excavation and survey | Department for Communities](#)

4.2.2 Material Assets - Environmental problems

Condition

- In the Survey on the Condition of Listed Buildings⁵⁹ carried out (2023/24), the overall condition of the majority of buildings appears to have suffered a 24.4% worsening in 20 years
- In the Thatch Survey carried out in 2023, Condition of one quarter of all thatched buildings was poor or very poor: V poor 17%, Poor 8%, Average 22%, Good 30%, v good 23%.
- ‘The Conservation Deficit⁶⁰’ – owners of buildings and monuments are aware of the importance of conserving heritage assets but not willing to incur private financial loss; assistance from government is required to encourage private owners to maintain listed buildings and scheduled monuments.
- There are over 500 listed buildings availing of the zero-rating for vacant heritage assets on the LPS database. Vacant listed buildings are presently exempt from payment of rates and there is no requirement currently to ensure that these buildings are maintained or insured.
- Heritage at Risk in Northern Ireland (HARNI)⁶¹ has doubled in the last decade. This encompasses a variety of issues including:
 - fire/vandalism (unsecure assets)
 - vacancy
 - threat of demolition due to a preference for new build
 - perception of funding and practical challenges with heritage projects
 - lack of investment in maintenance
 - Skills shortages for specialist maintenance
- The current (March 2025) figure of 1,148 buildings on the Heritage at Risk register (HARNI) is just over double the 527 structures recorded in 2018/19. This is a very stark figure. It is also a growing inventory of untapped potential.
- There are a further 33 historic monuments on the HARNI register (as of March 2025). (Around a further 60 may be eligible at Autumn 26).

⁵⁹ [Survey on the Condition of Listed Buildings | Department for Communities](#)

⁶⁰ Due to the higher than average cost of maintaining and repairing heritage assets, the cost incurred by owners to care for heritage assets often does not equal the return on that investment. Owners of buildings and monuments are aware of the importance of conserving heritage assets but not willing to incur private financial loss for non-monetary benefits or gains which are societal and not personal. The term ‘Conservation Deficit’ is used to describe this situation which is directly proportional to property values.

⁶¹ The majority of assets on this register are listed buildings. Some unlisted historic buildings of local interest (mainly in Conservation Areas) and some historic monuments are also included. [Heritage at Risk | Department for Communities](#)

- There are 1366 Central Government Owned Buildings, of which 5.7% are on the Heritage at Risk Register⁶².
- The Condition and Management Survey of the Archaeological Resource Northern Ireland (CAMSAR)⁶³ was conducted in 2004 and 2005, with some minor revision in 2007. This survey has not been repeated since 2007. There is potential that to update the findings could then been used as a 'benchmark' against which future analysis and management strategies could be monitored and then developed.

Key findings at the time of the survey were that:

- Only 7% of the archaeological sites and monuments in the sample were found to be 100% complete or substantially complete.
- Sites and monuments located on arable, improved grassland and within urban areas have the worst rates of survival and are in the poorest condition.
- Sites and monuments located on unimproved grassland, within woodland and within wetlands generally survive well and are preserved in a fair, good or excellent condition.
- Over 90% of the sites and monuments that have been specially protected through State Care, Scheduling, or Agri-environment agreement can be shown to have survived well.
- It was demonstrated that uncontrolled new-built development and certain agricultural activities, particularly heavy grazing and the practice of improving grassland, are the most destructive factors affecting the archaeological resource in Northern Ireland.

⁶² [The Protocol for the Care of the Government Estate](#)

⁶³ [CAMSAR_Report.pdf](#)

Fig 9 HARNI (Heritage at Risk)⁶⁴ Northern Ireland – ‘at risk’ (yellow) and ‘saved’ (green) and ‘unlisted, demolished’ (red) are shown – HERoNI HED Map Viewer (Crown Copyright)



⁶⁴ [Heritage at Risk | Department for Communities](#)

Funding / Support

- Government funding for listed buildings and monuments fell sharply from £3–4m (2011–2015) to £0–320k (2016–2023) (HED), contributing to worsening neglect and a sense of areas “being left behind.” Limited annual budgets make capital projects difficult, leading to missed opportunities.
- The 2023 Culture, Arts and Heritage Taskforce Report⁶⁵ highlighted an ongoing funding crisis, with organisations “doing more with less.”
- A widespread conservation deficit⁶⁶ means that, outside affluent areas, repair and reuse of heritage assets is often not financially viable, especially following economic downturns.

Governance

- Heritage remains marginalised in high-level government investment planning and is absent from the Programme for Government, despite its potential to contribute to key outcomes.
- Although the UK has ratified multiple international conventions on protecting and enabling access to cultural heritage, Northern Ireland has never had a dedicated Historic Environment Policy, meaning obligations are only partially met.
- A policy framework is required to clarify how heritage management aligns with statutory duties, sustainable development, and wider social and economic goals.

Protection

- Listed buildings experienced an average of 4 fires per year (2018–2024) (HED) rising to 8 fires in 2025.
- Storage conditions for parts of Northern Ireland’s archaeological collection fall below standards required under the Valetta Convention, and survey work to maintain a complete record has largely paused.
- Heritage regulation is widely misunderstood; statutory consultations are often viewed as obstructive, reinforcing misconceptions that consents delay development.
- Reduced resources for surveying and designation mean assets are often identified only when applications for alteration or removal are made, causing further delays and negative perceptions.
- Enforcement of heritage legislation and planning policy is under-resourced, creating a fragmented and ineffective regulatory environment.

⁶⁵ [Investing in Creative Delivery – A report from the Culture, Arts & Heritage Strategy Taskforce | Department for Communities](#)

⁶⁶ Due to the higher than average cost of maintaining and repairing heritage assets, the cost incurred by owners to care for heritage assets often does not equal the return on that investment. Owners of buildings and monuments are aware of the importance of conserving heritage assets but not willing to incur private financial loss for non-monetary benefits or gains which are societal and not personal. The term ‘Conservation Deficit’ is used to describe this situation which is directly proportional to property values.

Local Places

- Although councils have the power to create local lists, none have done so.
- The number of heritage assets transferred through Community Asset Transfer (CAT) is not monitored. Funding to support community ownership is also less accessible in Northern Ireland and is under review.
- Falling congregation numbers mean more churches are likely to become redundant, increasing vacancy, dereliction, and the loss of important shared community spaces.
- Only four of eleven district councils have dedicated Heritage Development Officers, compared with full coverage in ROI, where councils also employ Conservation Officers, Vacant Homes Officers, and in-house architectural teams with conservation expertise. This integrated model—successful in places such as Waterford—demonstrates how local heritage expertise can strengthen decision-making, regeneration, and cross-departmental investment.
- Listing decisions are often contested at council level, and the listing process itself is not well understood outside central government. Listing should be treated as a distinct process focused on identifying special interest, while planning decisions (under the Planning Act (NI) 2011) determine changes of use.
- Many monuments, historic parks and gardens serve as focal points for community identity, yet decision-making over these local assets typically remains with central government.
- While all NI Government Departments employ Heritage Officers and report against the Protocol for the Care of the Government Estate, 5.7% of the Government historic estate is on the HARNI register (Jan 2026). Despite NI Executive recommendations in 2011, no council has adopted the Protocol’s reporting mechanism, though some apply its principles through Heritage Plans.

Skills, Capacity and Maintenance Challenges

- Survey results⁶⁷⁶⁸ show a significant shortage of skilled conservation labour in Northern Ireland: 56% of listed building owners report difficulty finding skilled builders, 67% cite the cost or availability of suitable contractors or materials as a barrier, and 21% find it difficult to source skilled labour; the same proportion applies to scheduled monument owners. These findings indicate a weak private market for heritage skills and a limited pool of conservation-skilled workers.
- Unlike England and Scotland, NI has no heritage skills strategy, no Heritage Sectoral Partnership (DfE), and no structured career pathways. Existing Sectoral Partnerships in NI lack heritage sub-groups, and the sector suffers from “dying trades,” too few Heritage Development

⁶⁷ [Listed Buildings Survey](#)

⁶⁸ [Market Failure Analysis of the Heritage Sector in Northern Ireland](#)

Officers, and limited project-leadership capacity. There is also insufficient data on the economic or social value contributed by heritage volunteers, and heritage is not referenced in the Programme for Government as contributing to a sustainable economy.

- The AREA Report (SIB)⁶⁹ highlighted structural barriers to adaptive re-use and called for reform of heritage frameworks to enable sensitive adaptation, noting that the sector remains under-resourced across all levels. Preventative maintenance—shown by Historic England⁷⁰, to reduce long-term repair costs by 15–20%—is hampered in NI by low funding availability, contributing to accelerating decline and wider market failure.
- Government Heritage Officers also report persistent maintenance budget shortfalls in the Protocol for the Care of the Government Historic Estate (2021, 2023).
- The condition of listed buildings has declined markedly over the past 20 years⁷¹, and monument owners face similar challenges. Surveys show owners understand the importance of heritage but are unable to absorb private financial loss, indicating the need for government support. A lack of accessible maintenance guidance is also noted.
- Within State Care, 20% of sites have significant condition issues; 47 of 186 are not publicly accessible, and several high-potential sites remain closed. Nearly a fifth require maintenance.
- The CITBNI (2018) report confirmed growing demand for traditional materials but widespread shortages of the skills required to use them. It identified gaps across trades, contractors, professionals, and clients, recommending increased grant support, accreditation requirements, and dedicating part of repair funding to skills development.
- Engagement for the HCC Programme reaffirmed widespread needs:
 - succession and maintenance skills across buildings, monuments, landscapes, graveyards and HPGs;
 - archaeological skills shortages;
 - absent heritage career pathways;
 - fundraising, project management, leadership, interpretation, digital skills, community project skills;
 - and future requirements for conservators, archivists, curators and interpreters.

⁶⁹ [AREA-Report-2024.pdf](#)

⁷⁰ [The Role of Maintenance and Repair in a Low Carbon Future | Heritage Counts | Historic England](#)

⁷¹ [Market failure in heritage | Department for Communities](#)

4.3 Part 3 – Places - HE Policy Impact

SEA topic	SEA Objective
Material assets	create places, spaces and buildings that work well, wear well and look well

4.3.1 Potential impact of HE Policy on Places

- Implementation of HE Policy is unlikely to generate significant negative effects on Northern Ireland’s material assets.
- The historic environment underpins much existing infrastructure—such as bridges, rail structures and canals—and conserving these assets **strengthens place-making, particularly where infrastructure faces increased climate-related inundation.**
- HE Policy can optimise the reuse of previously developed land, buildings and existing infrastructure.
- Heritage assets can be identified, protected and enhanced through Local Development Plans currently under preparation. HE Policy will act as a **material consideration in planning, shaping Local Development Plans, Community Plans and Heritage Plans** to promote regeneration through reuse, and to position heritage assets and landscapes as distinctive focal points for communities.
- **Well-maintained heritage assets support high-quality place-making**, while neglect undermines local character, wellbeing and community cohesion.
- The skills and traditional materials required to maintain and reuse historic assets **contribute to a sustainable economy**, offering opportunities to promote locally sourced, sustainable materials.
- Re-use of historic buildings and infrastructure **supports climate action, aligning with circular economy and zero-waste principles.**
- Plans should establish a positive strategy for **conserving and enjoying the historic environment**, including assets most at risk from neglect, decay or other threats, taking into account:
 - the desirability of **sustaining and enhancing the significance of heritage assets, and ensuring that future uses remain viable and conservation-led;**
 - the **social, cultural, economic and environmental benefits that arise from conserving the historic environment;**
 - the desirability of new development making a positive contribution to **local historic character and distinctiveness;** and
 - opportunities to draw on the historic environment to reinforce and **enhance the character and identity of a place.**

- Recent work to address town-centre vacancy and environmental challenges—such as Heritage Enabled Regeneration in Towns⁷²—highlights that:
 - Northern Ireland has higher town-centre vacancy rates than the GB average, yet retains a stronger mix of town-centre uses, making it well placed to **support town-centre living as a means of tackling dereliction and increasing footfall**.
 - Heritage-led regeneration can help **match existing buildings with current housing demand** and areas of housing stress.
 - The Living High Streets Craft Kit**⁷³ (MAG) encourages community-led, co-designed approaches to high-street renewal.
 - Heritage-enabled regeneration models, such as Main Street America⁷⁴ and proposals by Belfast Building Trust⁷⁵, demonstrate the value of **building on existing assets and working collaboratively with communities and local businesses to reinforce sense of place**.
- DfC supports **heritage-focused regeneration** across programmes such as **City Deals**, the **Small Settlements Scheme**, and emerging **Neighbourhood Community Partnerships**, where heritage is recognised not only for its intrinsic value but as a core driver of community identity and place-making.
- There is an opportunity to **meet housing need with vacant buildings**, including vacant and underused historic buildings and first floor ‘over the shop’ living spaces in high streets.
- HE Policy can provide strategic support for participatory and community-led heritage management, strengthening **local stewardship and resilience**.
- Initiatives such as the Village Catalyst Grant Scheme⁷⁶ and Townscape Heritage Initiatives⁷⁷ demonstrate how heritage assets can **catalyse social growth, economic development and regeneration**, aligning community needs with central and local government objectives.
- These programmes also establish frameworks for **professional support, helping to build skills and capacity within community groups**.
- DfC’s **Anti-Poverty Strategy** and **Housing Strategy** emphasise the **re-use of historic buildings to support belonging, community cohesion and sustainable housing supply**, recognising the contribution of heritage assets to **visual amenity and attractiveness**.
- DfC’s **Shaping Sustainable Places**⁷⁸ identifies heritage as a key lever for regeneration and place-based transformation.

⁷² [Heritage Enabled Regeneration in Towns | Department for Communities](#)

⁷³ [MAG Living High Streets - craft kit | Department for Communities](#)

⁷⁴ [Main Street America :: Home](#)

⁷⁵ [About us - BBT](#)

⁷⁶ [Village Catalyst Pilot case studies | Department for Communities](#)

⁷⁷ [Townscape Heritage Initiative evaluation | The National Lottery Heritage Fund](#)

⁷⁸ [Consultation on Shaping Sustainable Places | Department for Communities](#)

- The Department of Justice has highlighted opportunities to **re-skill former offenders and young people**⁷⁹, for example through grounds maintenance and conservation work in historic landscapes and sites.

4.3.2 Potential Negative Impacts and Mitigation – Places

- **Potential effect:** Increased desire to occupy and use historic assets could pose a threat to their significance through inappropriate development.
- **Mitigation:** Through SPPS, planning controls such as Listed Building, Scheduled Monument and Conservation Area Consent, Local Development Plans, and Heritage Plans, checks should be in place to control inappropriate development. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should be avoided or mitigated by robust policies and accessible, clear guidance.
- **Potential effect:** increased access to historic places may have a slight negative impact for example through increased traffic or footfall.
- **Mitigation:** This can be managed through development controls under the SPPS. The higher level of protection of the settings around heritage assets, provide a more stringent protection through development controls like Listed Building and Scheduled Monument consents, and the removal of permitted development rights associated with protected structures.
- **Potential effect:** demand for materials associated with conservation and restoration could have a negative effect on the environment
- **Mitigation:** the low carbon footprint of local indigenous materials, and the preferred approach of re-use and repair, often offsets any 'expenditure' when compared to new-build. This carbon calculation could become part of repair work specification; the exception to this is the use of hardwoods in conservation. Suggested mitigation may be to consider insisting that hardwoods come from a sustainable source. Schemes to re-use hardwoods such as Oak which have been felled through storm damage are already in place – for example Oak trees which fell on National Trust properties were used in the re-construction of the roof at Carrickfergus Castle. This potentially negative impact can be addressed through control of specification for repair projects, supported by policy. Conversely, demand for local materials could have a positive effect, e.g. the regenerative properties of materials used for repair, such as straw and wood (or hemp for insulation); and keeping existing quarries productive and viable rather than having to import stone.

⁷⁹ [Learning and skills | Department of Justice](#)

4.3.3 Likely Impact without HE Policy:

- Without HE Policy, opportunities to use the historic environment as a **resource for housing, regeneration and job creation**—including skills development in the heritage sector—may be lost.
- Without central policy support, the **maintenance and enhancement** of existing heritage assets to meet local needs (housing, business, community development) may not be prioritised in future planning strategies.
- Without a policy focus on **heritage skills**, the training and capacity needed to support sustainable development and a productive heritage economy may weaken further.
- Without HE Policy, continued **under-investment** is likely to accelerate the decline of the historic environment—raising energy demand in poorly maintained buildings and preventing the heritage sector from realising its wider economic, social and environmental benefits.
- Without HE Policy, and with few Heritage Plans or Heritage Officers in councils, the potential to create **well-designed, resilient and distinctive places** through the effective reuse of heritage assets may not be fully realised.

4.4 Part 4 - Suggested HE Policy Aims - Places

4.4.1 Policy Aim 1: Developing best practice to identify and safeguard our historic environment

Alternatives considered:	• Do nothing: Without targeted action, the historic environment would continue to decline. The 2025 Listed Building Condition Survey⁸⁰ showed a 24.4 percentage point deterioration over 20 years, with the rate of decline doubling between 2014–2024, while heritage buildings at risk have doubled since 2018⁸¹. This option would fail to meet the UK’s obligations under ratified international heritage conventions and would not prevent further deterioration of assets. • Rely on statutory, reactive management: Continuing “business as usual” would not address systemic issues. Between 2021 and 2023, 56 enforcement cases were referred to councils, but many did not progress. Councils rarely issue Urgent Works Notices or Buildings Preservation Notices, citing limited funding and expertise. Since 2015, councils have not routinely monitored or reported heritage enforcement activity. This approach would leave assets vulnerable. • Delegate full heritage responsibility to councils: Given current capacity constraints, limited specialist staff, and inconsistent enforcement, this option would be unable to deliver the level of protection required under international conventions. • Support councils to produce local Heritage Plans: While desirable, councils currently lack the resources and expertise to implement such plans effectively, and no reporting mechanism exists. On its own, this option would not fulfil national obligations or deliver consistent heritage protection.
Selection:	Policy Aim: Developing best practice to identify and safeguard our historic environment • A joint approach is required, combining central government leadership with local council support, investment, and clear reporting to ensure all elements of HE Policy work together effectively. • HE Policy will promote capacity-building, training and targeted funding to strengthen enforcement, improve compliance, and support best practice in heritage management.

⁸⁰ [Listed Buildings Survey](#)

⁸¹ The 2023/24 figure of 1,111 heritage assets on HARNI is just over double the 527 structures recorded in 2018/19.

	• A 10-year policy framework allows long-term, cumulative improvements to be made, enabling Northern Ireland to meet its international and legislative obligations and to reverse the decline in the historic environment through sustained, visible progress. • HE Policy will provide clear central leadership on the Northern Ireland Executive's approach to the historic environment, shaping future plans, strategies and the Programme for Government. While councils may continue to prepare local Heritage Plans, HE Policy will offer coherence, fill gaps and ensure consistent standards across all areas. • A single, NI-wide policy taken to public consultation provides an opportunity to gather a broad, representative understanding of public expectations and aspirations for heritage. • A long-term perspective is essential to realise and evidence the cumulative social, cultural and environmental benefits of HE Policy, including through future 5- and 10-year reviews. • Wider influencing factors—such as VAT, rates and fiscal incentives affecting vacancy and heritage at risk—require a robust, evidence-based policy platform to support long-term solutions. • Given public concerns about regulation, consideration may be given to future amendments to NI's heritage legislation to ensure it remains effective, proportionate and aligned with HE Policy objectives. • To ensure accountability, Government should publish regular heritage statistics, including measurable trends relating to Urgent Works Notices, BPNs, enforcement and other statutory obligations. • HE Policy will become a material consideration in planning, strengthening positive outcomes for the historic environment across the planning system.
Potential for Monitoring: HEADLINE METRICS	PROTECTION – PfG Wellbeing indicator - BRIGHTER FUTURES • Headline statistic: Number of designated heritage assets in NI as reported in the Northern Ireland Environmental Report - • NUMBER AND TREND (% annual increase or decrease) ○ Number of Scheduled Historic Monuments (DfC) ○ Number of listed buildings (DfC) ○ Number of Monuments in State Care (DfC) ○ Number of Conservation Areas (DfI)) ○ Number of protected wrecks (DfC) ○ Number of HPGs A* • Overall Condition of scheduled monuments (as reported for a selection between Field Monument Warden visits) - TREND (% increase or decrease good or very good between cycles of visits)

	Overall condition of Listed Buildings (as statistically recorded at 10 year intervals by DfC) TREND (% 10 year increase or decrease good or very good)
Potential for Monitoring: SUPPORTING METRICS	PROTECTION - Number of Monuments (DfC) - Numbers of BPNs per council per year (DfC) CONDITION - New Stat - Overall Condition of thatched buildings in Northern Ireland. (Thatch condition survey) - TREND (% 10yr monitoring increase or decrease good or very good) (DfC) - Total number of scheduled monuments on HARNI register (DfC) - Number of LB entries on the Heritage at Risk register (UAH/DfC) - Total number of unlisted buildings on HARNI (UAH/DfC) - Amount invested in maintenance annually Historic Environment Fund (DfC) - FIGURE AND TREND - New Stat - Number of Vacant Listed Buildings on High Streets (from HARNI) - New Stat - No. Local Listings - New Stat - Amount of rates missed through vacant listed buildings SAFEGUARDING - Number of fires in Listed Buildings - NUMBER and TREND - Nos demolitions in CAs (DfI) % CAs with article 4s (DfI) - State Care Incidents DfC HED records - NUMBER and TREND (Dilapidation) Number of Urgent Works Notices served by Councils - NUMBER and TREND - Number of active Enforcement cases - Monuments - NUMBER and TREND - Number of active Enforcement cases - Listed Buildings - NUMBER and TREND - Number of active Enforcement cases - Conservation Areas - NUMBER and TREND - Statutory Planning Consultations DfC HED records (DfI)- NUMBER AND TREND (% on time) - Non Statutory Planning Consultations DfC HED records - % on time - NUMBER and TREND - Listed Building Consent Consultations DfC HED records - % on time - NUMBER and TREND - EIA Consultations DfC HED records % on time - NUMBER and TREND - Marine Licencing Consultations DAERA MFD records - NUMBER and TREND

	- Scheduled Monument Consent Applications DfC HED records (as published in NIESR) - NUMBER and TREND - Number of Archaeological Licences Issued (DfC HED records NIESR) - NUMBER and TREND - Number of HED Agri- Environment and Forestry Consultations (HED annual statistical return spreadsheet) - NUMBER and TREND		
Effects on SEA Objectives:	Material Asset	++	Best-practice safeguarding significantly improves condition and sustainable use of historic material assets
	Landscapes / Seascapes	++	Protecting heritage assets strongly enhances landscape distinctiveness and scenic value.
	Population / Health	++	Engagement with historic environments supports wellbeing; long-term protection benefits communities and individuals.
	Climatic Factors	++	Retention and reuse of buildings, peatland recovery and protected settings support climate mitigation and resilience.
	Biodiversity, Flora, Fauna	++	Protecting heritage landscapes supports habitats, biodiversity and natural systems.
	Air, Soil and Water	+	Safeguarding buildings and settings maintains environmental quality and avoids negative impacts.
	Cultural Heritage	++	Long-term protection strongly benefits cultural heritage, especially assets at risk from neglect or climate change.

4.4.2 Policy Aim 2: Developing a highly skilled workforce to conserve and sustainably develop our historic environment

Alternatives:	• Do nothing: Without action to develop heritage skills, NI's historic environment will continue to deteriorate. The 2025 Listed Building Condition Survey⁸² showed a 24.4 percentage point decline over 20 years, with the rate of deterioration doubling in the last decade, and vacant heritage buildings doubling since 2018⁸³. This option would fail to meet the Government's obligations under international conventions and would not prevent continued decline. • Focus solely on heritage apprenticeships: While apprenticeships are important, they cannot address the full range of skills needed. Evidence from CITBNI (2018) and the Heritage Stakeholder Group (2023) shows that NI requires a broader skills ecosystem, including: ○ clear standards and specifications ○ social clauses requiring heritage skills training ○ timelines for contractors to employ fully qualified staff ○ recognition that many heritage skills are also needed across the wider culture and arts sector (e.g., specialist joinery for film sets) ○ stronger advocacy and communication with developers ○ development of non-construction skills, such as conservation, interpretation and project management and also the skills needed to manage heritage assets. ○ A narrow focus on apprenticeships would not meet the sector's wider needs or fulfil Government obligations under international conventions.
Selection:	Policy Aim: Developing a highly skilled workforce to conserve and sustainably develop our historic environment • A skilled heritage workforce is essential to discover, maintain, conserve and manage the historic environment. A strong skills base can create long-term career pathways, support apprenticeships⁸⁴ leading to recognised qualifications, and attract talent into a growing sector. Many heritage skills are also highly transferrable across the wider construction industry⁸⁵, contributing to a more sustainable economy by "stimulating demand, stimulating the skills need and thus stimulating training need."

⁸² [Listed Buildings Survey](#)

⁸³ The 2023/24 figure of 1,111 heritage assets on HARNI is just over double the 527 structures recorded in 2018/19.

⁸⁴ [Skills Barometer 2021 update | Department for the Economy](#)

⁸⁵ Construction Survey published by the Construction Employers Federation (CEF) – the top four priorities:

- Attracting new entrants by promoting construction careers in schools and communities

	- Focusing on a highly skilled workforce requires a long-term, layered plan to build a sustainable heritage skills ecosystem. Developing these skills supports the historic environment, strengthens lifelong learning, and contributes to economic growth and employment. In turn, enhanced skills will support cultural heritage, the condition of material assets, and the creation of high-quality places, improving wellbeing across Northern Ireland. <i>A circular economy emphasises the use of renewable, non-toxic, non-polluting and biodegradable materials with the least life-cycle impacts. These key features of a circular economy resonate with the guiding principles of heritage conservation.⁸⁶</i>
Potential for Monitoring: HEADLINE METRICS	SUSTAINABLE ECONOMY - SKILLS AND EMPLOYMENT New Stat - The number of people employed in the heritage sector in Northern Ireland - NUMBER AND TREND (% annual increase or decrease) (DfE)
Potential for Monitoring: SUPPORTING METRICS	EMPLOYMENT - New Stat -Number of construction sector jobs associated with heritage (CITBNI/DfE Heritage Sectoral Partnership) - New Stat -No.s conservators, museums, archive, etc - (Defined by agreement - Heritage Sectoral Partnership) - New Stat -Number of thatchers active in NI (DfC) - No.s registered heritage guides in NI – (Tourism NI) - New Stat ..Number of Heritage volunteers – VCU – research joint between HED and VCU - and contribution to economy SKILLS - New Stat -The number of people newly qualified in the Heritage Sector– as a figure and trend (CITBNI/DfE Heritage Sectoral Partnership) - NUMBER and TREND - New Stat -Number of heritage skills apprentices in NI (CITBNI/DfE Heritage Sectoral Partnership) - NUMBER and TREND CONSERVATION QUALIFICATION - New Stat - No.s in NI with conservation accreditation - RSUA Conservation Architects, IHBC, CAMS?, - NUMBER and TREND EVIDENCE OF SKILLS - New Stat - No.s repeat LBCs and SMC applications - NUMBER and TREND

- Identifying skills needs and providing specific training tailored to the industry
- Development of entry-level skills programmes
- Enhancing the understanding of routes into the construction industry

⁸⁶ [Heritage in a Circular Economy | Heritage Counts | Historic England](#)

Effects on SEA Objectives:	Material Assets	++	Developing essential heritage skills will significantly improve the preservation of material assets across NI and support sustainable demand for the materials needed to maintain them.
	Landscapes / Seascapes	++	A skilled heritage sector and lifelong learning ecosystem will strongly enhance the conservation and quality of historic landscapes and seascapes.
	Population / Health	++	Heritage skills create employment and learning opportunities. Strengthening the sector improves life chances, wellbeing and community resilience as asset condition improves
	Climatic Factors	+	Specialist skills are increasingly needed to adapt heritage assets to climate impacts and improve energy efficiency. These cross-sectoral skills support climate resilience beyond the heritage sector.
	Biodiversity, Flora, Fauna	+	Specialist skills—such as soft-capping of monuments—can help manage heritage assets in ways that support biodiversity and habitat protection.
	Air, Soil and Water	0	Developing heritage skills is unlikely to significantly affect air, soil or water, except in specific areas such as marine heritage skills.
	Cultural Heritage	++	Building a skilled heritage workforce will have a major positive effect on cultural heritage, improving conservation, survey, interpretation and long-term stewardship.

4.4.3 Policy Aim 3: Investing in the capacity of owners, volunteers and organisations to care for and use local historic assets to meet their needs

Alternatives:	• Do Nothing: Without government leadership, communities would lack coordinated support to use their heritage assets. This option offers no mechanism to improve collaboration between central and local government, the voluntary sector, and communities. Due to the existing conservation deficit⁸⁷, private development is often not viable and does not meet community needs; therefore, deterioration and underuse would continue. • Rely on external bodies (e.g. National Lottery): While the National Lottery Heritage Fund has strong expertise and can integrate arts and nature into community projects, its interventions are time-bound. Past initiatives such as THIs (Townscape Heritage initiatives) demonstrate the limitations of short-term, project-based funding. Longer-term strategic direction is required to deliver sustained community benefit
Selection:	Policy Aim: Investing in the capacity of owners, volunteers and organisations to care for and use local historic assets to meet their needs • HE Policy can encourage long-term, community-led use of heritage assets, supporting permanent and sustainable benefits for local areas. Initiatives such as <i>Adopting a Monument</i>⁸⁸ illustrate how communities can take an active role in the conservation, interpretation and stewardship of local sites, including State Care monuments. Through policy direction, Government can empower communities to collaborate, participate in community planning, support local tourism and business, strengthen identity, and gain new skills. • The renewal of Community Plans in 2030 presents an opportunity for HE Policy to act as a material consideration, aligning local priorities with heritage-led community development. • Evidence from <i>Heritage Enabled Regeneration in Towns</i> highlights that heritage-led regeneration reinforces a town's unique identity, retains existing buildings, supports environmental sustainability and works <i>with</i> communities—unlike external, imposed development that often fails to meet local needs. • HE Policy will serve as a material consideration in planning, supporting Local Council Planning Committees in protecting and making effective use of heritage assets, thereby delivering positive outcomes for people and places.

⁸⁷ [Market failure in heritage | Department for Communities](#)

⁸⁸ [Adopt a Monument | The Heritage Council](#)

Potential for Monitoring: HEADLINE METRICS	- Existing Stat - Total number of heritage assets on HAR saved – (places of deprivation, rural or urban places) - Proposed Stat - Number of Heritage Plans in Councils (NUMBER AND % OF ALL COUNCILS) - Could this be added to/ Covered by the aim ‘Investing in the care and re-use of our historic environment as a resource to drive regeneration’		
Potential for Monitoring: SUPPORTING METRICS	- Existing Stat - Number of Heritage Officers in Councils (NUMBER AND % OF ALL COUNCILS) - Number of councils with Accredited Conservation Planners - New Stat - Number of Councils signed to Protocol for the Care of the Government estate (DfC) - New Stat - Number of faith heritage sites no longer in use (potential community assets) - Harnessing Heritage (AHF) – number of complete/live projects as a trend, geographical spread/areas of deprivation		
Effects on SEA Objectives:	Material Assets	++	Enabling communities to use and care for local heritage can help reverse decline, improve condition, and create high-quality places and spaces.
	Landscapes / Seascapes	++	Caring for and using cultural heritage enhances landscape and seascape character, especially in parks, gardens, countryside, harbours and coastal settings.
	Population / Health	++	Empowering communities to care for their places strengthens pride, autonomy and wellbeing. Quality places support better life chances and healthier communities.
	Climatic Factors	+	Re-use and repair of historic buildings reduce waste and whole-life carbon, while ongoing care improves resilience to climate impacts.
	Biodiversity, Flora, Fauna	+	Planned regeneration of historic places often protects surrounding natural spaces, supporting habitats and biodiversity as a positive side benefit.
	Air, Soil and water	?	Increased access may affect air, soil or water, but impacts are uncertain and can be mitigated through development controls such as the SPPS.
	Cultural Heritage	++	Supporting communities to care for and interpret heritage strengthens identity, cohesion and pride in place, delivering major benefits for cultural heritage.

4.4.4 Policy Aim 4: Empowering communities to adapt, enhance and re-use historic assets, drive regeneration and shape distinctive places

Alternatives:	• Short-timescale capital projects: Short-term funding delivers short-term, largely cosmetic improvements (e.g. shopfront painting) that do not address underlying issues such as roof failures or vegetation damage. These interventions tend to mask deeper problems rather than reverse long-term decline. • Medium-timescale capital projects: Heritage Lottery Townscape Heritage Initiatives (THIs) successfully delivered regeneration through capital works, skills, education and investment in towns such as Lurgan, Armagh and Carrickfergus. However, as a finite funding stream, THIs have ended, risking the loss of the skills, networks and momentum they created—an opportunity missed to maintain long-term regeneration benefits.
Selection:	Policy Aim: Empowering communities to adapt, enhance and re-use historic assets, drive regeneration and shape distinctive places • A 10-year, cross-government focus on using heritage to drive regeneration can support long-term, sustainable growth, including in deprived areas. Projects such as the Village Catalyst (e.g., Caledon Wool Store⁸⁹) show how heritage investment can stimulate wider regeneration beyond an individual site. • Sustainable regeneration often means caring for and re-using existing assets, making them focal points for community identity and activity. Many heritage assets—buildings, monuments, parks, gardens, pumps and traditional town-centre features—already sit at the heart of communities. Regeneration through reuse is often described as “turning a light back on.” • A combined “carrot and stick” approach—pairing support and funding with clear enforcement powers—can help councils drive good practice. Examples such as Lisburn & Castlereagh’s use of Urgent Works Notices alongside investment in shopfronts and building fabric demonstrate the value of long-term commitment to place. • <i>Heritage Enabled Regeneration in Towns</i> highlights the range of organisations involved in successful regeneration—local authorities, charities, social enterprises, private developers, Building Preservation Trusts and community-led partnerships. A consistent theme is the need for coordinated empowered collaboration at government and local levels.

⁸⁹ [The Woolstore | The Architectural Heritage Fund](#)

	• The same research concludes that heritage-led regeneration is most effective when delivered as part of a wider, place-based strategy, with multiple benefits: • Community/social: strengthened civic pride, shared spaces for daily needs, enhanced cohesion, increased town-centre use, greater local leadership capacity. • Economic: new uses (e.g., housing, workplaces) that generate footfall, encourage private investment and support local economies. • Environmental: reuse of existing buildings retains embodied carbon and can reduce car dependency through increased town-centre living. • Heritage-led regeneration has consistently created quality places and strengthened “pride of place,” leading to additional private investment. A future in which heritage-enabled development is the norm would mean finding viable new uses for existing assets and making it easier to deliver them⁹⁰. • With over 95% of Listed Building Consent applications approved⁹¹ in Northern Ireland, the existing planning system demonstrates that historic building consents generally <i>facilitate</i> rather than obstruct progress. • HE Policy will act as a material consideration in planning, strengthening positive outcomes for heritage, people and places.
Potential for Monitoring: HEADLINE METRICS	COMMUNITY WEALTH/PARTNERING WITH COMMUNITIES • New Stat - Number of CATs which are heritage buildings re-used per year NUMBER AND TREND (% annual increase or decrease) • Number of HARNI saves per year as a figure and trend for COMMUNITY USE– (DfC reported in EIP?) NUMBER AND TREND • New Stat - Number of community organisations in NI that are housed within or manage a historic building or monument. REGENERATION • Total number of heritage assets on HAR saved - NUMBER AND TREND (% annual increase or decrease) • Total number of heritage assets on HAR saved in areas of deprivation - NUMBER AND TREND (% annual increase or decrease) • Total number of heritage assets on HAR saved in rural vs urban areas - NUMBER AND TREND (% annual increase or decrease) Number of Government Owned HARNI saves per year as a figure and trend – (DfC reported in EIP?) NUMBER AND TREND

⁹⁰ DfC Placemaking group engagement session

⁹¹ [NI HERITAGE DELIVERS 2026 CASE STUDIES AND STATISTICS ON HOW HERITAGE BENEFITS NORTHERN IRELAND | Heritage Delivers](#)

Potential for Monitoring: SUPPORTING METRICS	• Total amount of lottery funding for heritage projects in areas of deprivation • Total amount of funding in Sustainable Settlements towards heritage led regeneration • Total amount of funding in City Deals towards heritage led regeneration • total %/amount/trend in DfC Regen budget towards heritage led regeneration • total %/amount/trend in DfC on Neighbourhood Community Partnerships		
Effects on SEA Objectives:	Material Assets	++	The historic environment can drive sustainable regeneration. HE Policy will support the reuse and enhancement of existing assets, helping to reverse decline and strengthen the quality and condition of material assets.
	Landscapes / Seascapes	++	Heritage-led regeneration benefits landscapes and seascapes, especially where cultural heritage forms part of coastal, rural or intertidal areas. Caring for existing assets reinforces local distinctiveness and reduces the need for carbon-heavy new development.
	Population / Health	++	Improvements to the condition and use of historic places enhance quality of place. Living in well-designed, cared-for environments supports wellbeing, pride in place and better life chances.
	Climatic Factors	+	Reusing existing buildings reduces whole-life carbon, supports adaptation to climate impacts and ensures conditions are monitored over time. Regeneration therefore contributes positively to climate mitigation and resilience.
	Biodiversity, Flora, Fauna	+	Regeneration that protects and manages the settings of historic places often benefits natural spaces, helping safeguard habitats around landscapes, monuments, gardens, graveyards and estates.
	Air, Water and Soil	?	Regeneration may increase access and traffic to historic places, but potential effects are uncertain and can be mitigated through planning controls such as the SPPS.
	Cultural Heritage	++	Heritage-enabled regeneration strongly supports cultural heritage by reusing assets, reinforcing identity and embedding cultural value within regenerated places.

4.4.5 Policy Aim (discounted): Maximising the role of councils, community and voluntary organisations in the promotion, protection and enjoyment of their heritage assets [To be amalgamated into alternative aim – Empowering communities]

Alternatives:	• Do-nothing – Northern Ireland does not have comparable Community Ownership legislation or Funding to other parts of the UK, known collectively as ‘community wealth building’. Although there is clear local appetite to reverse decline and make better use of community heritage assets—as seen through the Village Catalyst Scheme—only a small number of flagship projects have been possible, and current funding and resourcing remain limited. A “do-nothing” approach would fail to provide the strategic direction needed to integrate the protection and use of the historic environment across planning, development, tourism and local policy. As a result, opportunities to create a coordinated, place-based approach with multiple long-term benefits to communities would be lost.
Selection:	Policy Aim: Maximising the role of councils, community and voluntary organisations in the promotion, protection and enjoyment of their heritage assets • Heritage strengthens people’s connection to place and can support local economic prosperity^{92,93}. A high-level HE Policy can enable this by providing opportunities, training and support for community partners directly involved in the advocacy, investment and delivery⁹⁴ of heritage activity. • Local-level projects will be central to heritage-enabled regeneration. An overarching HE Policy can reinforce recognition of the value of heritage assets and support their owners within communities. • In places where historic buildings anchor high streets and neighbourhoods, mechanisms such as Community Asset Transfer⁹⁵ can empower communities to take control of underused or neglected structures, reversing decline and restoring their function as community assets. • Greater public involvement in policy-making, priority-setting and funding decisions can strengthen community ownership and capacity through community planning. • Supporting community networks and heritage owners through free-access initiatives—such as European Heritage Open Days—can widen engagement, awareness and celebration of local heritage. • Cross-sector collaboration between arts, libraries, museums and cultural organisations can further enhance opportunities for people to enjoy, use and value historic places through events, exhibitions and cultural programming.

⁹² [The Value of High Street Heritage Action Zones | Historic England](#)

⁹³ [Cultural Heritage, Creativity and the Creative Economy | Heritage Counts | Historic England](#)

⁹⁴ [Walled City Partnership Walled City Partnership, Derry, Historic Walls, Londonderry](#)

⁹⁵ [Community Asset Transfer - Development Trusts NI](#)

	• A national marketing strategy for Northern Ireland's heritage would help raise public understanding of the value of heritage, its contribution to pride in place, wellbeing, the economy and local identity. This aim could be be amalgamated into: • Investing in local capacity to care for and re-use historic assets, drive regeneration and shape distinctive places • Empowering communities, volunteers and organisations to use local historic assets to meet their needs And • Reaching out: supporting heritage education and activity for inspiration, learning and enjoyment.		
Potential for Monitoring: HEADLINE METRICS	N/A - see above		
Potential for Monitoring: SUPPORTING METRICS	N/A - see above		
Effects on SEA Objectives:	Material Assets	++	Enabling councils, community groups and volunteers to promote, protect and use heritage assets can significantly improve the condition of material assets. Support for reuse, maintenance and sustainable materials can help reverse decline, create high-quality places and support climate-friendly reuse of existing infrastructure.
	Landscapes / Seascapes	++	Community-led stewardship of heritage assets can strongly enhance landscape and seascape character, safeguarding distinctiveness and scenic value.
	Population / Health	++	Greater community involvement in caring for local heritage improves access, strengthens autonomy and pride in place, and enhances wellbeing through better-quality living and working environments.
	Climatic Factors	+	Supporting communities to reuse heritage assets reduces CO ₂ emissions by avoiding new construction and encouraging adaptation measures that respond to climate change.
	Biodiversity, Flora, Fauna	+	Caring for heritage places often leads to improved stewardship of surrounding natural spaces—gardens, monuments, graveyards and estates—helping to protect habitats and biodiversity.
	Air, Soil and water	?	Increased access to heritage sites could raise traffic or visitor pressures, but impacts are uncertain and can be mitigated through planning controls (e.g. SPPS).
	Cultural Heritage	++	Strengthening community, voluntary and council roles enhances the safeguarding of designated and undesignated heritage, including assets at risk, while deepening local identity and supporting identity

Natural Places

In this section, HE Policy is considered against Landscapes and Seascapes, Biodiversity, Flora & Fauna and Air, Water and Soil. These topics relate in a connected way to the historic environment, and therefore HE Policy Impact and objective(s) relating to the Natural Environment are brought together in Parts 3 and 4.

4.5 Landscapes and Seascapes

4.6 Part 1 – Landscapes and Seascapes – Relationship with other plans, strategies and programmes

SEA Topic – Landscapes and Seascapes

Protection

Relevant legislation:

- **Nature conservation and Amenity Lands Order (NI) 1985**
- **The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017**
- **Planning Policy Statements (PPS – in particular PPS2 and PPS18). It should be noted that the PPS's will be superseded by Local Development Plans when they are adopted.**

and

- **Planning Act (NI) 2011**
- **Historic Monuments and Archaeological Objects (Northern Ireland) Order 1995**
- **Protection of Military Remains Act 1986**
- **Protection of Wrecks Act, 1973**
- **Merchant Shipping Act 1995**
- **The Fisheries Act (Northern Ireland) 1966**
- **Treasure Act 1996**
- **UK Marine and Coastal Access Act 2009**
- **The Marine Act (NI) 2013**

International Convention, declaration or charter	Legislative basis, environmental objectives or requirements of the plan or programme	How objectives and requirements of other plans or programmes might be taken on board in Historic Environment Policy (HE Policy) or how HE Policy might impact other plans, policies or programmes	Impacts on HE Policy	HE Policy may impact outcomes
The European Landscape Convention (Florence, 2000)⁹⁶	This convention is legally binding. The UK ratified this Convention in 2000. The Convention ‘ <i>requires us to recognize the important value of landscapes and to reconcile commercial considerations with the right to well-being, health, aesthetics and beauty. The convention establishes the general legal principles which should serve as a basis for adopting national landscape policies and establishing international cooperation in such matters. It defines a general framework for preserving and ensuring the quality of the landscape. The aim is to preserve the quality of life and well-being of Europeans with due regard for their natural and cultural heritage.</i> ’	Historic Environment Policy will support the aspiration set out in the Convention to consider natural and cultural heritage together, supporting their mutual protection within landscapes for the benefit and enjoyment of everyone.	✓	
The European Landscape Convention (ELC)⁹⁷ – as applied in both Northern Ireland and Republic of Ireland⁹⁸ as the National Landscape	The ELC is the first international treaty dedicated to the protection, management and planning of all landscapes in Europe. ‘Signed by the UK government in 2006 and introduced in March 2007, the ELC provides a people-centred and forward-looking way to reconcile management of the environment with the social and economic challenges of the future, and aims to help people reconnect with place.’	The definition of Landscape as area(s) shaped by people aligns with the definition of the historic environment which incorporates ‘ <i>All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and deliberately planted or managed flora.</i> ’ Therefore the objectives set out in the ELC will align with HE Policy to preserve, protect and enhance the historic environment, in turn having a positive and inter-linked impact on landscapes.	✓	

⁹⁶ The European Landscape Convention (Florence, 2000)

⁹⁷ [The European Landscape Convention \(ELC\) - Landscape Institute](#)

⁹⁸ [N Landscape Strategy ENGLISH - inside.indd](#)

Strategy (2015-2025)⁹⁹	<i>The ELC contains 18 articles which, collectively, promote landscape protection, management and planning and organising European cooperation on landscape issues.</i> <i>Article 1 defines the terms used in the ELC. These include:</i> • <i>“Landscape” – an area perceived by people whose character is the result of the action and interaction of natural and/or human factors.</i> • <i>“Landscape policy” – an expression by the competent public authorities of general principles, strategies and guidelines that permit the taking of specific measures aimed at the protection, management and planning of landscapes.</i> • <i>“Landscape protection” – actions to conserve and maintain the significant or characteristic features of a landscape, justified by its heritage value derived from its natural configuration and/or from human activity.</i> • <i>“Landscape management” – action, from a perspective of sustainable development, to ensure the regular upkeep of a landscape, so as to guide and harmonise changes which are brought about by social, economic and environmental processes.</i> • <i>“Landscape planning” – strong forward-looking action to enhance, restore or create landscapes.</i>	Landscapes are shared and intervisible across borders; HE Policy will therefore also have a positive impact and benefit from the positive impacts of the Policies set out in the Republic of Ireland to support the ELC.		
--	--	---	--	--

⁹⁹ [National Landscape Strategy](#)

	The Republic of Ireland signed and ratified the Council of Europe's European Landscape Convention (ELC) which came into effect on 1 March 2004. It obliges Ireland to implement policy changes and objectives concerning the management, protection and planning of the landscape in ROI.			
Other plan/programme or strategy	Legislative basis, environmental objectives or requirements of the plan or programme	How objectives and requirements of other plans or programmes might be taken on board in Historic Environment Policy (HE Policy) or how HE Policy might impact other plans, policies or programmes	Impacts on HE Policy	HE Policy may impact outcomes
Strategic Planning Policy Statement (SPPS)¹⁰⁰	(SPPS) <i>policy objectives for development in the countryside are to:</i> • <i>manage growth to achieve appropriate and sustainable patterns of development which supports a vibrant rural community;</i> • <i>conserve the landscape and natural resources of the rural area and to protect it from excessive, inappropriate or obtrusive development and from the actual or potential effects of pollution;</i> • <i>facilitate development which contributes to a sustainable rural economy; and</i> • <i>promote high standards in the design, siting and landscaping of development.</i>	Historic Environment Policy will align with and expand on the Strategic Planning Policy Statement objectives. HE Policy will provide high level advice on Government's attitude to the historic environment which will influence the implementation of the SPPS (SPPS is based on protective legislation, however, it is guided by policy in practice.) HE Policy will contribute to the objectives to conserve landscape and natural resources, protecting it from inappropriate or obtrusive development. It will support development which contributes to a sustainable economy, and promotes high standards in design, siting and landscaping of development associated with heritage places and assets – therefore aligning with the SPPS aims to conserve, protect and enhance landscapes.	✓	✓

¹⁰⁰ [Strategic Planning Policy Statement for Northern Ireland \(SPPS\)](#)

Northern Ireland Environmental Improvement Plan (EIP)¹⁰¹	The preparation and publication of an Environmental Improvement Plan (EIP) is a statutory duty placed upon the Department of Agriculture, Environment and Rural Affairs (DAERA) by Schedule 2 to the Environment Act 2021 (the Act), which came into force in July 2022 following Assembly approval. Northern Ireland's EIP forms the basis for a coherent and effective set of interventions that can collectively deliver improvements in the quality of the environment. The strategic objectives of the EIP include: • A <u>healthy and accessible environment and landscapes</u> everyone can connect with and enjoy;	An action of the Northern Ireland Environmental Improvement Plan is to 'Develop and implement a Culture Arts and Heritage Strategy which embeds environmental outcomes.' Historic Environment Policy is part of what was known as the 'Culture Arts and Heritage Strategy', now referred to as the 'Heritage, Culture and Creativity Programme'. HE Policy will augment the EIP: through management and appreciation of the historic environment HE Policy supports to the EIP objectives to achieve healthy and accessible environment and landscapes everyone can connect with and enjoy which include cared for, accessible and better understood heritage assets.		
Enriched Landscapes – Landscapes NI	Landscapes NI is the network of all the landscape management organisations in Northern Ireland. The Vision for the network is "Cherished landscapes benefiting people and nature in Northern Ireland". To achieve this vision we have a mission to "work together to promote landscapes and associated policy and practice in Northern Ireland." Enriched Landscapes is a manifesto, which depicts a 'call to ensure the protection of landscape character and enhancement of these wonderful natural assets, for the benefit of nature, people and planet.' The organisation's goal is to ensure that Northern Ireland's landscapes '<i>..remain a source of natural beauty and inspiration ...[and] remain deeply rooted in our collective psyche and sense of place.</i>'	HE Policy aligns with the objectives of enriched landscapes, supporting the contribution that the historic environment makes to landscapes, '<i>our collective psyche and sense of place.</i>'		

¹⁰¹ [Environmental Improvement Plan for Northern Ireland | Department of Agriculture, Environment and Rural Affairs](#)

UK High Level Marine Objectives 2008 and UK Marine Policy Statement (MPS)¹⁰² and the Marine Plan for Northern Ireland (once adopted)¹⁰³	<i>‘The UK Marine Policy Statement (MPS) is the framework for preparing Marine Plans and taking decisions affecting the marine environment.’</i> <i>‘The Marine Plan for Northern Ireland will inform and guide the regulation, management, use and protection of our marine area. It is a single document made up of two plans, one for the inshore region and one for the offshore region.’</i> The objectives within these frameworks include ‘To promote the preservation and enjoyment of marine related heritage assets’.	Historic Environment Policy aims will align with the common objectives within these three directives, supporting Marine Policy to protect underwater and inshore heritage in Northern Ireland.	✓	✓
Towards an Integrated Coastal Zone Management Strategy for Northern Ireland 2006-2026¹⁰⁴ (DAERA)	<i>‘This strategy is intended to set out long-term objectives for achieving sustainable coastal management, through improvements to existing management systems, the development of new management systems and identifying and dealing with potential areas of conflict.’</i>	HE Policy will support the integrated approach of the strategy which points to cooperation between protection of terrestrial and marine heritage assets and biodiversity potential – underpinned by research and knowledge.	✓	✓
DAERA Policies to manage landscapes - natural, marine and rural environments	The legislative basis for the Department of Agriculture, the Environment and Rural Affairs’ actions is the Nature Conservation and Amenity Lands Order (NI) 1985 (NCALO). Through this, DAERA designates the finest landscape areas as either Areas of Outstanding Natural	Historic Environment Policy will provide high level advice on Government’s attitude to the historic environment which will impact policy, plans and strategies created and actioned by DAERA to conserve ‘historic objects’ and historic landscapes which fall within the remit of DAERA’s policies.	✓	✓

¹⁰² [UK marine policy statement - GOV.UK](#)

¹⁰³ [Marine Plan for Northern Ireland | Department of Agriculture, Environment and Rural Affairs](#)

¹⁰⁴ [Towards an Integrated Coastal Zone Management Strategy for Northern Ireland 2006 - 2026 | Department of Agriculture, Environment and Rural Affairs](#)

	Beauty (AONB) or National Parks land and takes steps to manage them for both conservation and recreation. The purpose of designation is to make sure that policies are created and action carried out about: • conserving or enhancing the natural beauty or amenities of that area • conserving wildlife, <u>historic objects</u> or natural phenomena within it • promoting its enjoyment by the public providing or maintaining public access to it DAERA also manages ‘Cross-Compliance’.¹⁰⁵ The term Cross-Compliance refers to the requirement for farmers to comply with a set of Statutory Management Requirements (SMRs) and keep their land in Good Agricultural and Environmental Condition (GAEC).	The remit for these actions will include the conservation of heritage assets which fall within designated habitats, and undesignated landscapes, seascapes, rural/agricultural landscapes and small settlements. DAERA’s policies to protect, conserve and use natural and man-made landscapes correlate with what will be HE Policy objectives. In March 2022, DAERA announced the publication of the Future Agricultural Policy. All land managers with three or more hectares of eligible agricultural land who meet the scheme requirements will be able to participate; participants will be required to comply with the new Farm Sustainability Standards and participate in the Soil Nutrient Health Scheme package will have an outcome based approach and will focus on creating and restoring habitats that are important for species diversity. Protected zones around monuments for example already make a strong contribution to this objective, but are not currently viewed in this light. HE Policy can support and suggest partnering with DAERA to support cross-compliance opportunities to protect and enhance heritage assets in farmland, forests, and woodlands.		
--	---	---	--	--

¹⁰⁵ [Cross-Compliance | Department of Agriculture, Environment and Rural Affairs](#)

4.7 Part 2 – Landscapes and Seascapes - Environmental Characteristics

SEA topic	SEA Objective
Landscape	• protect and enhance the landscape everywhere and particularly in designated areas • value and protect diversity and local distinctiveness • improve the quantity and quality of publicly accessible open space

4.7.1 Landscapes and Seascapes - Existing Baseline

In Northern Ireland there are:

- Landscape Character Assessments carried out by DAERA recognise the contribution of cultural heritage to the character of landscapes and places.
- 60 Conservation Areas (CAs) in Northern Ireland.
- 8 Areas of Outstanding Natural Beauty (AONBs)
- 16 landscape partnerships (collectively known as Landscapes NI)
- 24 Regional Seascape Areas
- 205 Area of Townscape Character (ATCs)
- 663 Historic Parks, Gardens or Demesnes (HPGs) Grade A and A*
- 324 battle sites
- 11 Areas of Significant Archaeological Interest
- 130 Local Landscape Policy Areas (LCAs)
- 403 Historic Nucleated Settlements

- With 80% of the 1.4 million hectares of land in Northern Ireland in agricultural use¹⁰⁶, a large proportion of archaeological heritage features are found on farmland¹⁰⁷. The protected zones around monuments serve as biodiversity ‘islands’ within agricultural landscapes.
- Much of Northern Ireland’s, nature, landscapes and cultural heritage exist in tandem. The historic environment co-exists with the natural environment in designed landscapes (including urban gardens, parks, demesnes, and rural vernacular/agricultural landscapes, harbours) and natural landscapes (such as protected zones around monuments and protected wrecks).
- Screening for Appropriate Assessment was carried out for HE Policy under the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended). This report concluded that many/most UK National Site Network Sites (both terrestrial and marine) are situated around, or near heritage assets and therefore situated within the zone of influence of HE Policy.
- The Independent Assessment used to help inform the third UK Climate Risk Assessment (CCRA3)¹⁰⁸ assesses 61 risks and opportunities from climate change to Northern Ireland, including to business, infrastructure, housing, the natural environment, our health and from the impacts of climate change internationally.
- Potential sources of data for the Northern Ireland marine area include:
 - Marine Mapviewer¹⁰⁹ - Department of Agriculture, Environment and Rural Affairs
 - Northern Ireland Environmental Statistics Report 2025¹¹⁰ - Department of Agriculture, Environment and Rural Affairs
 - Marine Strategy¹¹¹ - Department of Agriculture, Environment and Rural Affairs
 - NI Coastal Vulnerability Assessment Physical Assets¹¹² - Datasets - Open Data NI
 - Baseline Study and Gap Analysis of Coastal Erosion Risk Management NI¹¹³ - Department for Infrastructure
- In the Republic of Ireland, Natural Capital Accounting for Sustainable Environments is promoted by the Environmental Protection Agency (EPA) as a method to understand the value of Nature¹¹⁴. Natural Capital Accounting provides a framework to track changes in the extent and condition of stocks of assets, and in the flows of services over time. This enables prioritisation and appropriate management of natural assets and the multiple benefits they provide to people, and valuation of assets in holistic terms. Ecosystem Services Mapping has similar potential. Man-made historic environment assets within natural landscapes could be included in this calculation for places if applied to NI.

¹⁰⁶ [Protecting historic monuments on farmland | Department for Communities](#)

¹⁰⁷ [Our Five Aims - Archaeology 2030](#)

¹⁰⁸ [Summary for Northern Ireland \(CCRA3-IA\) - UK Climate Risk](#)

¹⁰⁹ [Marine Mapviewer | Department of Agriculture, Environment and Rural Affairs](#)

¹¹⁰ [Northern Ireland Environmental Statistics Report 2025 | Department of Agriculture, Environment and Rural Affairs](#)

¹¹¹ [Marine Strategy | Department of Agriculture, Environment and Rural Affairs](#)

¹¹² [NI Coastal Vulnerability Assessment Physical Assets - Dataset - Open Data NI](#)

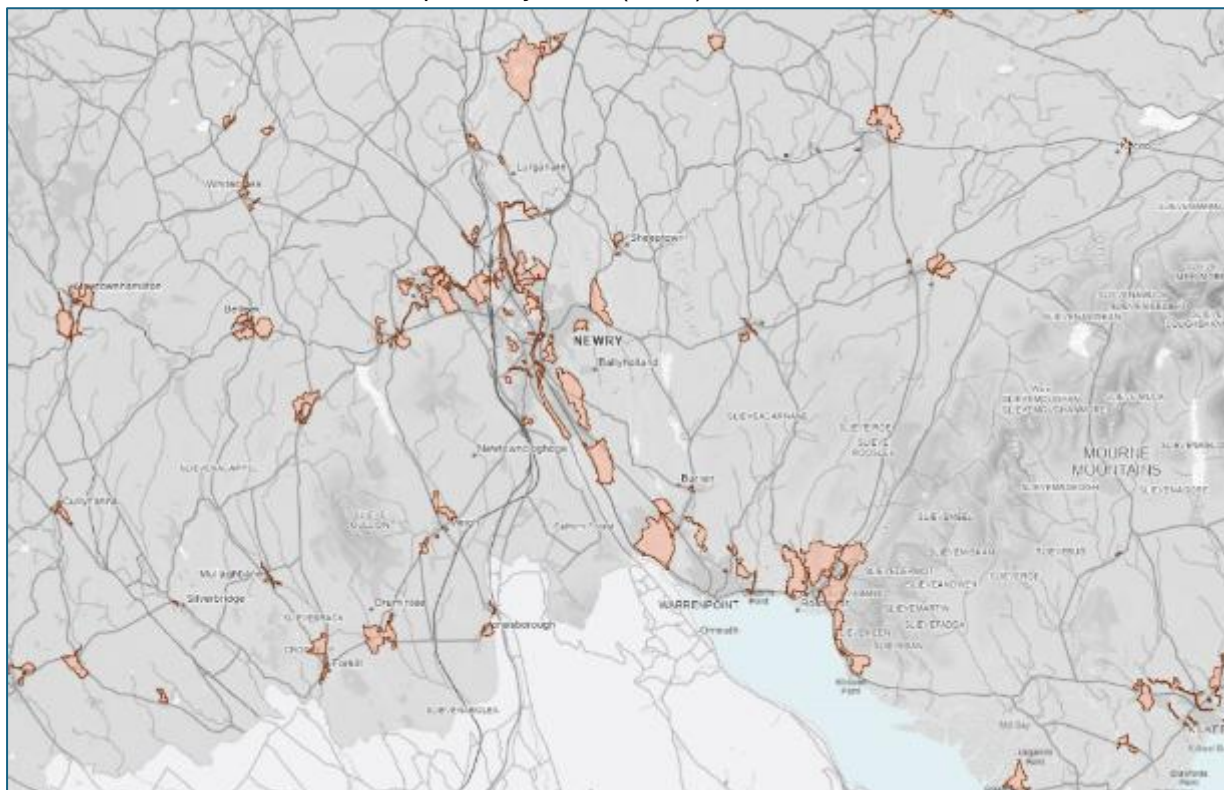
¹¹³ [Baseline Study and Gap Analysis of Coastal Erosion Risk Management NI | Department for Infrastructure](#)

¹¹⁴ [Research_Report-441.pdf](#)

The images below give an indication of the breadth and location of Landscape and Seascape Assets in Northern Ireland.

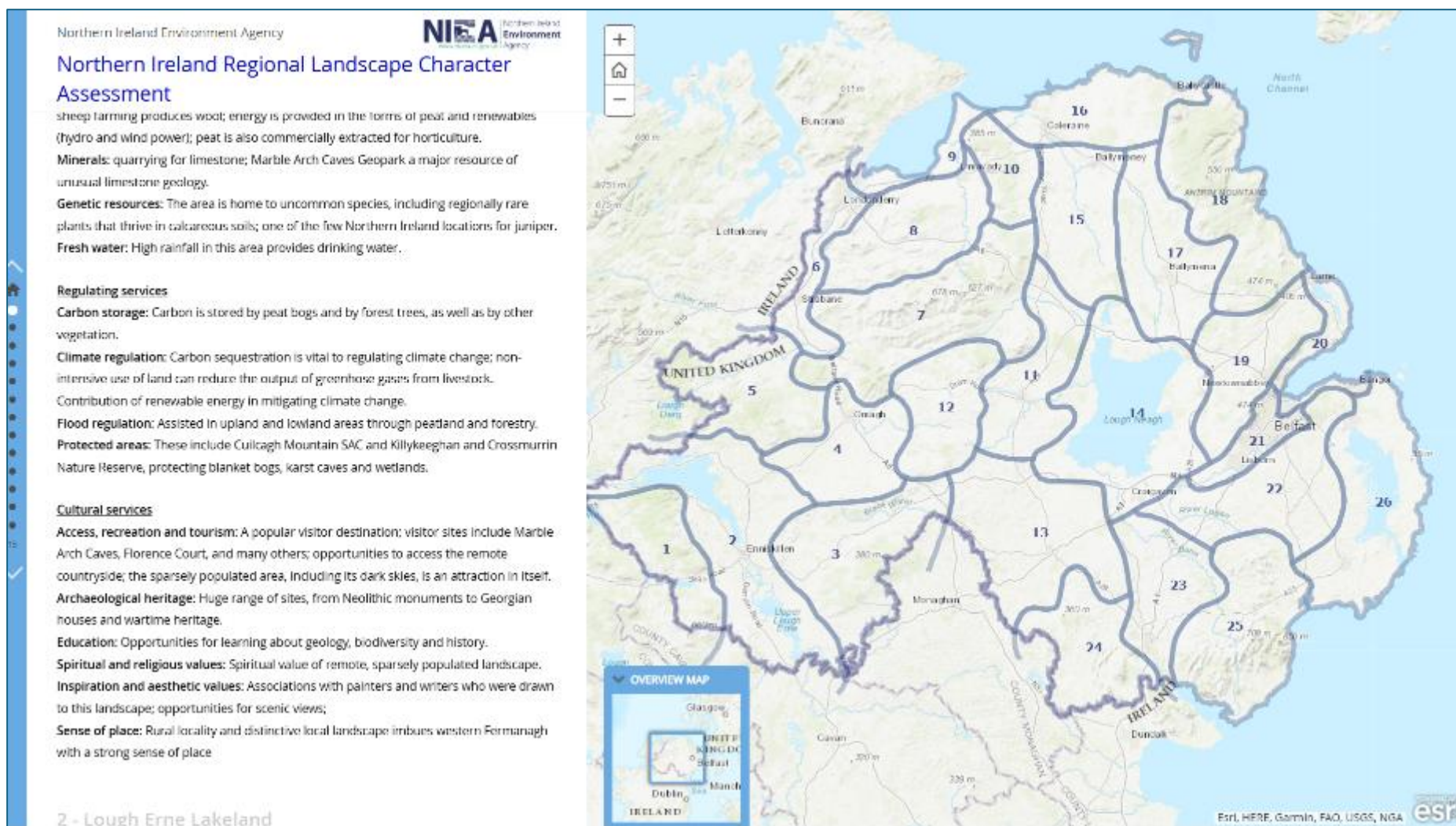
Fig 10 - Sample showing Local Landscape Policy Areas near Newry, County Down - to note the intervisibility with ROI shown to south in light grey – HERoNI HED Map Viewer¹¹⁵ (Crown Copyright)

- NI has 130 Local Landscape Policy Areas (LCAs)



¹¹⁵ [Historic Environment map viewer | Department for Communities](#)

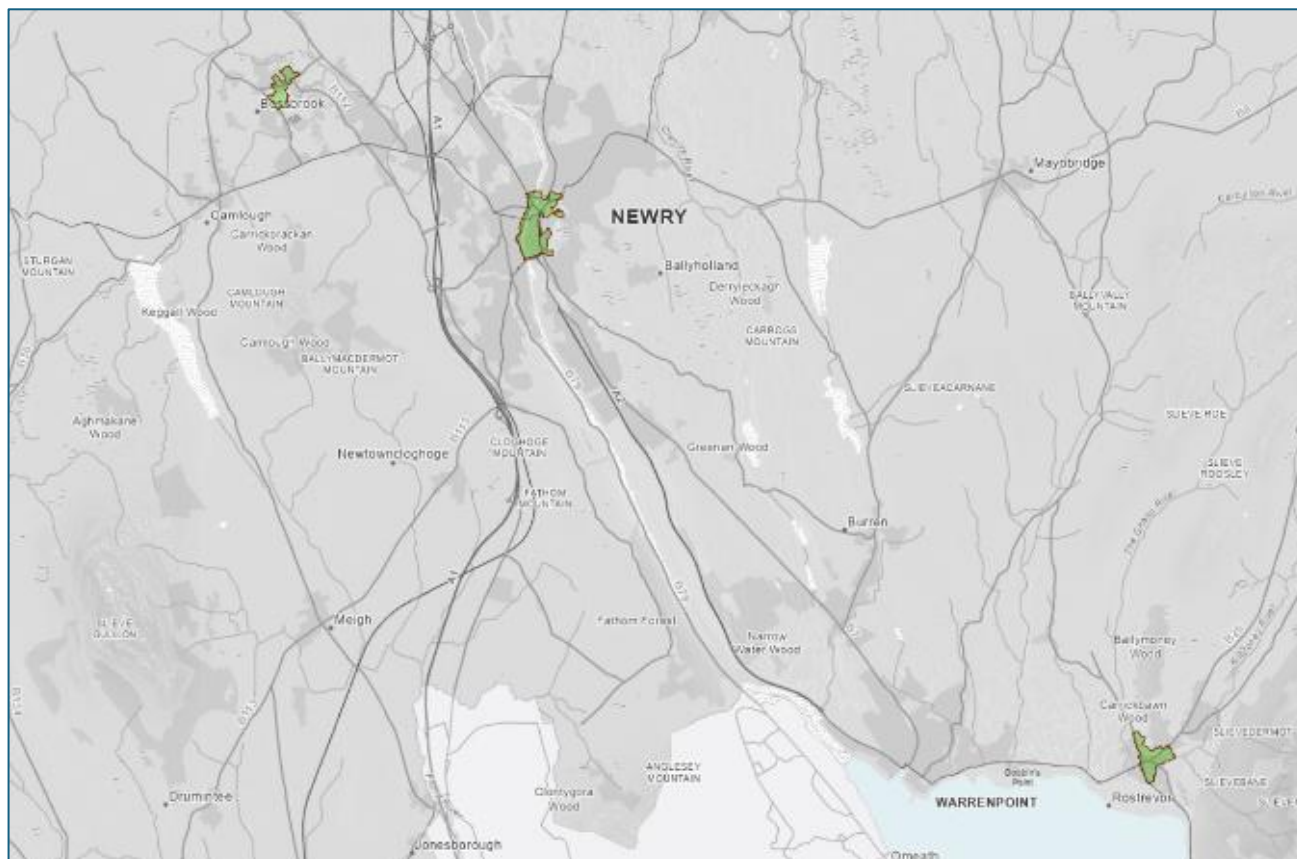
Fig 11 - Sample showing Landscape Character Assessment - (NIEA Map Viewer¹¹⁶ (Crown Copyright))



¹¹⁶ [Natural Environment Map Viewer](#) | Department of Agriculture, Environment and Rural Affairs

Fig. 12 - Sample showing Conservation Areas in Bessbrook, Newry and Rostrevor¹¹⁷ – See Department for Infrastructure and Local Councils for detailed maps¹¹⁸

- NI has 60 Conservation Areas (CAs)



¹¹⁷ [Conservation Areas](#)

¹¹⁸ [Conservation Area Guides \(A-Z list\) | Department for Infrastructure](#)

Fig 13 - Sample area in Newtownards County Down showing Areas of Townscape Character (ATCs)¹¹⁹

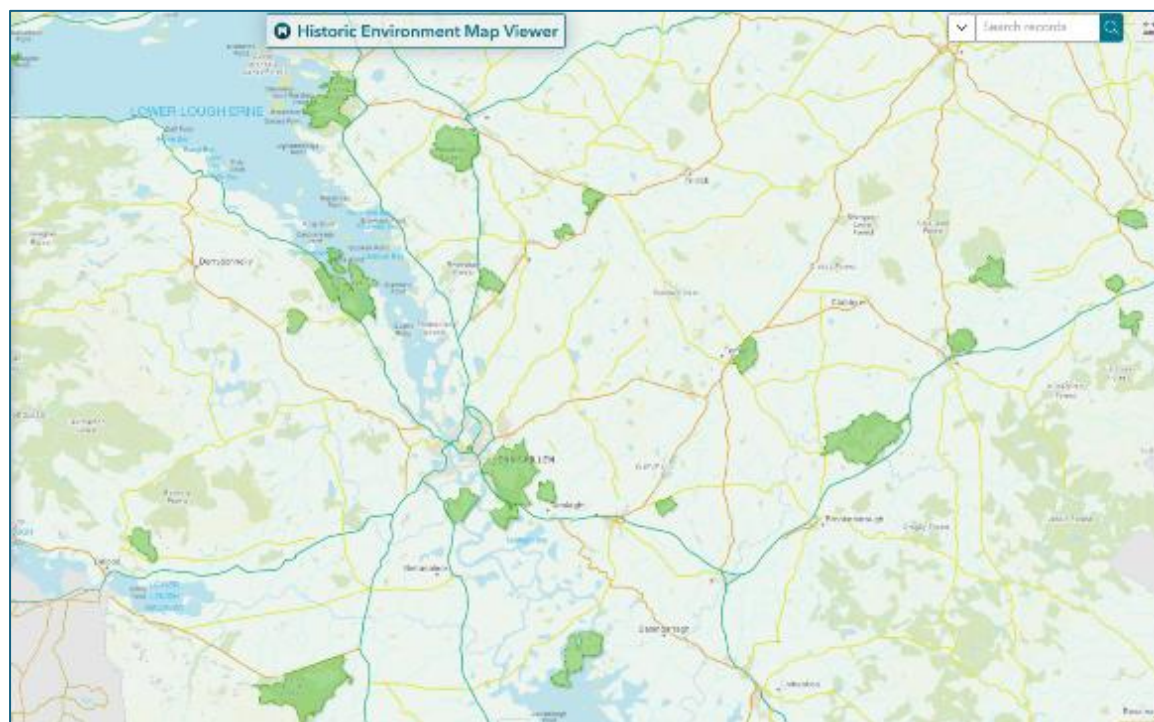
- NI has 205 Areas of Townscape Character (ATCs)



¹¹⁹ [Areas of Townscape Character - Ards and North Down Borough Council](#)

Fig 14 – Historic Parks, Gardens and Demesnes¹²⁰ – Sample Area shown in Fermanagh - HERoNI HED Map Viewer¹²¹ (Crown Copyright)

- Over 700 parks gardens and demesnes are recorded on HERoNI.
- The Register of Parks, Gardens and Demesnes of Special Historic Interest was established in the late 1990s to identify those sites that can be considered of exceptional importance within Northern Ireland. Inclusion is based upon a clear set of criteria and around 252 sites have been selected on the main Register. A comprehensive revision of the entries has been undertaken and is available to view on the Register of Parks and Gardens and Demesnes of Special Historic Interest for Northern Ireland¹²²



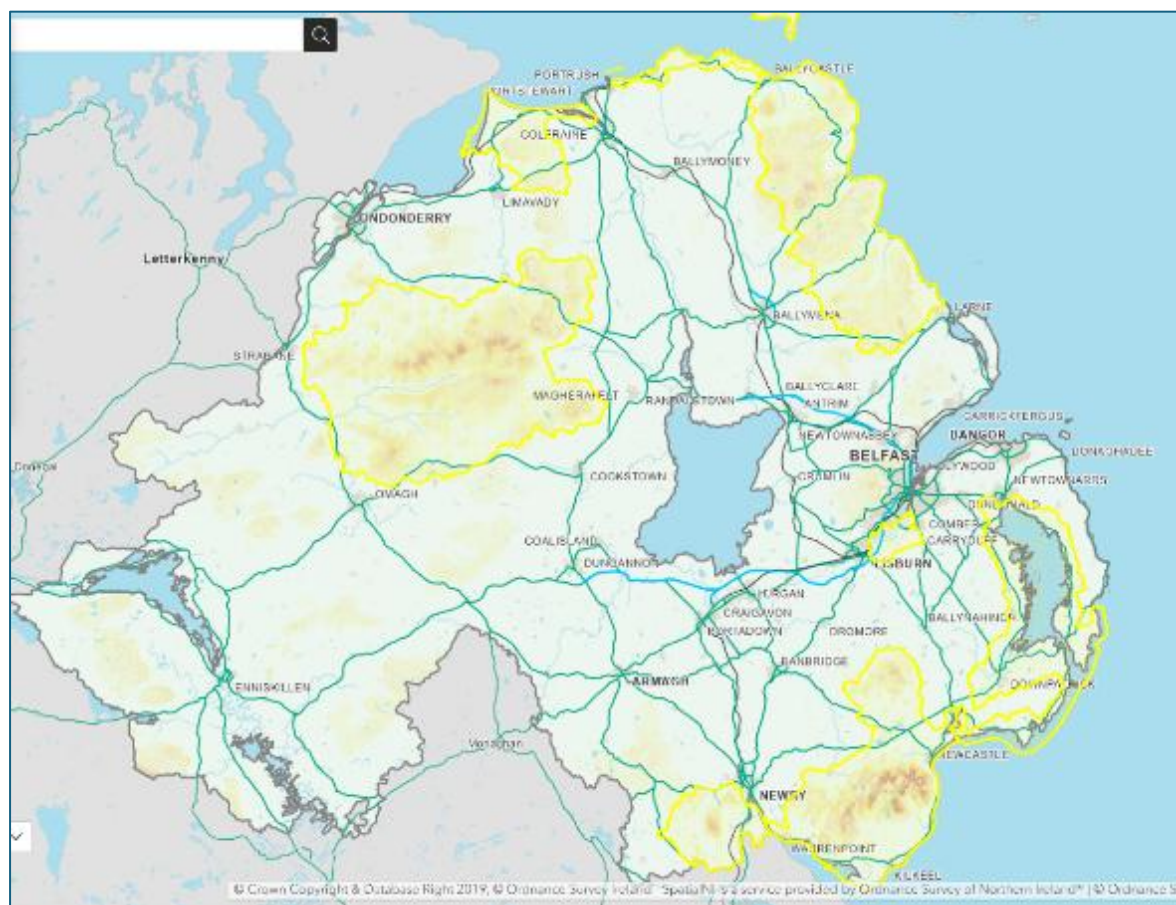
¹²⁰ [Historic Parks, Gardens and Demesnes | Department for Communities](#)

¹²¹ [Historic Environment map viewer | Department for Communities](#)

¹²² [Register of Parks and Gardens and Demesnes of Special Historic Interest for Northern Ireland](#)

Fig 15 - Areas of Natural Beauty (AONBs) – NIEA Natural Environment Map Viewer¹²³ (Crown Copyright)

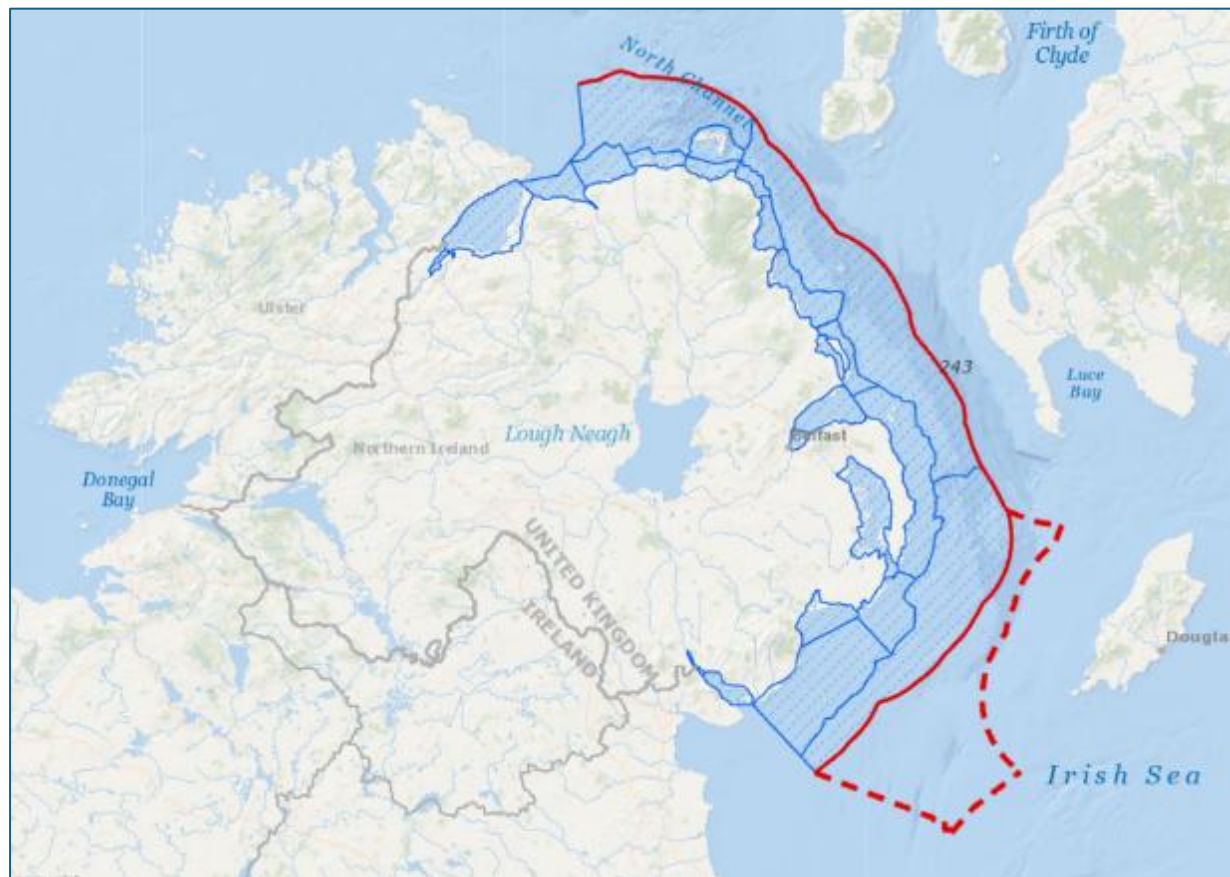
- NI has 8 Areas of Outstanding Natural Beauty (AONBs)



¹²³ [Natural Environment Map Viewer](#) | Department of Agriculture, Environment and Rural Affairs

Fig 16 - Regional Seascape Character Areas in NI (Natural Environment Map Viewer | DAERA) ¹²⁴ Crown Copyright)

- NI has 24 Regional Seascape Areas



¹²⁴ [Natural Environment Map Viewer | Department of Agriculture, Environment and Rural Affairs](#)

4.7.2 Landscapes and Seascapes - Environmental Problems

- The connection between Landscape and Cultural Heritage in Policy has been partially severed with HED having been moved out of the Northern Ireland Environment Agency in 2014 and transferred to a different Department in 2016.
- Place-based partnerships which stretch across administrative boundaries and recognise the synergies between sustainable development, and protection of landscape, flora and fauna, heritage and intangible heritage (such as the Lough Neagh Partnership) are not permanent and therefore can be limited in their scope despite having proven benefits – these rely on time-bound funding bids for example from the National Lottery Heritage Fund.
- Whilst there are 60 Conservation Areas in NI, no new CA designation has occurred for 20 years. Within those that exist, numbers of demolitions are not publicly reported.
- Local councils have not used their powers to create ‘Local listings’, citing a lack of heritage resource/training.
- Funding which supports private owners of heritage assets is not generally recognised as having a ‘public good’.
- The ‘Conservation Deficit’¹²⁵ means that it often does not make economic sense to invest privately in heritage buildings outside the centre of Belfast or in some conservation areas like Hillsborough, where there is a recognised ‘Heritage Premium’. This issue is particularly acute where buildings have been vacant and not maintained for a long period.
- Elsewhere, councils are reluctant to use the powers they have to enforce and use Urgent Works Notices to protect heritage assets, contributing to the quality of places.
- The contribution of the historic environment to quality places is recognised mainly in development in terms of designation – for example within conservation areas, listed buildings, scheduled monuments or historic parks and gardens. Some monuments, historic buildings, industrial heritage and defence heritage assets are not determined as being of ‘special’ interest but are worthy of recording. Therefore, though they may be a ‘material consideration’ in planning terms, they are not protected by legislation from demolition.
- For environmental problems concerning seascapes – see also p. 119 Section 4.13.4 ‘Air, Soil and Water – Environmental problems’

¹²⁵ ‘Conservation deficit - The amount by which the cost of repair (and conversion to optimum viable use if appropriate) of a heritage asset exceeds its market value on completion of repair and conversion, allowing for all appropriate development costs.’ [HEAG](#)

4.8 Biodiversity, Flora & Fauna

4.9 Part 1 - Biodiversity, Flora, Fauna – Relationship with other plans, strategies and programmes

SEA Topic - Biodiversity, Flora, Fauna				
Protection Relevant legislation: • The Environment (NI) Order 2002 • Planning Act (NI) 2011 • The Wildlife (NI) Order 1985 (as amended) • Wildlife and Natural Environment Act ('The WANE Act') (Northern Ireland) 2011¹²⁶ • The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended)				
International Convention, declaration or charter	Legislative basis, environmental objectives or requirements of the plan or programme	How objectives and requirements of other plans or programmes might be taken on board in Historic Environment Policy (HE Policy) or how HE Policy might impact other plans, policies or programmes	Impacts on HE Policy	HE Policy may impact outcomes
UNESCO World Heritage Convention Concerning the Protection of the World Cultural ¹²⁷	This convention is legally binding. The UK ratified this Convention in 1972. The most significant feature of the 1972 World Heritage Convention is that it links together in a single document the concepts of nature conservation and the preservation of cultural properties. The Convention recognizes the way in which people interact with nature, and the fundamental need to	Historic Environment Policy will support and enhance the strategic objectives of this Convention in Northern Ireland, focusing on communities, awareness and protection of world heritage sites. In Northern Ireland there are currently two world heritage sites – the Giant's Causeway (a natural site) and Gracehill village (a cultural site) a part of the transnational Moravian Church Settlements World Heritage	✓	

¹²⁶ [Wildlife and Natural Environment Act \(Northern Ireland\) 2011](#)

¹²⁷ [Cultural heritage | UNESCO UIS](#)

and Natural Heritage (1972)¹²⁸	preserve the balance between the two. The ‘five C’s’ are the strategic objectives adopted by the World Heritage committee in 2002 and 2007: • Credibility - Strengthen the Credibility of the World Heritage List, as a representative and geographically balanced testimony of cultural and natural properties of outstanding universal value; • Conservation - Ensure the effective Conservation of World Heritage properties; • Capacity-building - Promote the development of effective Capacity-building measures, including assistance for preparing the nomination of properties to the World Heritage List, for the understanding and implementation of the World Heritage Convention and related instruments; • Communication - Increase public awareness, involvement and support for World Heritage through communication; Communities. - Enhance the role of communities in the implementation of the World Heritage Convention.	Site. However, amplifying and making the most of the transboundary significance of NI heritage assets will be one of the aims of HE Policy.		
Other plan/programme or strategy	Legislative basis, environmental objectives or requirements of the plan or programme	How objectives and requirements of other plans or programmes might be taken on board in Historic Environment Policy (HE Policy) or how HE Policy might impact other plans, policies or programmes	Impacts on HE Policy	HE Policy may Impact outcomes

¹²⁸ [1972, Convention Concerning the Protection of the World Cultural and Natural Heritage – ICOMOS CIVVIH](#)

Regional Development Strategy 2035 (RDS)¹²⁹	The RDS has a statutory basis. It sets out the framework for the spatial development for the Northern Ireland Region up to 2035. The RDS is cross-cutting with linkages to other key government policies and statutory legislation.	Historic Environment Policy will align with and expand on the Regional Development Strategy 2035 (RDS) which lists as one of its 8 key aims to: <i>‘Protect and enhance the environment for its own sake.’</i> It sets out regional guidance to “ <i>Conserve, protect and where possible, enhance our built heritage and our natural environment</i> ”	✓	✓
Strategic Planning Policy Statement (SPPS)¹³⁰	(SPPS) proposes that: <i>‘Sustaining and enhancing biodiversity is fundamental to furthering sustainable development. The Northern Ireland Biodiversity Strategy and EU Biodiversity Strategy seek to halt the loss of biodiversity and ecosystems services by 2020. Furthermore, the Wildlife and Natural Environment Act (Northern Ireland) 2011 places a statutory duty on every public body to further the conservation of biodiversity. However, all of us share the collective responsibility to preserve and improve the natural environment and halt the loss of biodiversity for the benefit of future generations.’</i> Regional strategic objectives for Biodiversity, flora and fauna are to: • <i>protect, conserve, enhance and restore the abundance, quality, diversity and distinctiveness of the region’s natural heritage</i> • <i>further sustainable development by ensuring that natural heritage and associated diversity is conserved and enhanced as an integral part of social, economic and environmental development;</i>	Historic Environment Policy will align with and expands on the Strategic Planning Policy Statement HE Policy will provide high level advice on Government’s attitude to the historic environment which will influence the implementation of the SPPS (SPPS is based on protective legislation, however, it is guided by policy in practice.) HE Policy will set the framework for managing and protecting heritage assets conserving, enhancing and promoting <i>‘sustainable development and environmental stewardship’</i> of assets which may be protected, may be of heritage value (even if unprotected) or may sit within natural or cultural sites such as LLPAs (Local Landscape Policy Areas) AONBs (Areas of Natural Beauty) and Conservation Areas – this will have a beneficial effect on protected assets and sites and their wider settings – the built and natural environment. HE Policy will recommend how the historic environment can support places at varying scales to make the most of their heritage assets to benefit local communities, and their local environments. This should impact actions and strategies or local plans such as Local Development Plans, Heritage Plans and Climate Change Action Plans for local councils.’	✓	✓

¹²⁹ [Regional Development Strategy 2035 | Department for Infrastructure](#)

¹³⁰ [Strategic Planning Policy Statement for Northern Ireland \(SPPS\)](#)

	• <i>assist in meeting international (including European), national and local responsibilities and obligations in the protection and enhancement of the natural heritage;</i> • <i>contribute to rural renewal and urban regeneration by ensuring developments take account of the role and value of natural heritage in supporting economic diversification and contributing to a high quality environment;</i> • <i>take actions to reduce our carbon footprint and facilitate adaptation to climate change.'</i>	<i>Deliver[ing] economic and community benefit', whilst benefitting the environment.</i> HE Policy will support the re-use of buildings to reduce waste, therefore contributing to <i>'taking action to reduce our carbon footprint'</i>.		
Northern Ireland Environmental Improvement Plan (EIP)¹³¹	As noted above, the strategic objectives of the EIP include: • Excellent air, water and land quality;	HE Policy will augment the EIP: through management and appreciation of the historic environment, as well as an emphasis on re-use and support for adaptation to climate change impacts, HE Policy supports to the EIP objectives to achieve excellent air, water and land quality, which supports biodiversity.	✓	✓
Biodiversity Strategy for NI to 2020¹³²	This Strategy is now past its date of 2020, however the principles still apply: <i>'Much of our natural heritage has been heavily influenced by previous generations. We are entrusted with protecting it and handing it on safely to future generations.'</i> It describes <i>'..valuing the environment in the broadest context.'</i> and also that: <i>'Ecosystems are inter-dependent systems of living things (plants, micro-organisms and animals, including people) in their physical environment.'</i>	This emphasis on and requirement for protection and management of natural ecosystems aligns with HE Policy's objectives. This 'Ecosystem approach' applies also to the historic environment – whether urban, aquatic or rural – the interventions that have been made and might be made should be considered for their impact as a whole.	✓	✓

¹³¹ [Environmental Improvement Plan for Northern Ireland | Department of Agriculture, Environment and Rural Affairs](#)

¹³² <https://www.daera-ni.gov.uk/publications/biodiversity-strategy-northern-ireland-2020-0>

	<i>They overlap and interact and are impacted upon by a wide variety of human and natural factors. When determining how well the environment is functioning, we need to look at systems and their complex interrelationships rather than individual organisms or species. This is termed the ecosystem approach and forms the basis of modern biodiversity protection legislation and practice. The Strategy adopts that approach as well as the corollary of ecosystem services that looks at the many goods and services ecosystems provide to people.'</i>	In many cases, passive protection has been provided for ecosystems as a result of the protection of heritage assets like monuments, parks and gardens, intertidal zones or underwater wrecks. These complimentary activities and relationships will be highlighted and supported, with the argument for the potential for further alignment made in HE Policy.		
--	--	---	--	--

4.10 Part 2 – Biodiversity, Flora & Fauna - Environmental Characteristics

SEA topic	SEA Objective
Biodiversity, Flora and Fauna	• avoid damage to designated wildlife and geological sites and protected species • maintain biodiversity, avoiding irreversible losses • restore the full range of characteristic habitats and species to viable levels • reverse the long term decline in farmland birds • ensure the sustainable management of key wildlife sites and the ecological processes on which they depend • provide opportunities for people to come into contact with and appreciate wildlife and wild places

4.10.1 Biodiversity, Flora & Fauna - Existing Baseline

- Areas of Special Scientific Interest (ASSIs) are protected areas that represent the best of Northern Ireland's wildlife and geological sites that make a considerable contribution to the conservation of our most valuable natural places.
- By March 2025, 111,159 hectares across 394 sites were declared Areas of Special Scientific Interest (ASSI). 246,300 hectares across 58 sites were declared Special Areas of Conservation (SACs) and 114,600 hectares across 16 sites as Special Protection Areas (SPAs). 77,700 hectares across 20 sites were declared Ramsar sites (areas of wetland and waterfowl conservation), and 26,178 hectares across 5 sites as Marine Conservation Zones (MCZs).
- In Northern Ireland, over 52 per cent of forests and woodlands are managed by Forest Service¹³³.
- ‘...many Natura 2000¹³⁴ sites [now known as UK Site Network Sites] closely associated with cultural sites. For instance, of the 365 World Heritage Sites in the EU, almost 20% are located in, or directly on the border of a Natura 2000 site. A further 142 sites (or 42%) are within walking distance (2 km or less away).’¹³⁵

¹³³ <https://www.forestresearch.gov.uk/tools-and-resources/statistics/forestrystatistics/>

¹³⁴ [The Natura 2000 protected areas network — European Environment Agency](#)

¹³⁵ [Europe's cultural and natural heritage in natura 2000-KH0418385ENN.pdf](#)

- The wild bird population indicator using 56 bird species shows that wild bird abundance in Northern Ireland is at a similar level to that in the mid-1990s when the Breeding Bird Survey started. Bird populations peaked in 2005 and have been in general decline since, driven principally by bird species found in farmland habitats.
- There are only five species considered to be strongly associated with urban habitats, and one of these (Pied Wagtail) is found in a wide range of habitats rather than being a true urban specialist. The urban bird indicator shows an increase of 31 per cent between 1996 and 2023, driven by increases in four of the five species, especially House Martin but also House Sparrow and Collared Dove. Only Swift shows a decline, of almost 40 per cent.
- In 2024/25¹³⁶, the area of terrestrial protected sites under management in Northern Ireland was recorded as at least 25,710 hectares. A range of initiatives and delivery mechanisms, which include potential funding, have been identified to help achieve favourable condition for terrestrial sites, including:
 - In 2023 the Centre of Environmental Data and Recording (CEDaR) gained approval for 10 year funding to continue and expand as Northern Ireland's environmental records centre. Legislative species survey works are now embedded within CEDaR for the next 10 years, which will increase our understanding of numerous features of protected sites and inform appropriate management.
 - Continuation of the Environmental Farming Scheme Higher Level agreements which commenced in early 2018.
 - The Management of Sensitive Site (MoSS) programme delivers bespoke and targeted management, in partnership with landowners, to work towards favourable condition of ASSI features.
 - Continue to provide support to the two INTERREG Va Habitats projects delivering a series of conservation management plans and conservation actions for a range of cross border sites.
 - Working with local authorities to protect priority habitats and species advising on development control and new area plans.
 - Developing working examples on the most effective way of measuring natural capital to ensure that the full benefits of natural assets are realised which will ultimately inform elements of Conservation Management Plans.
 - Working with DAERA's grant-aid budget and external EU and Heritage Lottery Fund (HLF) funding to manage designated sites and priority habitats and species. 2023 saw the roll out of a new Environment Fund cycle which incorporates various environmental improvement projects many of which are focused on protected sites. During 2024-25 as part of the Strategic Strand of the Environment Fund, 40 Letters of Offer were issued to applicants totalling over £10.1m and along with close to £0.3m to support 12 projects under the Water Quality Challenge Fund.
 - A Peatland Challenge Fund Competition for 2024/27 was launched in May 2024, under the EF grant programme, with financial support for this fund from the Irish Government's Shared Island Fund Initiative.

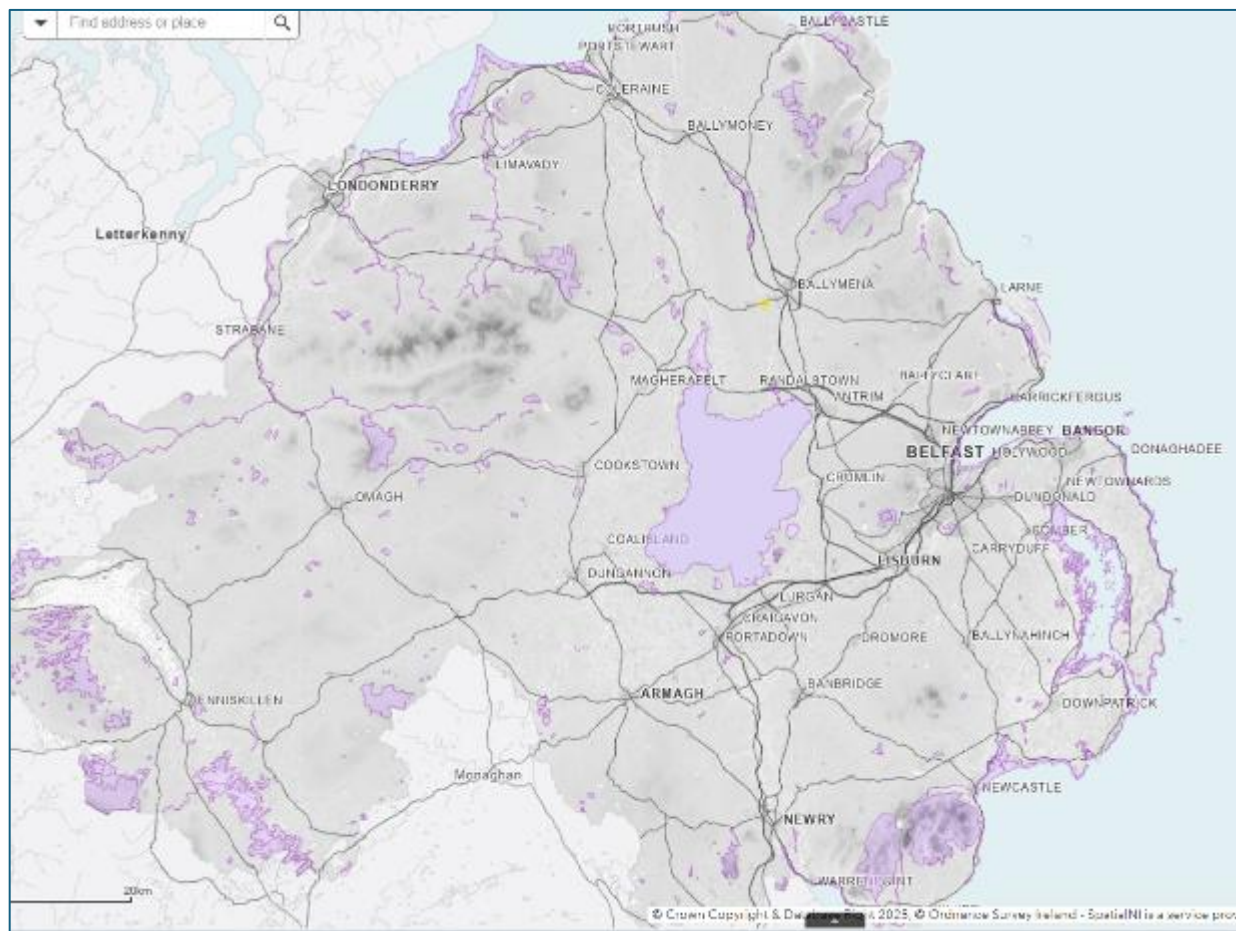
¹³⁶ [Northern Ireland Environmental Statistics Report 2025 | Department of Agriculture, Environment and Rural Affairs](#)

- The Independent Assessment used to help inform the third UK Climate Risk Assessment (CCRA3)¹³⁷ assesses 61 risks and opportunities from climate change to Northern Ireland, including to business, infrastructure, housing, the natural environment, our health and from the impacts of climate change internationally. **Risks to cultural heritage have been identified.** In addition the report identifies:
 - Risks to terrestrial species and habitats from changing climatic conditions and extreme events, including temperature change, water scarcity, wildfire, flooding, wind, and altered hydrology (including water scarcity, flooding and saline intrusion).
 - Risks to terrestrial species and habitats from pests, pathogens and invasive species.
 - Risks to soils from changing climatic conditions including seasonal aridity and wetness.
 - Risks to natural carbon stores and sequestration from changing climatic conditions, including temperature change and water scarcity.
 - Risks to and opportunities for agricultural and forestry productivity from extreme events and changing climatic conditions (including temperature change, water scarcity, wildfire, flooding, coastal erosion, wind and saline intrusion).
 - Risks to agriculture from pests, pathogens and invasive species.
 - Risks to forestry from pests, pathogens and invasive species.
 - Risks to freshwater species and habitats from changing climatic conditions and extreme events, including higher water temperatures, flooding, water scarcity and phenological shifts.
 - Risks to marine species, habitats and fisheries from changing climatic conditions, including ocean acidification and higher water temperatures.
 - Risks to marine species and habitats from pests, pathogens and invasive species.
 - Risks and opportunities to coastal species and habitats due to coastal flooding, erosion and climate factors.

¹³⁷ [Summary for Northern Ireland \(CCRA3-IA\) - UK Climate Risk](#)

The images below give an indication of the breadth and location of Biodiversity Assets in Northern Ireland.

Fig 17 - Areas of Special Scientific Interest (ASSIs) – NIEA Natural Environment Map Viewer¹³⁸ (Crown Copyright)

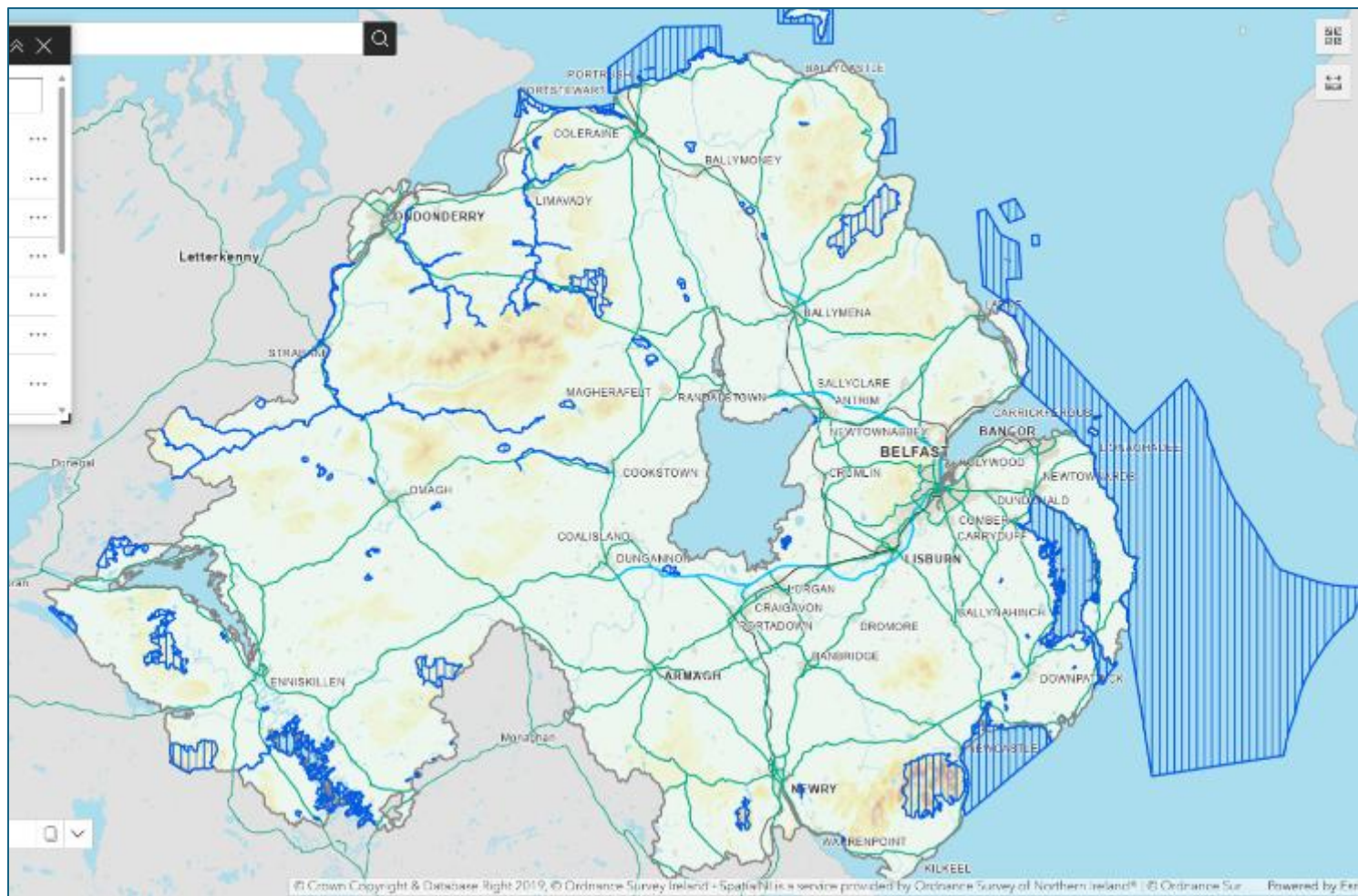


¹³⁸ [Natural Environment Map Viewer](#) | Department of Agriculture, Environment and Rural Affairs

Fig 18 - Showing ASSIs in Fermanagh (Crown Copyright)

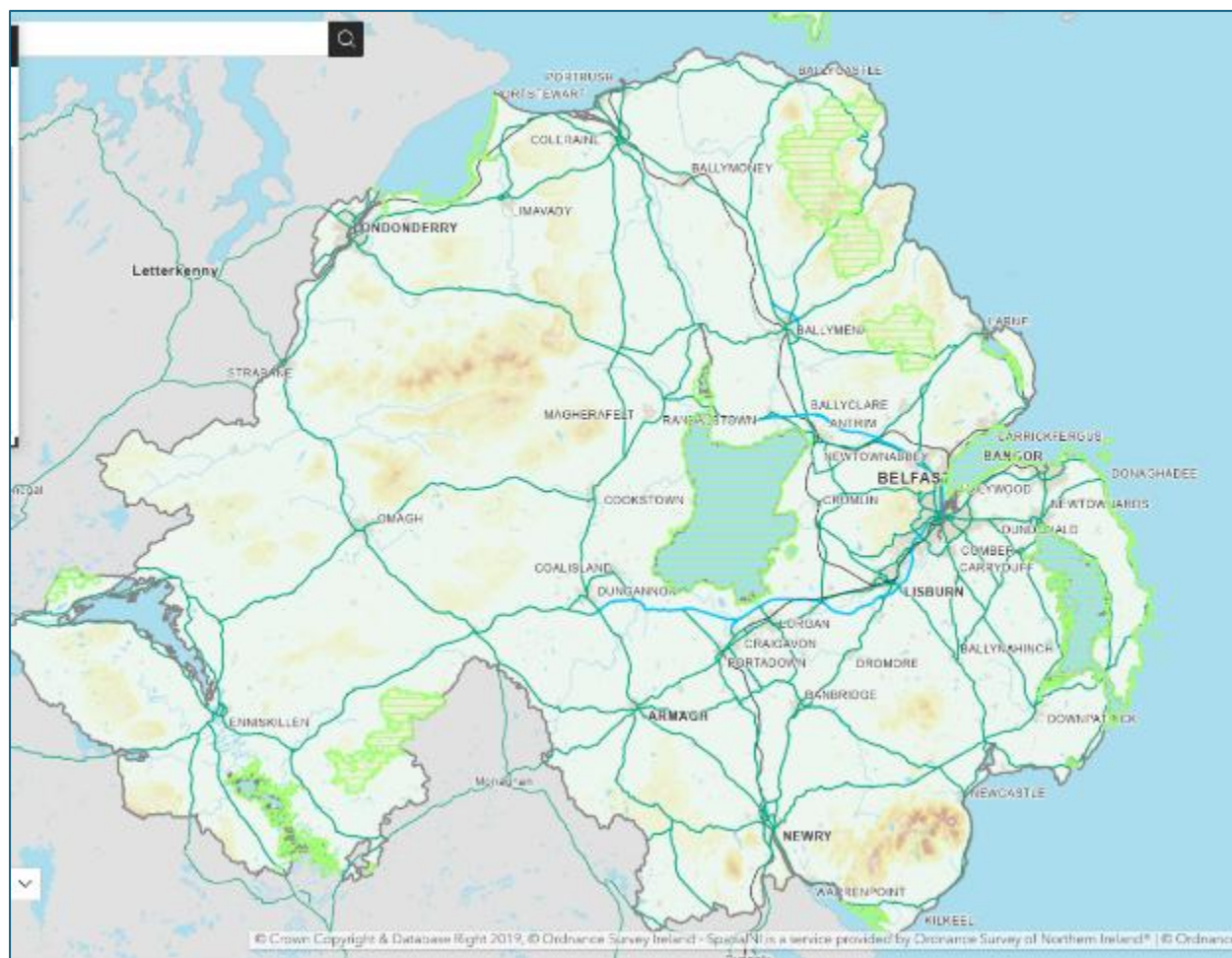


Fig 19 – National Site Network – Special Areas of Conservation (SACs) – NIEA Natural Environment Map Viewer¹³⁹ (Crown Copyright)



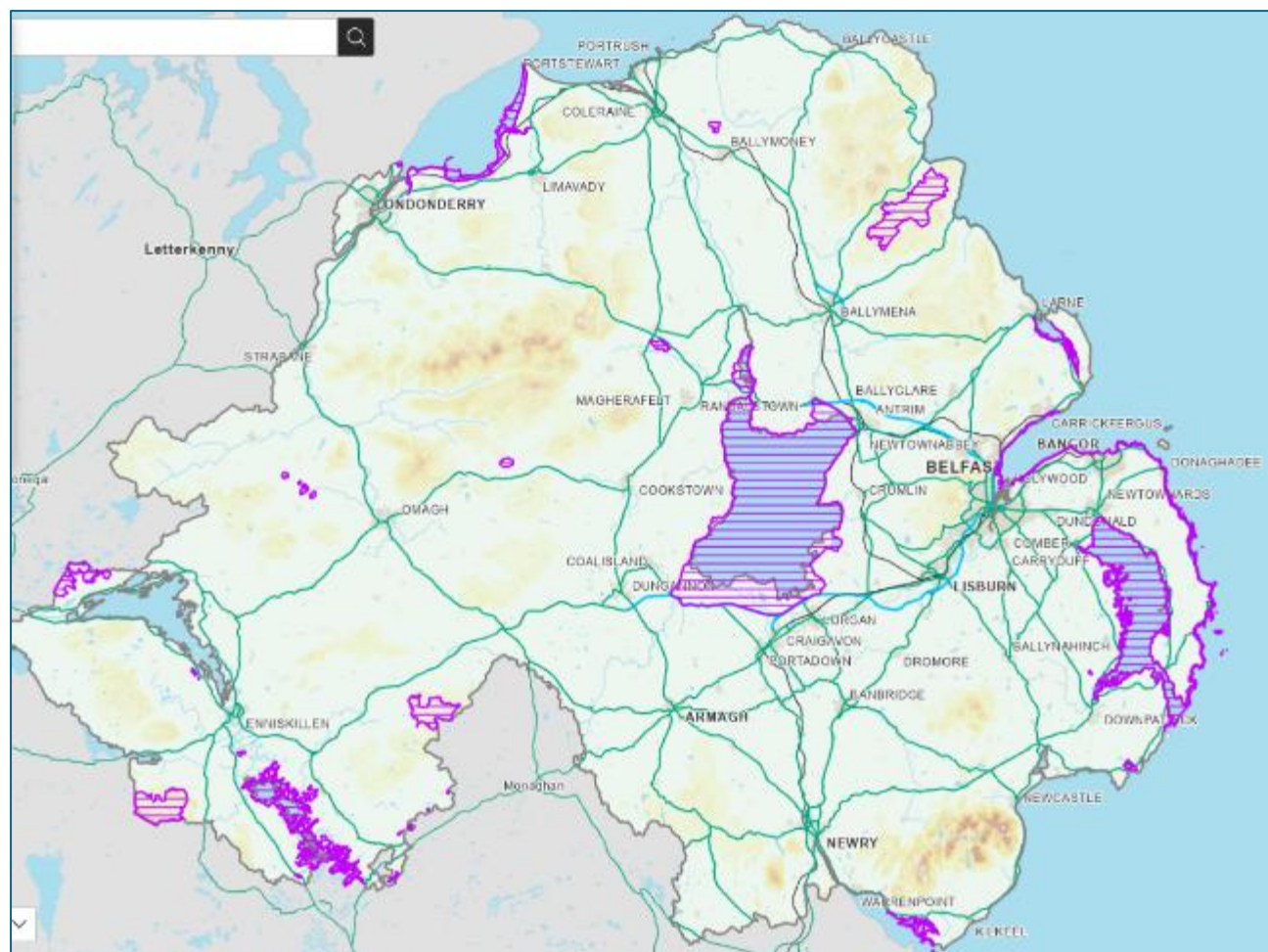
¹³⁹ [Natural Environment Map Viewer | Department of Agriculture, Environment and Rural Affairs](#)

Fig 20 – National Site Network – Special Protection Areas (SPAs) – HERoNI HED Map Viewer¹⁴⁰ (Crown Copyright)



¹⁴⁰ [Historic Environment map viewer](#) | Department for Communities

Fig 21 – National Site Network – Ramsar zones – HERoNI HED Map Viewer¹⁴¹ (Crown Copyright)



¹⁴¹ [Historic Environment map viewer](#) | Department for Communities

4.10.2 Biodiversity, Flora and Fauna - Environmental problems

The Office for Environmental protection (OEP)¹⁴² reports that: ‘ Current pressures on nature in Northern Ireland are unsustainable and urgent action is needed to protect and improve the environment for this and future generations.’... ‘Government must act urgently and decisively, not only to reverse a lifetime of environmental degradation and to restore the diversity of Northern Ireland’s habitats and species, but also to ensure a sustainable agri-food industry and wider economy.’. “Failure to do so risks a heavy toll on the prosperity and well-being of future generations.’

‘The report finds that the two principal pressures causing biodiversity loss are land use change and pollution, closely linked to agricultural intensification. Excess nutrients, in the form of fertilisers and animal wastes from farming and from sewage, are the main forms of pollution having an impact. The report finds that agri-industry in its current form is making unsustainable demands on the environment.

Alongside agriculture and sewage management, other issues contributing to on-going biodiversity loss include waste management, resource extraction, urban development and chemical pollution.

The Office for Environmental Protection identifies three areas where action should be prioritised:

- ‘Reduce pollution by nutrients from farming and sewage. Northern Ireland has an unsustainable nutrient surplus
- Change land use to restore habitats. Most semi-natural habitats have been destroyed or become fragmented by land use change. A focus on restoration and nature-positive land use change is essential
- Reduce material and ecological footprints. The extraction, consumption and disposal of raw materials are causing widespread damage to biodiversity within Northern Ireland and beyond. ‘

¹⁴² [OEP report on the drivers and pressures affecting nature in Northern Ireland | Office for Environmental Protection](#)

4.11 Air, Water and Soil

4.12 Part 1 - Air, Water and Soil – Relationship with other plans, policies and programmes

SEA Topic - Air, Water and Soil				
Protection Relevant legislation: • Planning Act (NI) 2011 • Planning Policy Statements (PPS – in particular PPS6, PPS16, PPS21). It should be noted that the PPS's will be superseded by Local Development Plans when they are adopted. • Protection of Military Remains Act 1986 • Protection of Wrecks Act, 1973 • Merchant Shipping Act 1995 • The Fisheries Act (Northern Ireland) 1966 • Treasure Act 1996 • UK Marine and Coastal Access Act 2009 • The Marine Act (NI) 2013 • Nature Conservation and Amenity Lands Order (NI) 1985 (NCALO) • The Water Environment (Floods Directive) Regulations 2009				
International Convention, declaration or charter	• Legislative basis, environmental objectives or requirements of the plan or programme	How objectives and requirements of other plans or programmes might be taken on board in Historic Environment Policy (HE Policy) or how HE Policy might impact other plans, policies or programmes	Impacts on HE Policy	HE Policy may impact outcomes

United Nations Convention on the Law of the Sea (UNCLOS)¹⁴³ and UNESCO Convention on Underwater Heritage (2001)¹⁴⁴	These conventions are legally binding once ratified. The Convention on the Law of the Sea has been ratified by the UK. Whilst the UK Government have adopted the principles set out in the annex to the Convention as best practice in the management of Underwater Cultural Heritage, ratification is under review. The objective of both is to protect underwater heritage. The UNESCO Convention establishes a common framework for the identification, preservation and sustainability of objects that have been immersed underwater for at least 100 years.	Historic Environment Policy will support the objective of these Conventions to identify, preserve and sustain underwater heritage through policy aims to conserve, protect and value heritage assets.		
Other plan/programme or strategy	Legislative basis, environmental objectives or requirements of the plan or programme	How objectives and requirements of other plans or programmes might be taken on board in Historic Environment Policy (HE Policy) or how HE Policy might impact other plans, policies or programmes	Impacts on HE Policy	HE Policy may impact outcomes
Northern Ireland Environmental Improvement Plan (EIP)¹⁴⁵	As noted above, the strategic objectives of the EIP include: • Excellent air, water and land quality • Sustainable production and consumption on land and at sea	HE Policy will augment the EIP through management and appreciation of the historic environment, which sits amongst and is integral to economic activity like tourism, agriculture and leisure activities.		
UK High Level Marine Objectives 2008 and	<i>‘The UK Marine Policy Statement (MPS) is the framework for preparing Marine Plans and taking decisions affecting the marine environment.’</i>	Historic Environment Policy aims will align with the common objectives within these three directives, supporting Marine Policy to protect underwater and inshore heritage in Northern Ireland.		

¹⁴³ [UNCLOS+ANNEXES+RES.+AGREEMENT](#)

¹⁴⁴ [Underwater Cultural Heritage 2001 Convention | UNESCO](#)

¹⁴⁵ [Environmental Improvement Plan for Northern Ireland | Department of Agriculture, Environment and Rural Affairs](#)

UK Marine Policy Statement (MPS) ¹⁴⁶ and the Marine Plan for Northern Ireland (once adopted) ¹⁴⁷	<i>‘The Marine Plan for Northern Ireland will inform and guide the regulation, management, use and protection of our marine area. It is a single document made up of two plans, one for the inshore region and one for the offshore region.’</i> The objectives within these frameworks include ‘<i>To promote the preservation and enjoyment of marine related heritage assets</i>’.			
Towards an Integrated Coastal Zone Management Strategy for Northern Ireland 2006-2026 ¹⁴⁸ (DAERA)	<i>‘This strategy is intended to set out long-term objectives for achieving sustainable coastal management, through improvements to existing management systems, the development of new management systems and identifying and dealing with potential areas of conflict. ‘</i>	HE Policy will support the integrated approach of the strategy which points to cooperation between protection of terrestrial and marine heritage assets and biodiversity potential – underpinned by research and knowledge.	✓	✓
DAERA Policies to manage landscapes - natural, marine and rural environments	The legislative basis for the Department of Agriculture, the Environment and Rural Affairs’ actions is the Nature Conservation and Amenity Lands Order (NI) 1985 (NCALO). Through this, DAERA designates the finest landscape areas as either Areas of Outstanding Natural Beauty (AONB) or National Parks land and takes steps to manage them for both conservation and recreation. The purpose of designation is to make sure that policies are created and action carried out about:	Historic Environment Policy will provide high level advice on Government’s attitude to the historic environment which will impact policy, plans and strategies created and actioned by DAERA to conserve ‘historic objects’ and historic landscapes which fall within the remit of DAERA’s policies. The remit for these actions will include the conservation of heritage assets which fall within designated habitats, and undesignated landscapes, seascapes, rural/agricultural landscapes and small settlements.	✓	✓

¹⁴⁶ [UK marine policy statement - GOV.UK](#)

¹⁴⁷ [Marine Plan for Northern Ireland | Department of Agriculture, Environment and Rural Affairs](#)

¹⁴⁸ [Towards an Integrated Coastal Zone Management Strategy for Northern Ireland 2006 - 2026 | Department of Agriculture, Environment and Rural Affairs](#)

	- conserving or enhancing the natural beauty or amenities of that area - conserving wildlife, <u>historic objects</u> or natural phenomena within it - promoting its enjoyment by the public providing or maintaining public access to it DAERA also manages 'Cross-Compliance'.¹⁴⁹ The term Cross-Compliance refers to the requirement for farmers to comply with a set of Statutory Management Requirements (SMRs) and keep their land in Good Agricultural and Environmental Condition (GAEC).	DAERA's policies to protect, conserve and use natural and man-made landscapes correlate with what will be HE Policy objectives. In March 2022, DAERA announced the publication of the Future Agricultural Policy. All land managers with three or more hectares of eligible agricultural land who meet the scheme requirements will be able to participate; participants will be required to comply with the new Farm Sustainability Standards and participate in the Soil Nutrient Health Scheme package will have an outcome based approach and will focus on creating and restoring habitats that are important for species diversity. Protected zones around monuments for example already make a strong contribution to this objective, but are not currently viewed in this light. HE Policy can support and suggest partnering with DAERA to support cross-compliance opportunities to protect and enhance heritage assets in farmland, forests, and woodlands.		
Northern Ireland Peatland Strategy 2022-2040 ¹⁵⁰	there is now an increasing focus on peatland conservation and restoration and an appreciation of the ecosystem services that they provide. Peatlands are categorised as having 'Ecosystem Services' These include: <i>'Peatlands Ecosystem Services:</i> <i>Climate regulation and adaptation (carbon capture and storage)</i> <i>Unique biodiversity & habitat for wildlife</i>	Risks to heritage assets due to maladaptation include Peatland restoration works which carry the risk of inadvertent harm to both designated and undesignated heritage assets, including those not yet identified. Evidence from individual case studies highlights failure to consider heritage assets in peatland restoration can result in damage to archaeological remains. This risk has also been acknowledged through anecdotal reporting by agencies	✓	✓

¹⁴⁹ [Cross-Compliance | Department of Agriculture, Environment and Rural Affairs](#)

¹⁵⁰ [NI Peatland Strategy - Copy for EQIA Consultation. 8-8-2022. PDF 0.PDF](#)

	• <i>Drinking water filtration</i> • <i>Flood attenuation and water storage</i> • <i><u>An historical archive</u></i> • <i>Areas for recreation and understanding of our cultural heritage</i> • <i>Food production'</i>	including Historic England, Historic Scotland, and Bord na Móna. Heritage can also help us build resilience, understand how people and places have responded to climatic events through history and tell the story of climate change, for example through the study of peatlands. HE Policy will highlight the need to manage peatlands in a way which creates economic benefits whilst understanding and protecting them as a resource to learn about the past.		
UK Forestry Standard (UKFS) ¹⁵¹	The UK Forestry Standard (UKFS) is the technical standard for sustainable forest management across the UK, and applies to all woodland, regardless of who owns or manages it. The UKFS covers important elements of sustainable forest management, including: • biodiversity • climate change • historic environment • landscape • people • soil • water Forest Research's provides technical and practice guides and notes¹⁵², including guidance on practical management of the historic environment in the context of woodlands, understanding the social and cultural values of trees outside of woodlands in peri-urban and	A project¹⁵³ that reviewed the existing and potential role of cultural values in forest planning was undertaken in 2009/10 and included field work and interviews conducted over a 6-month period. A typology was created to differentiate between what the visitor brings to the woodland, what can be enhanced through contact with the site or site management and the benefits that can accrue from this interaction. Archaeological remains and historic features were identified as being intrinsic to sites, and therefore had the potential to be enhanced and conserved through site management. It is this interrelationship of protection and benefit that HE Policy will support.	✓	✓

¹⁵¹ [The UK Forestry Standard - GOV.UK](#)

¹⁵² [The UK Forestry Standard - Forest Research](#)

¹⁵³ [Culture and heritage - Forest Research](#)

	rural settings and guidance on managing forests which grow over peatlands.			
Clean Air Strategy for Northern Ireland ¹⁵⁴	<i>'In Northern Ireland, we face similar issues with air pollution to the rest of the UK and Europe - most notably, levels of nitrogen dioxide found in urban centres, arising principally from road traffic, in particular, diesel engines. In addition to this, we have problems with emissions from household heating and from agriculture. This document represents a comprehensive review of air quality policy and legislation in Northern Ireland and invites views on possible solutions to take forward. Some of these solutions may be related to decarbonisation of the energy sector.'</i>	Clean air can be related to access – how people – both local and visitors - get to and from heritage places. There are also considerations when disturbing for example below ground archaeology. HE Policy will emphasise the inter-relationship of one activity with another in terms of the environment – emphasising the need for best practice as an overarching sustainable development goal.	✓	✓

¹⁵⁴ <https://www.daera-ni.gov.uk/sites/default/files/consultations/daera/20.21.066%20Draft%20Clean%20Air%20Strategy%20for%20NI%20-%20Public%20Discussion%20Doc%20Final%20V6.PDF>

4.13 Part 2 – Air, Water and Soil - Environmental Characteristics

SEA topic	SEA Objective
Air, Water and soil	• limit water pollution to levels that do not damage natural systems • maintain water abstraction, run-off and recharge within carrying capacity (including future capacity) • reduce contamination, and safeguard soil quality and quantity • minimize waste, then re-use or recover it through recycling, composting or energy recovery • maintain and restore key ecological processes (e.g. hydrology, water quality, coastal processes) • limit air pollution to levels that do not damage natural systems

4.13.1 Air - Existing Baseline

- In 2022, Northern Ireland's greenhouse gas emissions were estimated to be 21.3 MtCO₂e, a reduction of 26 per cent since 1990 baseline levels.
- A comprehensive summary of air pollution in Northern Ireland is available from DAERA. Annual mean concentration of nitrogen dioxide (NO₂), 2011 – 2024. From 2021 to 2024, emission levels have remained at a similar concentration. This indicator is used as a wellbeing framework indicator in the latest Programme for Government (PfG) 2024-2027.

4.13.2 Water - Existing Baseline

- The marine life in the seas surrounding Northern Ireland is rich and varied and includes marine mammals such as harbour seals, whales, dolphins, seabirds, waterfowl and other species that migrate here. The majority of Northern Ireland's 650 km of coastline is protected for its special interest and several of our coastal species and habitats are recognised as internationally important.
- Northern Ireland has already exceeded the aim to designate 30 per cent of its marine area for protection by 2030 (known as "30x30"), with 38 per cent of our waters falling within the existing Marine Protected Area (MPA) network.

- Of the twenty-five inshore coastal waterbodies delineated in Northern Ireland, 13 (52%) have been assessed at good or better ecological condition.
- Four out of nine designated shellfish water protected areas (SWPAs) complied with the Water Framework Directive Guideline E. Coli standard in Shellfish Flesh in 2024.
- DAERA has been working on a range of initiatives with stakeholders to further develop effective management for MPAs including:
 - In December 2024 DAERA published its Report on the Northern Ireland Inshore MPA Network 2019 – 2024, detailing the current MPA network status, management approaches, and future recommendations.
 - In a process beginning in 2022, Northern Ireland’s first Blue Carbon Action Plan was co-designed with stakeholders alongside a review of the MPA Strategy. Developed with stakeholders, these policies aim to protect, restore and where possible create habitats that are natural carbon stores, and to improve the condition of protected features.
 - The Seabird Conservation Strategy and the Elasmobranch Conservation Strategy were consulted on in Winter 2024. Alongside the Blue Carbon Action Plan 2025-2030 and the MPA Strategy they form part of a suite of policies delivering for marine nature recovery.
 - The Environmental Improvement Plan for Northern Ireland was published in September 2024, and provides the overarching context for the action plans and strategies detailed above. It’s intended that all work will be in full alignment with the Marine Plan for Northern Ireland, once adopted.
- In 2024/25, 5 % of features within Marine and Terrestrial protected sites were in Favourable condition while 38% were in Unfavourable condition.
- Waterways Ireland manage almost 1,100 km of navigation channels across ROI and NI including 350 km of man-made canals that are over 200 years old. They use 176 locks to enable navigation throughout the waterways and manage 348 fixed, swing and lifting bridges, 157 locks and 56 weirs around Ireland in a connected network, much of which is scheduled or listed in NI.
- The location of known Marine Heritage assets is available on a spatial dataset (HED Map Viewer)
- There were 23 Marine licensing applications in 2023-24.
- The Independent Assessment used to help inform the third UK Climate Change Risk Assessment¹⁵⁵ (CCRA3) assesses 61 risks and opportunities from climate change to Northern Ireland, including to business, infrastructure, housing, the natural environment, our health and from the impacts of climate change internationally.
- Potential sources of data for the Northern Ireland marine area include:
 - Marine Mapviewer¹⁵⁶ - Department of Agriculture, Environment and Rural Affairs

¹⁵⁵ [third UK Climate Change Risk Assessment](#)

¹⁵⁶ [Marine Mapviewer | Department of Agriculture, Environment and Rural Affairs](#)

- Northern Ireland Environmental Statistics Report 2025¹⁵⁷ - Department of Agriculture, Environment and Rural Affairs
- Marine Strategy¹⁵⁸ - Department of Agriculture, Environment and Rural Affairs
- NI Coastal Vulnerability Assessment Physical Assets¹⁵⁹ - Datasets - Open Data NI
- Baseline Study and Gap Analysis of Coastal Erosion Risk Management NI¹⁶⁰ - Department for Infrastructure

4.13.3 Soil - Existing Baseline

- Northern Ireland has a wealth of geological features including the World Heritage site at the Giant's Causeway. This site has historic and cultural value connected to its geology, folklore and local traditions. The Natural Stone Database¹⁶¹ in NI describes the connection between local stone types and building stone across NI.
- In 2024/25, 502 hectares of new woodland was planted, including 75 hectares planted on land recently acquired by Forest Service and 427 hectares of new woodland supported with Forestry Grant Schemes.
- Agri-environment schemes encourage farmers and landowners to manage their land to benefit the environment. This is a growing trend - for example, organically grown flax, which is used as a roofing material in thatched roofs, is making a 'comeback'.¹⁶²
- At the end of 2024, 59,000 hectares of land in Northern Ireland were under agri-environment scheme (EFS) agreement. The EFS has been designed to address specific environmental needs, primarily related to biodiversity, climate change and water quality. It is targeted and prioritised to deliver maximum environmental benefit and value for money. The EFS has three levels:
 - A Higher Level, primarily for environmentally designated sites - Special Area of Conservation [SAC], Special Protection Area [SPA], RAMSAR, biological Areas of Special Scientific Interest [ASSI] and for priority habitats and species;
 - A Wider Level to deliver benefits across the countryside, outside of environmentally designated areas; and
 - A Group Level to facilitate co-operative action by Wider or Higher level farmers in specific areas such as environmentally designated areas, priority habitats, or river catchments.

¹⁵⁷ [Northern Ireland Environmental Statistics Report 2025 | Department of Agriculture, Environment and Rural Affairs](#)

¹⁵⁸ [Marine Strategy | Department of Agriculture, Environment and Rural Affairs](#)

¹⁵⁹ [NI Coastal Vulnerability Assessment Physical Assets - Dataset - Open Data NI](#)

¹⁶⁰ [Baseline Study and Gap Analysis of Coastal Erosion Risk Management NI | Department for Infrastructure](#)

¹⁶¹ [Stone Database NI](#)

¹⁶² [Flax: The historic plant making a comeback - Sustainable NI](#)

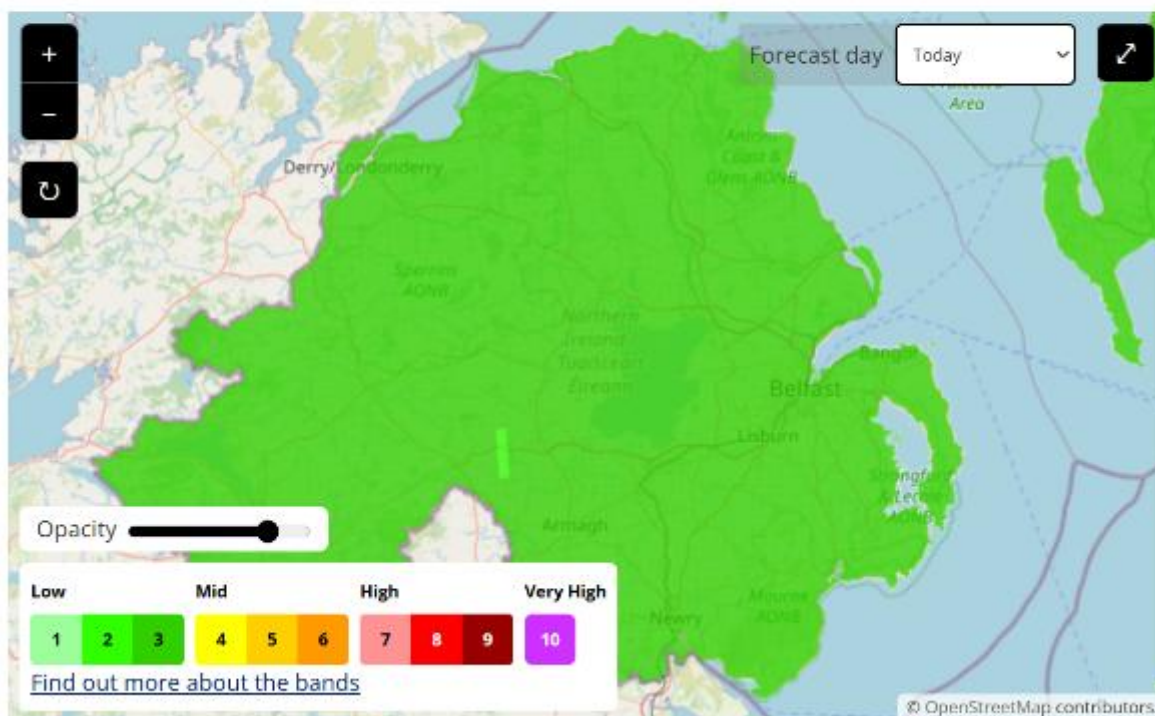
The images below give an indication of the breadth and location of Air, Soil and Water Assets in Northern Ireland.

Fig 22 - Air quality monitoring map – Northern Ireland Air¹⁶³

Air pollution forecast map

Current measured levels are shown in the table below - showing concentrations and, where applicable, the corresponding index and bands.

» [Switch to the 24 hour summary](#)



¹⁶³ [Air pollution forecast map - Northern Ireland Air](#)

In Northern Ireland the full range of rock types (igneous, sedimentary and metamorphic) have been used as building stone since Neolithic times. As transport systems developed in the 19th and 20th centuries, stone was moved further around the country as well as being shipped in from further a field for construction of the more prestigious buildings such as town halls, churches and banks. Belfast's built heritage has a full range of Scottish Carboniferous sandstones and English Jurassic limestones used from the mid-19th century.

The Geology Map and Key (supplied by Geological Survey of Northern Ireland) provide a simplified geology of Northern Ireland and the Table summarised the main rock types used as building stone in Northern Ireland that is referred to in the website.



Fig 24 - Showing extent of Peatlands in the Sperrins (Crown Copyright)

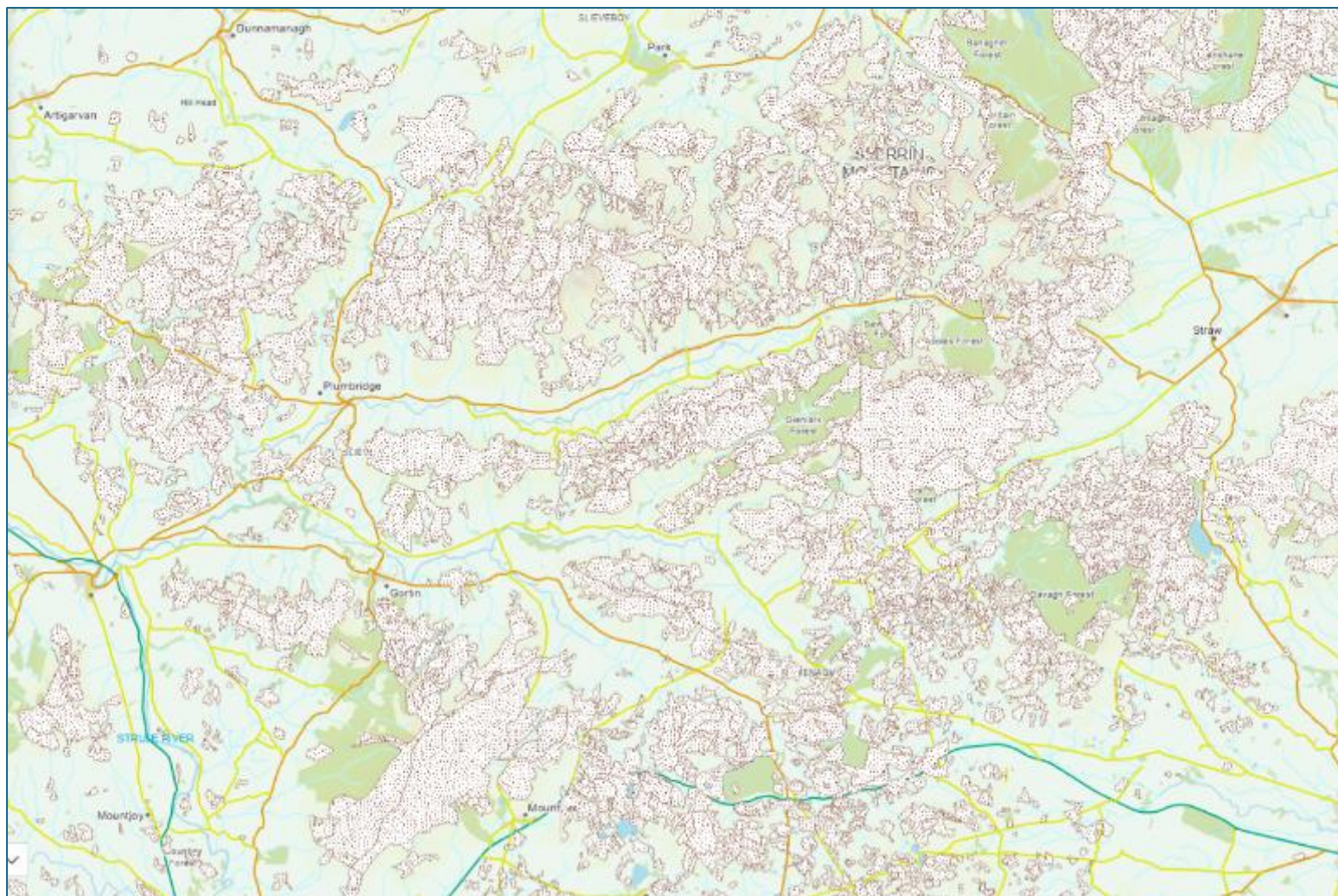


Fig 25 - Areas of Significant Archaeological Interest – HERoNI HED Map Viewer (Crown Copyright)

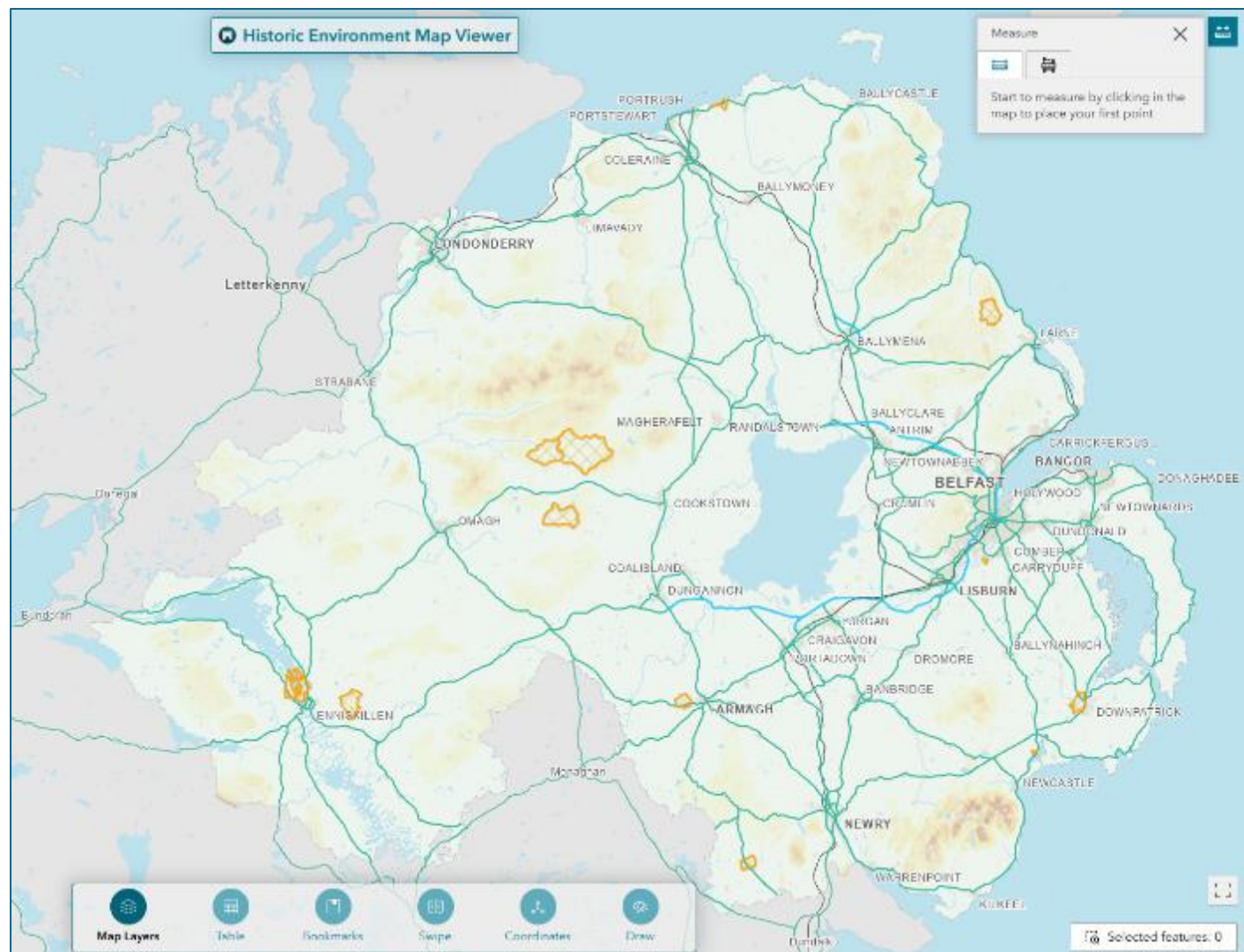
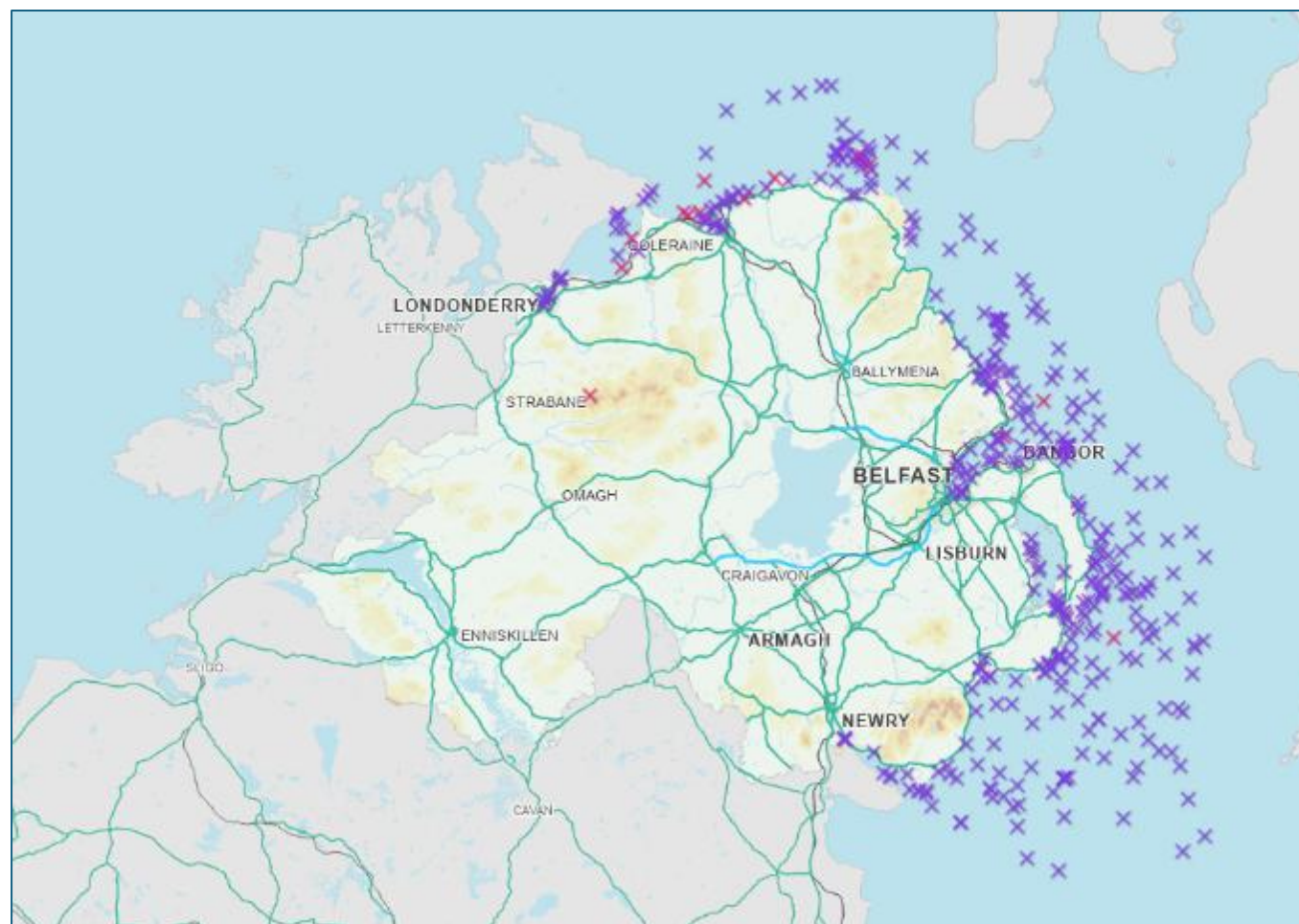


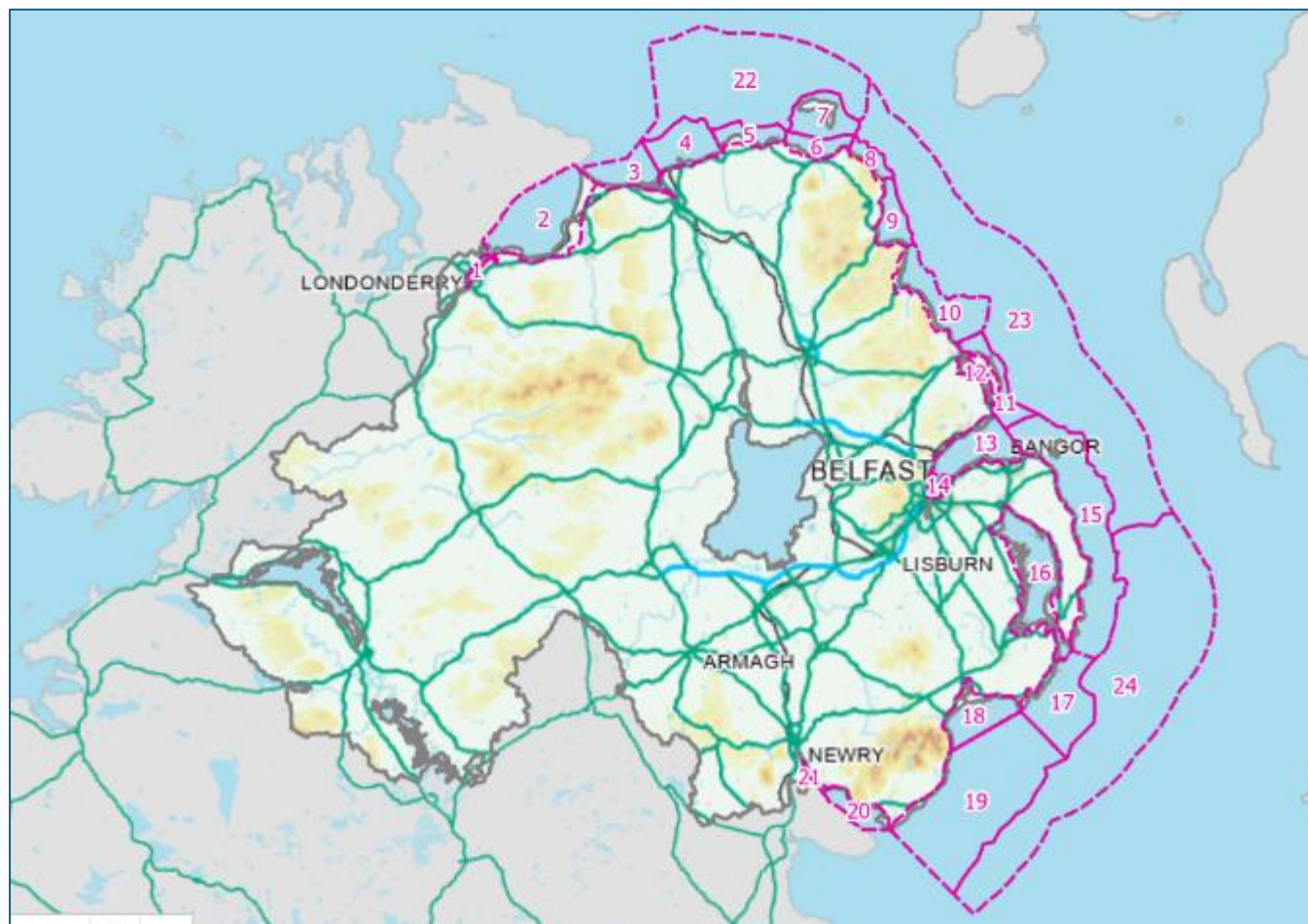


Fig 27 – Ship and Aircraft Wrecks – HERoNI HED Map Viewer¹⁶⁵ (Crown Copyright)



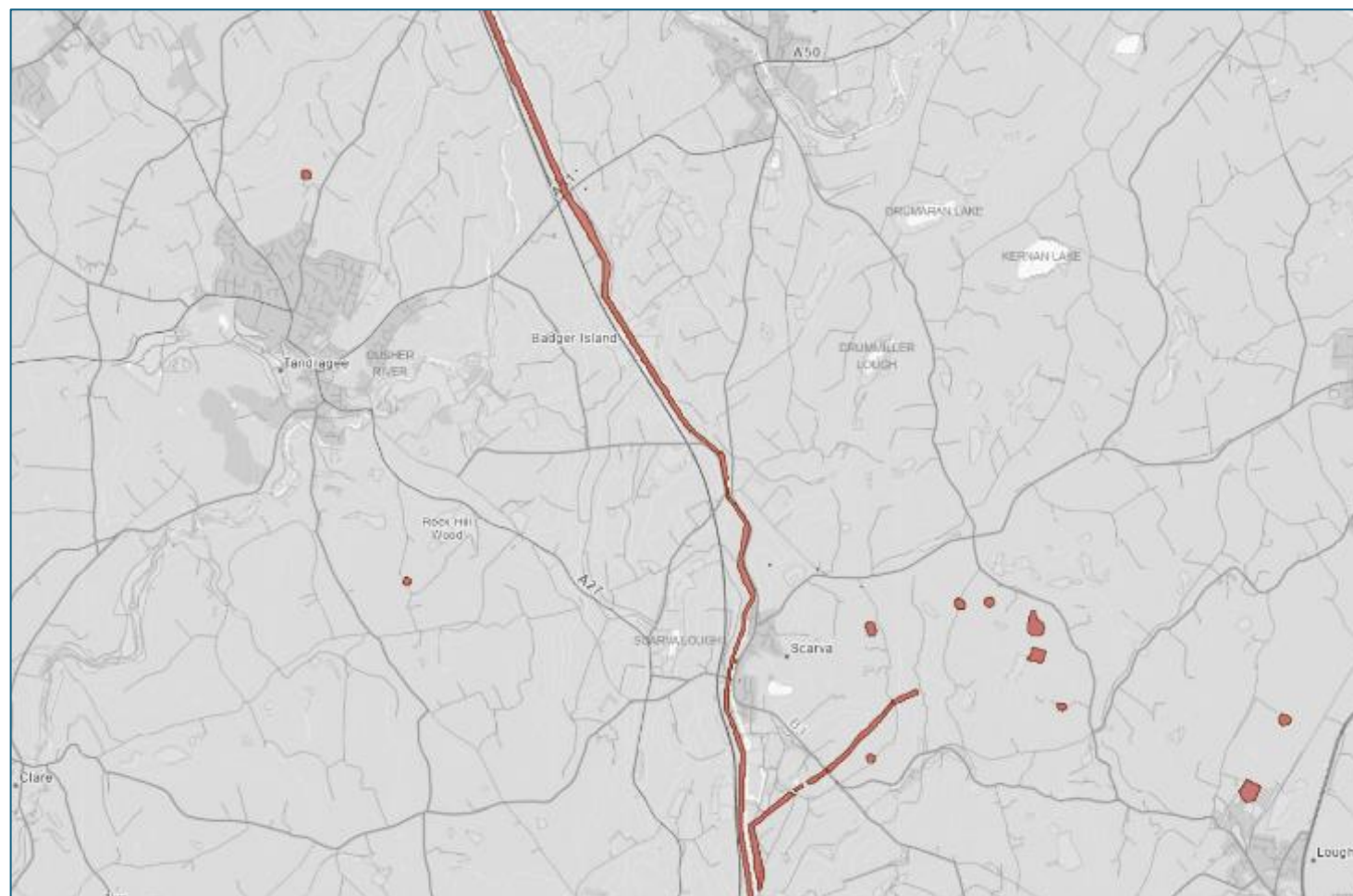
¹⁶⁵ [Historic Environment map viewer](#) | Department for Communities

Fig 28 - Map showing areas of seascape character - (NIEA NI Natural Environment Map Viewer ¹⁶⁶– Copyright)



¹⁶⁶ [Natural Environment Map Viewer](#) | Department of Agriculture, Environment and Rural Affairs

Fig 29 - Example of Scheduled Ulster Canal Network– HERoNI HED Map Viewer¹⁶⁷ (Crown Copyright)



¹⁶⁷ [Historic Environment map viewer](#) | Department for Communities

4.13.4 Air, Water and Soil - Environmental problems

Air

In Northern Ireland, air pollution occurs as a result of road transport, household burning of solid fuel, agriculture and industry. Higher levels of pollution have a negative impact on human health.

Water

In Northern Ireland, water related environmental problems mainly come from agriculture, industry and climate pressures – ie flooding, algae and sea level rises. There is evidence of habitat loss and biodiversity decline – for example pollution and land drainage has degraded freshwater habitats such as in Lough Neagh, threatening animals and plants

Soil

In Northern Ireland, soil related environmental problems include:

- soil erosion (due to overgrazing/peat being drained)
- nutrient enrichment (fertilisers) building up in soils and leaching into rivers and lakes
- loss of peatlands / carbon storage (NI's peatlands are globally important)
- contamination due to agricultural practices
- loss of habitat / bio-diversity due to conversion into farmland or agricultural practices
- climate change pressures causing erosion, flooding and leaching of nutrients, fires

4.14 Part 3 – Natural Places – HE Policy Impact

SEA topic	SEA Objective
Landscape	• protect and enhance the landscape everywhere and particularly in designated areas • value and protect diversity and local distinctiveness • improve the quantity and quality of publicly accessible open space
Biodiversity, Flora and Fauna	• avoid damage to designated wildlife and geological sites and protected species • maintain biodiversity, avoiding irreversible losses • restore the full range of characteristic habitats and species to viable levels • reverse the long term decline in farmland birds • ensure the sustainable management of key wildlife sites and the ecological processes on which they depend • provide opportunities for people to come into contact with and appreciate wildlife and wild places
Air, Water and soil	• limit water pollution to levels that do not damage natural systems • maintain water abstraction, run-off and recharge within carrying capacity (including future capacity) • reduce contamination, and safeguard soil quality and quantity • minimize waste, then re-use or recover it through recycling, composting or energy recovery • maintain and restore key ecological processes (e.g. hydrology, water quality, coastal processes) • limit air pollution to levels that do not damage natural systems

4.14.1 Potential impact of HE Policy on Natural Places

Landscapes and Seascapes

- Implementation of HE Policy is unlikely to have significant negative effects on Northern Ireland's landscapes and seascapes.
- The protection of heritage assets contributes to **landscape character, local distinctiveness and scenic value**; there is potential for positive impacts on the baseline condition of Northern Ireland's landscape character and scenic value when considered alongside the protection of the historic environment
- The historic environment is **central to the ecological and cultural diversity of landscapes**; like geology, (often visible in local building stone and stone walls) it creates a sense of **place and local identity**; understanding and incorporating it into policy reinforces the special character of landscapes - these links between cultural and natural landscapes are recognised for example through Landscape Character Assessments, Seascape Character Assessment Areas and Landscape Partnerships
- The significance of a heritage asset can be impacted by **changing or enhancing the environment** or local conditions, for example field and settlement patterns, or by changing **setting, legibility or visibility of heritage assets in a landscape** – for example planting schemes for forestry and upstanding archaeology - the two can work together
- Vernacular and industrial heritage are at particular risk in Northern Ireland – HE Policy which can support the sustainable use of historic farmsteads to understand, protect it and address decline could be key to quality of rural and marine landscapes
- HE Policy creates opportunities **to invest in the care of and highlight the historic environment as a resource to animate landscapes and natural places, opportunities to enhance wellbeing and recreation and the resulting health benefits.**
- Heritage Assets and historic landscapes and features can be **identified, celebrated and enhanced** through local council Local Development Plans¹⁶⁸, currently under development.
- Plants and ecology have shaped the historic environment particularly the vernacular historic environment; HE Policy offers opportunities to amplify the **relationships between the historic environment, distinctive places and landscapes** which are interwoven with locally distinct geology, agricultural practises/marine industry or conditions which have led to traditional roof or vernacular forms or use of materials and crafts for example.
- Protection of the historic environment through HE Policy can also **contribute to protection of intangible cultural heritage** - traditional land-use practices, oral histories, placenames for example.

¹⁶⁸ [Local Development Plans – Departmental Directions – Plan Strategies | Department for Infrastructure](#)

- HE Policy can support opportunities to help people to **celebrate identity and local distinctiveness**, connecting the historic environment, distinctive places, species of plants or animals and seascapes may be lost – these are interwoven when contributing to local cultures and distinctiveness, supporting local people and visitors through tourism.
- **Urban Natural places can be protected through HE Policy**: Historic Parks, Gardens and Demesnes, the protected setting of Listed Buildings and Monuments provide opportunities for urban green infrastructure such as green corridors and urban sustainability zones.
- Given the widespread, diverse location and character of historic landscapes, HE Policy can support **inclusive access to natural and historic places, especially for underrepresented communities**. This could align with **health and wellbeing outcomes** and support broader Programme for Government goals.
- HE Policy has the potential to positively affect the character and/or setting of designated sites in Northern Ireland. For example, effect on Landscape Character Areas or AONBs [including (1) Binevenagh; (2) Causeway Coast and (3) Antrim Coast and Glens]. This is likely to be positive as outlined above.
- HE Policy has the potential to affect landscape, seascapes and visual amenity of the Northern Ireland north coastal and Rathlin Island area. This is likely to be positive as outlined above.
- HE Policy has the potential to affect the 24 Regional Seascape Character Areas. This is likely to be positive as outlined above.

Biodiversity

- Implementation of HE Policy is **unlikely to have significant negative effects** on Northern Ireland's biodiversity.
- Currently, spatial mapping exists which could provide a picture of the contribution of protected areas such as scheduled monument zones within for example farmland or Historic Parks and Gardens to biodiversity. This information cannot yet be collated, though work is underway to do so.
- Work is underway through the HED digital transformation to access statistics on climate change impacts to historic monuments, and the potential to use **monuments in agricultural landscapes as biodiversity areas** by the Historic Environment Division of Department for Communities.
- **Historic routes, designed landscapes and other heritage assets are often wildlife rich sites** which, appropriately managed, can act as important links in a national biodiversity network – for example pollination networks – supporting ecosystem services.
- The historic environment by nature of its **conservation and protection supports biodiversity**, contributing to a range of habitats, and influencing land use; there is potential for positive impacts on the baseline condition of Northern Ireland's natural environment when considered alongside the protection of the historic environment

- By integrating the approach between air, soil and water and historic assets it is possible to preserve heritage and contribute to mitigation in tandem – for example through good advice on the use of renewable energy in historic settings – a potential synergy with good design as emphasised in the Architecture and Built Environment Policy, and outcome for example with the Clean Air Strategy
- **Heritage assets and historic landscapes are also habitats, (for example bats, a protected species, are commonly found in protected structures);** their characteristics will often dictate what species can and can't thrive; the historic environment can help to understand whether certain habitats and species will prosper and inform decisions about restoration options and appropriate management.

Soil

- Implementation of HE Policy is unlikely to have significant negative effects on Soils in Northern Ireland. With 80% of the 1.4 million hectares of land in Northern Ireland in agricultural use¹⁶⁹, it's unsurprising that the majority of archaeological and heritage features are found on farmland¹⁷⁰; however measures are in place in respect of ensuring preservation of archaeological features on agricultural land through Cross Compliance Standards for farming – an example of two complimentary outcomes
- Caring for protected historic monuments on farmland which are an important repository of biodiversity and carbon capture on peatland **contributes towards the protection and management of land as well as flora and fauna**; HE Policy can support people to care for their special landscapes - whilst supporting the need for them to use their land for example through the EFS scheme
- Protected zones around heritage assets may passively or actively help to create **green 'corridors' or green/blue networks**
- Soils can have protections through designation as scheduled monuments or landscapes, and they have synergistic relationships with Archaeology and other heritage assets through for example protecting archaeological reserves and maintaining a balanced hydrology.
- There is opportunity to grow and produce organic building materials for example for thatching as part of a sustainable economy – affecting soil and ecology
- Climate change and/or development may exacerbate soil (which includes seabed sediments) erosion through extreme weather events or development causing currents to be re-directed and causing scouring; loss of these protective sediments could exacerbate impacts on marine historic environment assets and therefore policies to manage and protect these assets could have a positive effect on underwater and intertidal zones for example efforts to mitigate against climate change such as the **restoration of peatlands**; the loss of this protection could exacerbate impacts on marine historic environment assets.

¹⁶⁹ [Protecting historic monuments on farmland | Department for Communities](#)

¹⁷⁰ [Our Five Aims - Archaeology 2030](#)

Water

- Implementation of HE Policy is unlikely to have significant negative effects on the Northern Ireland transboundary marine and coastal environment, including but not limited to Northern Ireland marine biodiversity, flora, fauna, climatic factors, marine heritage (exacerbating damage to marine heritage from storms/increased erosion) and landscape/seascape.
- HE Policy is likely to have a positive effect on the marine environment in NI, by **supporting an integrated approach between protection of terrestrial and marine heritage assets and biodiversity potential – underpinned by research and knowledge**
- The protection of heritage assets contributes to **seascape character, local distinctiveness and scenic value** on coasts and intertidal zones, as well as islands for example Rathlin Island.
- HE Policy can support and promote **marine cultural landscapes - the interconnectedness of submerged heritage, coastal communities, and traditional maritime practices; HE Policy could support integrated coastal zone management through cultural landscape approaches, in the model of landscape partnerships.**
- Most of Northern Ireland's historic canal infrastructure is now protected through scheduling; these features and their future conservation may, alongside millraces, other heritage waterways/waterbodies, and historic parks and gardens have **a role in relation to considerations of water flow, and flooding**
- An emphasis on research and implementation of **climate change adaptation** in HE Policy applies also to the Marine landscape and seascapes, with the potential for positive effects

4.14.2 Potential Negative Impacts and Mitigation – Natural Places

- **Potential Effect:** increased access to historic places may have a slight negative impact for example through increased traffic or footfall, or higher demand for access to protected wreck sites. Increased air pollution could result from increased traffic/access to historic sites; biodiversity and habitats could be affected by an increase in footfall or access to heritage assets in natural protected zones.
- **Mitigation:** Visitor Impact Management could be monitored through policy support for capacity studies, visitor impact assessments, or site management plans. This could include HE Policy strategic-level support for developing heritage site management frameworks that include visitor pressure mitigation.
- **Mitigation:** Given the controls and licensing required for access and the development permissions required by the SPPS for protected areas, this should not be a threat. The higher level of protection of the settings around heritage assets, provide a more stringent protection through development controls like Listed Building and Scheduled Monument consents, and the removal of permitted development rights associated with protected structures meaning that consultation is required. However, it may also be possible to monitor visitor numbers periodically to note any increase and react accordingly. Managing carbon expenditure through carbon auditing and infrastructure considerations which emphasise that public transport can be considered when developing or enhancing access HE Policy suggests the *‘management of heritage assets in the face of environmental problems*.
- **Potential Effect:** aerial emissions can occur where for example archaeological sites are disturbed to retrieve artifacts or use of equipment on sensitive sites e.g. peat disturbance may result in carbon being released; there are also considerations when disturbing for example below ground archaeology - there is potential for some carbon being released into the air and for soils being impacted through large scale archaeological excavations
- **Mitigation:** the ‘Environmental Good Practice Guide for Archaeological Excavations¹⁷¹’ considers the potential environmental impacts of archaeological excavation including the potential for water pollution if inappropriately managed. HE Policy will emphasise best practice and the inter-relationship of one activity with another in terms of the environment – emphasising the need for best practice as an overarching sustainable development goal; the Peatlands Strategy NI acknowledges the relationship and encourages management between the effects of the restoration of peatlands and the potential for archaeological discovery
- **Potential Effect:** potential demand for lime and the use of local lime kilns could result from a resurgence in this material for mortars or renders, however it is unlikely that the scale of any increase would sufficiently result in a significant demand for local limestone

¹⁷¹ [Environmental Good Practice Guide for Archaeological Excavations | The Northern Ireland Executive](#)

- **Potential Effect:** with repair of local historic buildings could come a demand for stone – local stone from local quarries. It is unlikely that the scale of any increase would sufficiently result in a demand for local stone to such a degree as to make re-opening of quarries viable. It is often the case that stone with similar appearance and properties is matched to the original.
- **Potential Effect:** there is a risk that cumulative or indirect impacts (e.g. multiple small developments affecting landscape character or biodiversity over time) may have a negative effect.
- **Mitigation:** Monitoring and assessment through heritage and/or environmental auditing¹⁷² could be carried out firstly as a benchmark, then as a monitoring tool, supported by HE Policy which has safeguarding as one of its core aims.

Protected Habitats

- **Potential Effect:** HE Policy is not directly connected to the conservation of any Protected Natural Sites, however as a plan which covers most geographical areas including protected landscapes, it has the potential to impact on habitats and species for which Special Areas of Conservation (SAC) and Special Protection Areas (SPA) have been designated. In acknowledgement of this, early consideration has been given to the need for **Appropriate Assessment** (AA) and a Habitats Assessment Screening has been carried out in parallel to the SEA Scoping. HE Policy aims will have a positive impact on historic places and assets, and therefore as it is highly unlikely that HE Policy will have any negative effects on SCAs or SPAs.
- **Mitigation:** If located within or near UK National Site Network sites, enhancement or enhanced access to buildings, sites, monuments, submerged wrecks and below ground archaeology would all be subject to planning and development guidance and controls which fall under Regional Development Strategy (RDS), the Strategic Planning Policy Statement (SPPS) the Planning Act (NI) 2011, Historic Monuments and Archaeology Order 95 and the Protected Wrecks Act (1973). Consultation guidance which highlights the consideration of habitats can be added to any Historic Environment strategies and/or guidance which will flow from HE Policy. The main control over adverse impacts on habitats would be permissions required under the Habitats and Regulations Act which control any significant effects on UK National Site Network Sites at a project specific level.

¹⁷² [Heritage asset audit | Department for Communities](#)

4.14.3 Likely Impact without HE Policy:

- Without HE Policy, further decline in condition of the historic environment will impact the character and condition of landscapes and seascapes, potentially including habitats.
- Without HE Policy, opportunities to invest in the care of and highlight the historic environment as a resource to animate landscapes and natural places may be lost, missing opportunities to enhance wellbeing and recreation and the resulting health benefits.
- Plants and ecology have shaped the historic environment particularly the vernacular historic environment; opportunities to amplify the relationships between the historic environment, distinctive places and landscapes which are interwoven with locally distinct geology, agricultural practises/marine industry or conditions which have led to traditional roof or vernacular forms or use of materials and crafts for example (also lined to intangible cultural heritage) may be lost.
- Without HE Policy the opportunity to conserve, protect or enhance the historic environment as part of landscapes and seascapes which give people access to characterful places may be lost for example through former industrial heritage and ports as well as natural spaces which contain monuments and upstanding archaeology.
- Without HE Policy, opportunities to help people to celebrate identity and local distinctiveness, connecting the historic environment, distinctive places, species of plants or animals and seascapes may be lost – these are interwoven when contributing to local cultures and distinctiveness for tourism may be lost.

4.15 Part 4 - Suggested HE Policy Aims – Natural Places

4.15.1 Policy Aim 5: Aligning the care of heritage assets with distinctive places, landscapes and seascapes, supporting biodiversity

Alternatives:	• Do-nothing/Business as Usual – A number of landscape partnerships in Northern Ireland currently deliver fixed-term projects that combine heritage activity with community and environmental initiatives. While valuable, these projects rely on short-term funding and operate in isolation. Without an overarching strategic framework, activity remains fragmented, time-limited and unable to deliver long-term, targeted or measurable outcomes. This approach does not provide the integrated, coordinated action required to support landscapes, biodiversity and heritage at scale.
Selection:	Policy Aim : Aligning the care of heritage assets with distinctive places, landscapes and seascapes supporting biodiversity • HE Policy has the potential to deliver wide-ranging positive impacts across towns, rural areas, seascapes, and agricultural and vernacular landscapes by strengthening the protection, maintenance and restoration of historic places and their settings. • A policy approach that recognises the value of quality places across administrative boundaries—and balances protection with the social, environmental and economic benefits these places generate—offers a coherent, long-term and cross-government strategy. This is the preferred option for achieving this Policy Aim. • Northern Ireland’s landscapes have been shaped by thousands of years of human activity. The distinction between natural and built environments is therefore blurred. There is growing emphasis on managing those places to best recognize and support the interconnected character of natural and cultural values¹⁷³. HE Policy will support management approaches that reflect this interconnected character, helping people to care for their landscapes while also enabling sustainable land use. • Northern Ireland’s marine environment contains thousands of historic sites¹⁷⁴, including coastal defence¹⁷⁵ sites formed through conflict, settlement and industry. Rising sea levels pose emerging risks. HE Policy can help anticipate and respond to these changes. • HE Policy can promote inclusive access to natural and historic places, ensuring that underrepresented communities benefit from opportunities to experience and engage with these environments.

¹⁷³ [ICOMOS’ Work on Connections between Culture and Nature - International Council on Monuments and Sites](#)

¹⁷⁴ [Marine historic environment | Department for Communities](#)

¹⁷⁵ [Defence Heritage | Department for Communities](#)

	• HE Policy can also provide strategic support for participatory heritage management in natural places, strengthening local stewardship, resilience and community involvement. • HE Policy could provide a strategic commitment to data development and integration, e.g. biodiversity mapping of heritage assets, climate vulnerability assessments. • In tandem with plans like the Northern Ireland Environmental Improvement Plan¹⁷⁶, HE Policy can strike a balance between identification, conservation and a recognition that our coasts, landscapes and waterways are key to tourism and recreation so that future generations can also access, understand, enjoy and use them.		
Potential for Monitoring: HEADLINE METRICS	• SUSTAINABLE DEVELOPMENT - Proportion of historic environment planning consultations that gained approval New Stat - Data capture to monitor land use cover for historic monuments in respect of biodiversity • New Stat - Number of heritage assets contributing to biodiversity corridors		
Potential for Monitoring: SUPPORTING METRICS	• New Stat - Number of recorded heritage assets in Green or Blue infrastructure plans (DAERA)/Number of heritage landscapes contributing to flood mitigation, pollination, etc • New Stat - Number of heritage trails in NI (NITB)/ % of urban heritage assets integrated into green infrastructure plans • New Stat – Number of heritage assets in SCAs or SPAs, ASSIs and AONBs (DAERA) • New Stat – Contribution of Marine Heritage to Marine Strategy Framework Directive indicators (MSFD) • Number of community climate projects involving heritage assets		
Effects on SEA Objectives:	Material Assets	++	HE Policy strengthens the protection, maintenance and reuse of historic assets and their settings.
	Landscape	++	HE Policy supports protection, appreciation and access to distinctive landscapes and seascapes
	Population / Health	+	HE Policy supports enhanced quality places and natural settings contribute to wellbeing, enjoyment and learning.
	Climatic Factors	+	HE Policy supports protecting and reusing assets carbon savings and climate-resilient landscapes
	Biodiversity, Flora, Fauna	+	Heritage controls (e.g. around monuments) can enhance habitats and support biodiversity.
	Air, Soil and Water	+	HE Policy supports natural carbon sinks and improved land/water management (e.g. flood mitigation).
	Cultural Heritage	++	HE Policy creates strong positive effects through improved protection, awareness and access to heritage. and access.

¹⁷⁶ [Environmental Improvement Plan for Northern Ireland | Department of Agriculture, Environment and Rural Affairs](#)

5 Planet

5.1 Part 1 - Climatic Factors – Relationship with other plans, programmes and strategies

Sea Topic - Climatic Factors				
Protection Relevant legislation: Climate Change Act (Northern Ireland 2022)¹⁷⁷				
International Convention, declaration or charter	Legislative basis, environmental objectives or requirements of the plan or programme	How objectives and requirements of other plans or programmes might be taken on board in Historic Environment Policy (HE Policy) or how HE Policy might impact other plans, policies or programmes	Impacts on HE Policy	HE Policy may Impact outcomes
United Nations Framework Convention on Climate Change (UNFCCC) (1994) And the Kyoto Protocol (1997)	This convention is legally binding. The UK ratified this Convention in 1992. The ultimate objective of the Convention is to stabilize greenhouse gas concentrations "at a level that would prevent dangerous anthropogenic (human induced) interference with the climate system." It states that "such a level should be achieved within a time-frame sufficient to allow ecosystems to adapt naturally to climate change, to ensure that food production is not threatened, and to enable economic development to proceed in a sustainable manner."	Historic Environment Policy aims will align with the objectives of this Convention through supporting and recommending the re-use and retrofit of heritage buildings to mitigate against the expenditure of carbon in construction and use.		

¹⁷⁷ [Climate Change Act \(Northern Ireland\) 2022](#)

	The Kyoto Protocol operationalizes the UNFCCC by committing industrialized countries and economies in transition to limit and reduce greenhouse gases (GHG) emissions in accordance with agreed individual targets. The Kyoto Protocol, like the Convention, is also designed to assist countries in adapting to the adverse effects of climate change. It facilitates the development and deployment of technologies that can help increase resilience to the impacts of climate change.			
United Nations Framework Convention on Climate Change (UNFCCC) Paris Agreement (2015) ¹⁷⁸	The UK ratified the Paris Agreement in 2016. The Paris Agreement provides a framework for governments as well as business and investors to keep global warming well below 2°C, pursuing efforts to limit the temperature increase to 1.5°C.	Historic Environment Policy aims will align with the objectives of this Convention through supporting and recommending the re-use and retrofit of heritage buildings to mitigate against the expenditure of carbon in construction and use.	✓	
Other plan/programme or strategy	Legislative basis, environmental objectives or requirements of the plan or programme	How objectives and requirements of other plans or programmes might be taken on board in Historic Environment Policy (HE Policy) or how HE Policy might impact other plans, policies or programmes	Impacts on HE Policy	HE Policy may impact outcomes
The Green Growth Strategy ¹⁷⁹	The Green Growth Strategy is the Northern Ireland Executive's multi-decade strategy, balancing climate, environment and the economy in Northern Ireland. It sets out the long-term vision for tackling the climate crisis in the right way.	HE Policy will support adaptation of and protection of heritage assets from the impacts of climate change, to sustain them for future generations, mitigating against climate change impacts. HE Policy will potentially underpin other climate change mitigation policies by recommending the adaptive re-use	✓	✓

¹⁷⁸ [UK climate action following the Paris Agreement - Climate Change Committee](#)

¹⁷⁹ [A Green Growth Strategy for Northern Ireland - Balancing our climate, environment and economy | Department of Agriculture, Environment and Rural Affairs](#)

	Green Growth Vision is for a net zero emissions, nature rich society where <i>‘we are reaping the economic, social, health and environmental benefits from a thriving green economy.’</i> Green Growth considers the wider environment as well as a green economy. The Green Growth approach advocates for tackling climate change, for example mitigating against impacts and reducing emissions of greenhouse gases.	of buildings to save carbon. There are further opportunities to use protected historic assets and their settings (such as monuments, buildings and parks, gardens and demesnes) to sustain and enhance biodiversity, which again, set out within HE Policy could influence other plans and strategies toward using their historic assets to meet Green Growth Strategy aims.		
UK Climate Change Risk Assessments¹⁸⁰ (CCRA) and Northern Ireland Climate Change Adaptation Plans¹⁸¹ (NICCAP)	The Climate Change Act (Northern Ireland) 2022¹⁸² (Act) sets a target of an at least 100% reduction in net zero greenhouse gas (GHG) emissions by 2050. There is a legal requirement on all Northern Ireland departments to exercise their functions, as far as is possible to do so, in a manner consistent with the achievement of the targets of the Act and carbon budgets set under it. Section 42 of the Act requires regulations to be made in regard to climate change reporting by public bodies. The type of information that public bodies may be reporting to DAERA is likely to include: • an assessment of the current and predicted impact of climate change in relation to the public body’s functions; • proposals and policies, with associated timescales, that the public body is bringing	Historic Environment Policy has the potential to shape environmental plans, policies, strategies and actions across the NI Executive which could positively impact climate change mitigation through the adaptive re-use of buildings to save carbon. There are further opportunities to promote and support use of protected assets and their settings (such as monuments, buildings and parks, gardens and demesnes) to sustain and enhance biodiversity – supporting a better environment. As advisors to other government departments through the Protocol for the Care of the Government Estate, HE Policy will be a tool for HED to guide other departments to use and re-use their heritage assets to mitigate against and adapt for climate change impacts – supporting a better environment. HE Policy aims will describe the framework against which how the Department for Communities cares for its own assets including State Care Monuments, to mitigate	✓	✓

¹⁸⁰ [UK Climate Change Risk Assessment 2022 - GOV.UK](#)

¹⁸¹ [Northern Ireland Climate Change Adaptation Programme | Department of Agriculture, Environment and Rural Affairs](#)

¹⁸² [Climate Change Act \(Northern Ireland\) 2022](#)

	forward for adapting to, or mitigating the effects of climate change; and assessments on the progress that the public body has made to implementing their proposals and policies.	against and adapt to climate change impacts and encourage biodiversity – supporting a better environment. HE Policy has been included in the NICCAP(3) as a means through which NI government is responding to climate change risks to : H11 Cultural heritage - [Coastal flooding, surface water flooding, windstorms and rainfall, ground movement, subsidence and weathering], H3 - People, communities and buildings – flooding, H5 - Building Fabric - Moisture, wind and driving rain, N18 – Landscape character and I4 – Bridges. HE Policy will advocate for the use of heritage assets which cover thousands of years to educate about NI’s changing climate over time. Heritage is a powerful vehicle to stress urgency about climate change in an emotive and engaging way.		
Northern Ireland Environmental Improvement Plan (EIP)¹⁸³	As noted above, the strategic objectives of the EIP include: • Zero waste and a highly developed circular economy, • Net zero greenhouse gas emissions and improved climate resilience and adaptability.	HE Policy will augment the EIP: through management and appreciation of the historic environment, as well as an emphasis on re-use and support for adaptation to climate change impacts, HE Policy supports to the EIP objectives to achieve: • Zero waste and a highly developed circular economy, • Net zero greenhouse gas emissions and improved climate resilience and adaptability.	✓	✓

¹⁸³ [Environmental Improvement Plan for Northern Ireland | Department of Agriculture, Environment and Rural Affairs](#)

Energy Strategy – Path to Net Zero Energy – the Department for the Economy¹⁸⁴	<i>‘The context for energy has changed substantially since the 2010 Strategic Energy Framework (SEF) was published. In June 2019 the UK became the first major economy to commit to a 100 per cent reduction in greenhouse gas emissions by 2050. This ‘net zero’ target represents a significant step-change in the commitment to addressing the climate crisis.’</i>	HE Policy aims will promote the re-use of buildings, contributing to a low-waste, low carbon society. They will also promote the skills and resources needed to support the green economy through retrofit and energy efficiency measures. The driest building is the most energy efficient – thus promoting the repair and maintenance of heritage buildings also promotes lower-energy living.	✓	✓
Northern Ireland Peatland Strategy 2022-2040¹⁸⁵	there is now an increasing focus on peatland conservation and restoration and an appreciation of the carbon sequestering that they provide. Peatlands are categorised as having ‘Ecosystem Services’ These include: <i>‘Peatlands Ecosystem Services:</i> • <i>Climate regulation and adaptation (carbon capture and storage)</i> • <i>Unique biodiversity & habitat for wildlife</i> • <i>Drinking water filtration</i> • <i>Flood attenuation and water storage</i> • <i><u>An historical archive</u></i> • <i>Areas for recreation and understanding of our cultural heritage</i> • <i>Food production’</i>	Risks to heritage assets due to maladaptation include Peatland restoration works which carry the risk of inadvertent harm to both designated and undesignated heritage assets, including those not yet identified. Evidence from individual case studies highlights failure to consider heritage assets in peatland restoration can result in damage to archaeological remains. This risk has also been acknowledged through anecdotal reporting by agencies including Historic England, Historic Scotland, and Bord na Móna. Heritage can also help us build resilience, understand how people and places have responded to climatic events through history and tell the story of climate change, for example through the study of peatlands. HE Policy will highlight the need to manage peatlands in a way which creates economic benefits whilst understanding and protecting them as a resource to learn about the past.	✓	✓

¹⁸⁴ [Northern Ireland Energy Strategy ‘Path to Net Zero Energy’ | Department for the Economy](#)

¹⁸⁵ [NI Peatland Strategy - Copy for EQIA Consultation. 8-8-2022. PDF_0.PDF](#)

Second Cyle Northern Ireland Flood Risk Management Plan 2021 - 2027¹⁸⁶	This Plan considers Cultural assets as part of its Strategic Environmental Assessment – it suggest working with HED and Archaeological Planning as well as adopting good standard working practices when considering works to manage flooding around heritage assets.	Risks to heritage assets due to maladaptation include flooding and drainage works which carry the risk of inadvertent harm to both designated and undesignated heritage assets, including those not yet identified. Heritage can also help us build resilience, understand how people and places have responded to climatic events through history and tell the story of climate change. HE Policy will highlight the need to manage adaptation of heritage assets and landscapes to flooding threats in a way which creates economic benefits whilst understanding and protecting assets and landscapes as a resource to learn about the past.		
--	--	--	---	---

¹⁸⁶ [Second Cycle Northern Ireland Flood Risk Management Plan 2021-2027 | Department for Infrastructure](#)

5.2 Part 2 – Climatic Factors - Environmental Characteristics

SEA topic	SEA Objective
Climatic Factors	• reduce greenhouse gas emissions • electricity and gas use • reduce vulnerability to the effects of electricity generated from renewable energy • climate change e.g. flooding, disruption to sources and Combined Heat and Power (CHP) located in the area travel by extreme weather, etc

5.2.1 Climatic Factors - Existing Baseline

- The Climate Change Act (Northern Ireland) 2022¹⁸⁷ (Act) sets a target of an at least 100% reduction in net zero greenhouse gas (GHG) emissions by 2050 (set against the 1990 baseline) . Currently, evidence is available to demonstrate that re-use compares favourably in terms of whole life carbon to demolition and re-build. There is an opportunity to re-use heritage assets in order to mitigate against the impact of carbon expenditure in construction, alleviating Northern Ireland's contribution to climate change.
- The Independent Assessment used to help inform the third UK Climate Change Risk Assessment ¹⁸⁸(CCRA3) assesses 61 risks and opportunities from climate change to Northern Ireland, including to business, infrastructure, housing, the natural environment, our health and from the impacts of climate change internationally.
- HED and others partnered with the National Trust to pilot a Climate Change Hazard Mapping Tool, however no data has been collated yet. No NI specific figures are yet available to understand overall risk to heritage assets from climate change impacts.
- The Department for Communities, Historic Environment Division recently confirmed support for the joint UK and Ireland Research Agenda for Climate Change and Heritage led by Historic England. We will continue to work with our sister organisations and wider partners to ensure that the value of our heritage can be realised, that the effects of climate change can be fully understood and that our heritage is protected for future generations to enjoy

¹⁸⁷ [Climate Change Act \(Northern Ireland\) 2022](#)

¹⁸⁸ [third UK Climate Change Risk Assessment](#)

- Work is underway through the HED digital transformation to access statistics on climate change impacts to historic monuments, and the potential to use monuments in agricultural landscapes as biodiversity areas by Historic Environment Division of Department for Communities.
- The Northern Ireland Climate Change Adaptation Plan (NICCAP3) - The Climate Change Act 2008 (the 2008 Act) places a statutory duty on Northern Ireland Executive Departments to lay programmes before the Northern Ireland Assembly, which set out their objectives, policies, proposals and timelines for introducing those policies and proposals in response to the most recent UK Climate Change Risk Assessment (CCRA). To fulfil this legal requirement the Department of Agriculture, Environment and Rural Affairs (DAERA) has led on the development of a series of single coordinated adaptation programmes, which are known as the Northern Ireland Climate Change Adaptation Programme (NICCAP), since the 2008 Act came into effect. A Key Area of NICCAP is that of 'People and the Environment':
 - *This key area combines 4 thematic areas due to the co-dependencies between them and links the themes of Towns & Cities, Buildings, Health, and Community Preparedness & Response ... This key area is concerned with the impacts of climate change on our lived experiences and so looks at how the built and urban environment we live in interacts with our health and how climate change poses risks to these. It also recognises the importance of a community's ability to prepare for and respond to emergency situations such as extreme weather events linked to climate change. The chapters each lay out the identified risks and opportunities for each theme and the actions relating to these risks ..'*
- The National Trust has partnered with sister organisations to create and evolve guidance¹⁸⁹ for adaptation of heritage assets to climate impacts.
- Climate NI published a Net Zero NI Mitigation Planning toolkit, which aims to outline a consistent and robust methodology for organisations to develop a Mitigation Plan, taking account of regional context for organisations in Northern Ireland. It also aims to align with internationally agreed best practice, which is continually evolving. ¹⁹⁰ Climate NI has developed this toolkit to support organisations - including heritage organisations - in Northern Ireland to take the first steps in developing their Mitigation Plans. The approach enables organisations to respond to requests for information under the Climate Change Act (NI) 2022, and other national or international frameworks, by enabling them to:
 - Gather consistent and comparable data for organisational greenhouse gas accounting,
 - Identify highest emitting service/business areas,
 - Explore actions and opportunities to put in place an organisational Mitigation Plan, and
 - Monitor and evaluate progress on implementing actions and reducing emissions.

¹⁸⁹ [Adapting for climate change | National Trust](#)

¹⁹⁰ [NI Toolkit | Develop Effective Climate Adaptation Plans | Climate NI](#)

The images below give an indication of the breadth and location of Climatic Factors in Northern Ireland.

Fig 30 - Coastal Erosion Study in NI (NIEA Marine Map Viewer – Copyright)

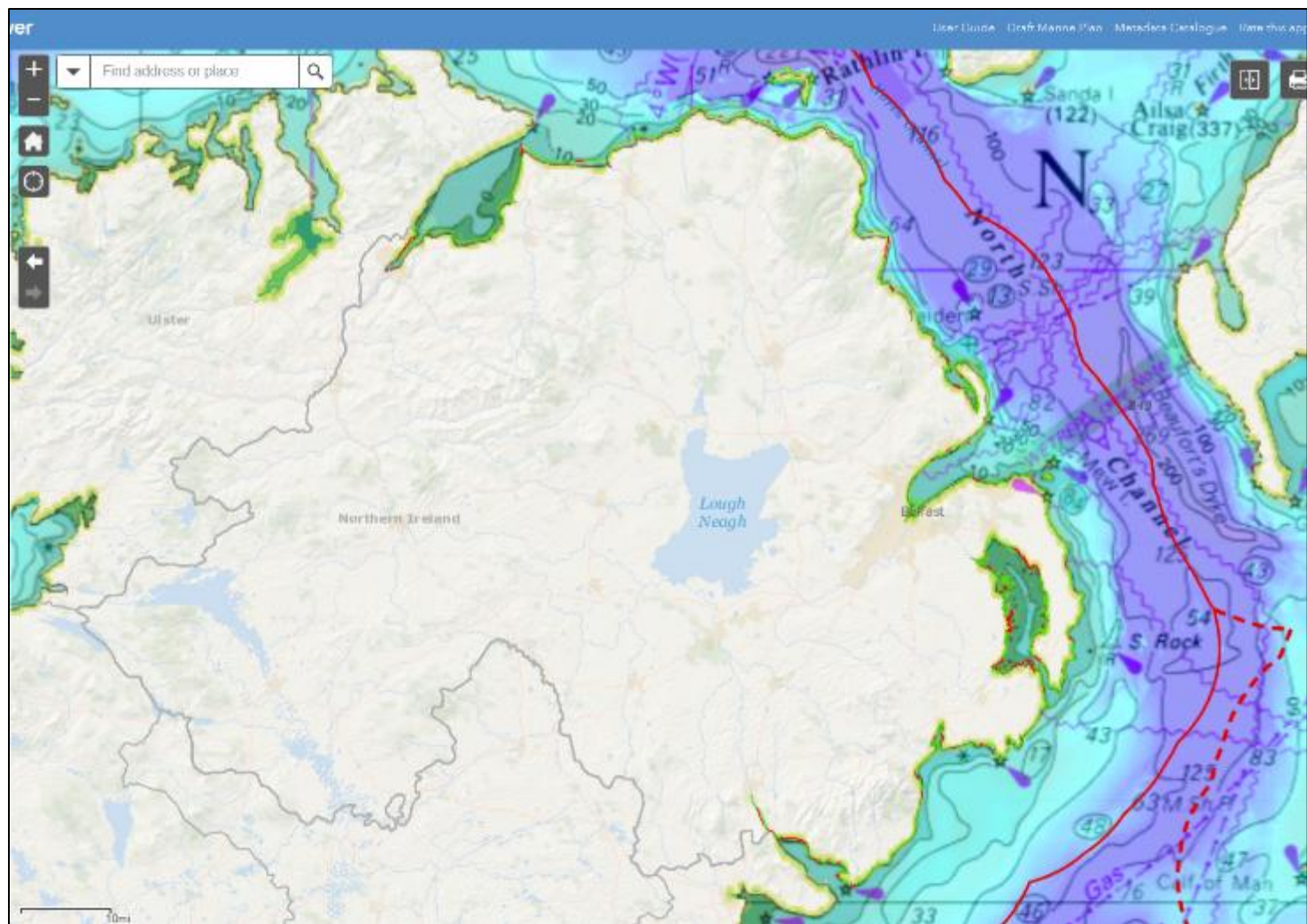


Fig 31 – National Trust Hazard Mapping tool showing NI

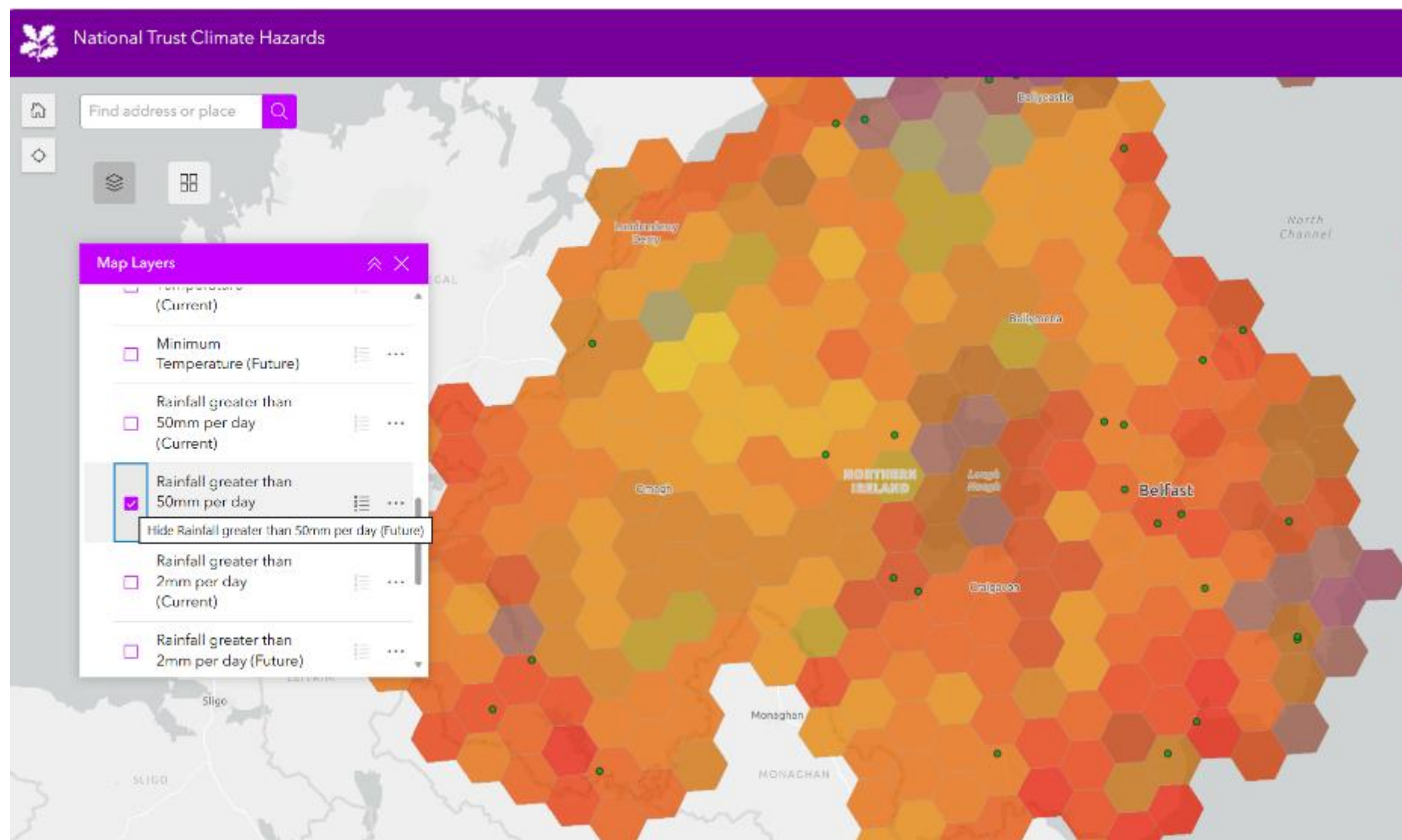
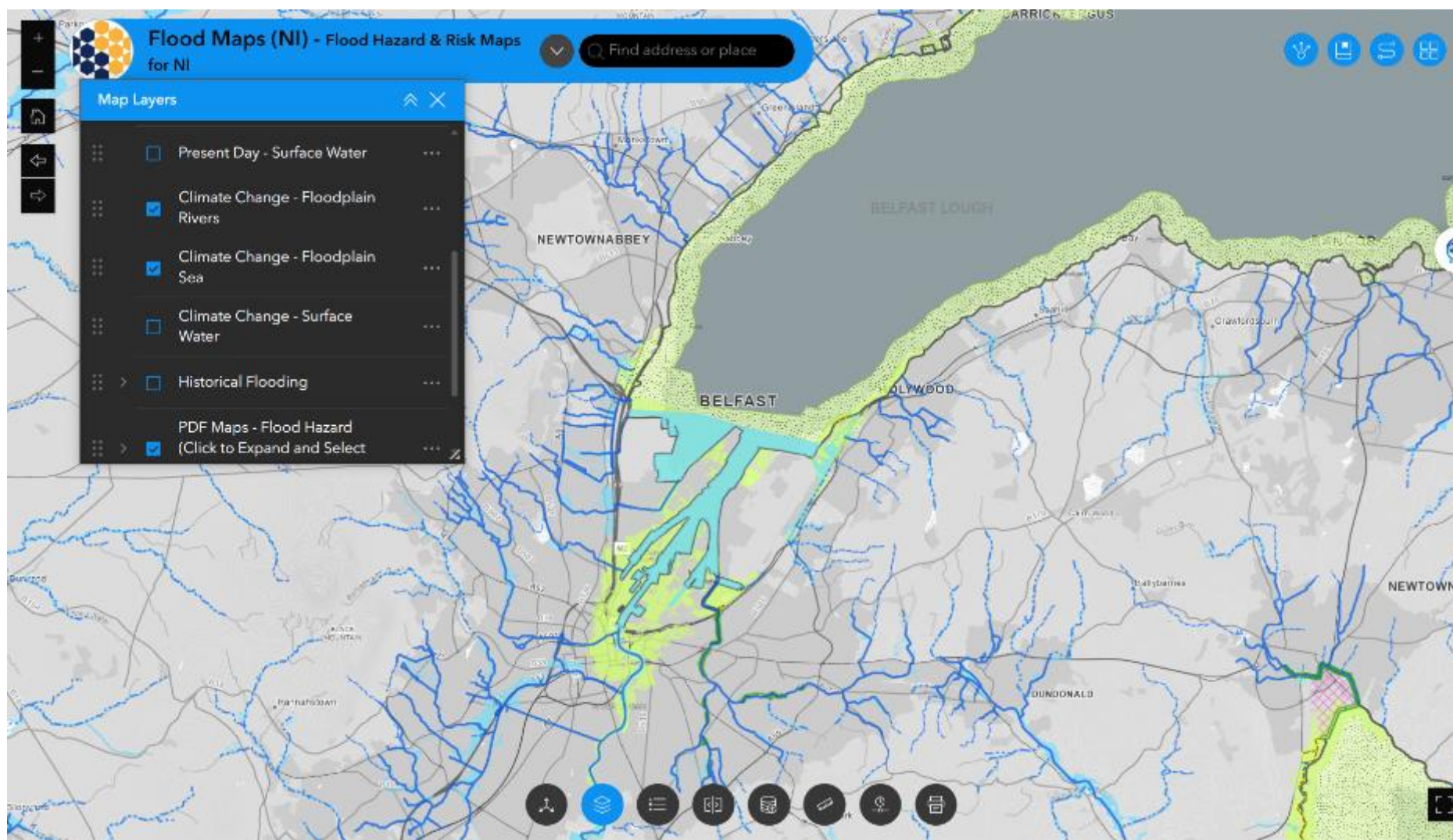


Fig 32 – Flood Risk maps – Flood Maps (NI) Department for Infrastructure



5.2.2 Climatic Factors - Environmental problems

- Scientific evidence from the Intergovernmental Panel on Climate Change (IPPC) has highlighted the dramatic changes to our climate and their causes. Northern Ireland faces changes to its climate over the next century. Projections suggest that we may face hotter, drier summers and warmer, wetter winters as a result of climate change.
- There is potential to use Climate vulnerability indices or spatial overlays that combine socio-economic vulnerability with environmental risk. These could help prioritize heritage assets most at risk, however this work has not yet been commissioned.
- Climate records suggest that the mean annual temperature has been steadily increasing since the end of the 19th century. The number of days per year where the temperature exceeded 20°C has also been increasing in the same timescale.
- In 2022, Northern Ireland's greenhouse gas emissions were estimated to be 21.3 MtCO₂e, a reduction of 26 per cent since 1990 baseline levels. The largest sectors in terms of emissions in 2022 were agriculture (29 per cent), domestic transport (18 per cent) and buildings and product uses (15 per cent).
- Heritage assets are at risk of economic exposure (e.g. insurance costs, repair liabilities) due to climate impacts on heritage assets.

5.3 Part 3 – Planet – HE Policy Impact

SEA topic	SEA Objective
Climatic Factors	• reduce greenhouse gas emissions • electricity and gas use • reduce vulnerability to the effects of electricity generated from renewable energy • climate change e.g. flooding, disruption to sources and Combined Heat and Power (CHP) located in the area travel by extreme weather, etc

5.3.1 Potential impact of HE Policy on the Planet

- Implementation of HE Policy is unlikely to have significant negative effects on Northern Ireland’s climatic factors.
- Northern Ireland is at Risk from climate change impacts. There are challenges to the historic environment now and in the future from climate impacts – in Northern Ireland this will mean more frequent storms leading to more frequent flooding¹⁹¹, soil erosion and storm damage. Heritage assets may be at risk from coastal, fluvial and pluvial flooding, erosion and wild fires related to a changing climate, changing land use and agricultural practices.
- The Predicted climate change effects may impact the historic environment at a strategic level particularly increased incidence of extreme weather, affecting the condition in particular of heritage assets already at risk through neglect or vacancy. The full picture is not yet visible or understood in NI. **HE Policy can support monitoring of condition as well as strategic aims to adapt heritage assets to climate change, such as flood resilience, coastal erosion monitoring, or heat stress on materials.**
- Maintain Our Heritage (2004) reports that gentle ‘mitigation’¹⁹² like regular inspections and systematic preventive maintenance are cost effective methods of preserving heritage buildings, avoiding disruption and minimising risk¹⁹³ and uncertainty – including the uncertain impacts of climate change. **HE policy can support climate vulnerability assessment of heritage assets.**

¹⁹¹ [Historic Environment Toolkit | Department for Communities](#)

¹⁹² miti-ga-tion: the action of reducing the severity, seriousness, or painfulness of something

¹⁹³ [Climate Change Risk Assessment \(CCRA3\) Evidence for Northern Ireland | Climate NI](#)

- HE Policy can have a role in mitigation against climate change by **promoting and contributing to effective re-use, retrofit and adaptation of traditional buildings**; The Draft Circular Economy Strategy says that ‘*More re-using of building materials and components, a greater focus on renovation and retrofitting rather than new-build can produce a 7.7% decrease in material footprint..*’¹⁹⁴; data on this opportunity en masse is not available specific to NI, however data does exist (Historic England¹⁹⁵, Historic Scotland the Sustainable Traditional Buildings Alliance and IHBC.)¹⁹⁶. HE Policy can support training and capacity-building in conservation trades to support climate adaptation and energy efficiency in heritage.
- Ulster Architectural Heritage (2021) report that maintenance helps in coping with climate change. HE Policy can support advice on making heritage assets energy efficient – including maintaining them at small scale (roofs and gutters) to keep walls dry.
- For the 12 month period January 2024 to December 2024, 44 per cent of total metered electricity consumption in Northern Ireland was generated from metered renewable sources located in Northern Ireland. HE Policy can provide guidance on selecting renewable energy sources for heritage assets or their settings; HE Policy can assist owners in adopting low-carbon lifestyles – including accurate EPC ratings.
- **Heritage can also help us build resilience, understand how people and places have responded to climatic events through history and tell the story of climate change, for example through study of peatlands** ; of for example the mean annual temperature for Northern Ireland has been calculated from the Armagh Observatory temperature records - AOP is a heritage asset and holds one of the longest records of weather data in the world¹⁹⁷.
- In the Listed Building Condition Survey¹⁹⁸, condition was cross-referenced with areas of high climate change risk (flooding etc). No correlation was noted, however this may be a long-term trend, and therefore this outcome remains inconclusive – research and monitoring supported by HE Policy can monitor climate impacts.
- HE Policy which **supports innovation can encourage remote sensing, GIS, or AI-based monitoring tools that could support climate resilience planning for heritage.**
- HE Policy could empower communities, support climate justice, or promote wellbeing through **stewardship of heritage places.**
- HE Policy which emphasises **sustainable development** aligns the principles of material reuse, salvage, and heritage-led regeneration with circular principles. The Draft Circular Economy Strategy says that ‘*More re-using of building materials and components, a greater focus on renovation and retrofitting rather than new-build can produce a 7.7% decrease in material footprint..*’¹⁹⁹

¹⁹⁴ [Circular Economy Strategy for Northern Ireland | Department for the Economy](#)

¹⁹⁵ [Monitoring and Measuring the Built Historic Environment’s Pathway to Net Zero | Heritage Counts | Historic England](#)

¹⁹⁶ [When Retrofit Goes Wrong | Heritage Counts | Historic England](#)

¹⁹⁷ [Weather Observations | Armagh Observatory & Planetarium | County Armagh](#)

¹⁹⁸ [Listed Buildings Survey](#)

¹⁹⁹ [Circular Economy Strategy for Northern Ireland | Department for the Economy](#)

- HE Policy could explore research to develop metrics/statistics on **re-use, EPCs, and carbon savings which are measurable and accountable.**

5.3.2 Potential Negative Impacts and Mitigation

- **Potential effect:** potential risks to heritage assets are due to maladaptation (for example due to incorrect specification for retrofit causing material harm).
- **Mitigation:** HE Policy which supports best practice and leadership, guidance and research, and partnerships with other parts of the UK and Ireland such as the North-South Memorandum of Understanding on Climate Action and Cultural Heritage to understand and adapt to climate change impacts and low carbon living will mitigate against this risk.
- **Potential effect:** Risks to heritage assets due to maladaptation also include Peatland restoration works which carry the risk of inadvertent harm to both designated and undesignated heritage assets, including those not yet identified. Evidence from individual case studies highlights failure to consider heritage assets in peatland restoration can result in damage to archaeological remains. This risk has also been acknowledged through anecdotal reporting by agencies including Historic England, Historic Scotland, and Bord na Móna.
- **Mitigation:** HE Policy, advice and outreach can highlight the need to manage peatlands in a way which creates economic benefits whilst understanding and protecting them as a resource to learn about the past, and the benefits of working with others which has been highlighted in the Northern Ireland Peatlands Strategy.

5.3.3 Likely Impact without HE Policy:

- Without HE Policy, opportunities to use the historic environment as a resource may be lost. The opportunity to promote and calculate re-use in particular of buildings as a contributor to saving carbon may be lost – important as buildings and the construction industry are one of the top ‘spenders’ of carbon in Northern Ireland
- With the drive towards energy efficiency, heritage buildings are considered inefficient. With that perception comes a preference for new-build, leaving historic buildings at the risk of vacancy – without HE Policy to promote the adaptability and support energy efficiency measure in historic buildings, there may be an increased risk of vacancy.
- As people adapt to climate change risks, the drive towards energy efficiency may mean that without leadership, resources and advice, buildings and monuments or archaeology are at heightened risk of maladaptation

- HE Policy can support the mapping of and recommend preventative steps against climate change impacts on heritage assets. Without HE Policy to direct these actions, opportunities may be lost and assets put at a higher risk, for example from flooding, coastal erosion or storm surges.
- Without HE Policy, opportunity for funding mechanisms, incentives, or green finance to support adaptation and retrofit at scale may be lost.

5.4 Part 4 - Suggested HE Policy Aims – Planet

5.4.1 Policy Aim 6: Maintaining and managing the historic environment in the face of environmental problems

Alternatives:	Do-nothing/Business as Usual – currently, climate change mitigation strategies are focused on in-use carbon. HE Policy creates an opportunity to lead on and advocate across government and elsewhere for the re-use of existing historic buildings and structures, consider reinvigorating and making best use of existing spaces or assets as an investment - ahead of creating new things at the expense of the environment. A ‘re-use first’ policy could be enacted, but the opportunity for central, high level strategic direction which is a material consideration in development control might be lost without HE Policy.
Selection:	Maintaining and managing the historic environment in the face of environmental problems • HE Policy will be a material consideration in future Planning decisions, having a positive effect for the historic environment and therefore potentially having a wide-reaching effect across NI on mitigating against and addressing climate change impacts through building re-use. • <i>‘The problem might be not that these assets are old, just that they are old-fashioned.’</i>²⁰⁰ Studies²⁰¹ show that retrofit and re-use of historic buildings pays off in terms of carbon counting in the long term²⁰² versus demolition and re-build. Re-use is a ‘win-win’ for places, people and planet²⁰³. HE Policy can guide others on how to curate energy efficient, climate resilient heritage assets which meet the need for a low-carbon future right across NI. • In the future, furthering understanding of NI specific climate hazards²⁰⁴ will help NI to understand and plan for these risks. But our actions to counter risks don’t need to be costly or threatening. HE Policy can support people to look after heritage assets, protecting them from harm, and saving them money in the long term²⁰⁵. • HE Policy can support people to ensure that historic places including land and seascapes²⁰⁶ are protected against extreme weathering and are adapted to withstand environmental threats. • Within that is the challenge of ensuring that the significance of heritage assets is sustained in the race to net-zero.

²⁰⁰ DfC Placemaking Group as part of HCC Programme engagement

²⁰¹ [UNDERSTANDING CARBON IN THE HISTORIC ENVIRONMENT](#)

²⁰² [Whole Life Carbon Guidance | Department for Communities](#)

²⁰³ Elefante *‘The Greenest Building is the one that already exists’*

²⁰⁴ [National Trust Climate Hazards](#)

²⁰⁵ Similarly, SIB (2020) highlights that regular preventive maintenance can prevent costly renovations in the future and increase the lifespan of historic materials.

²⁰⁶ [Y Môr a Ni: Ocean Literacy for Wales | North Wales Wildlife Trust](#)

	- Recognizing NI's landscapes as an important repository of biodiversity and of carbon capture on peatland, whilst also containing buried archaeology through HE Policy could collaboratively work towards protecting and sustaining them as a resource. - Owners and managers of heritage assets may avail of advice and support under HE Policy to enact best practice – considering carbon expenditure in the management of buildings and sites, including energy, access and supply of goods and services - HE Policy could aim to embed climate literacy in heritage interpretation, education, and outreach—using heritage to tell the story of climate change and resilience.		
Potential for Monitoring: HEADLINE METRICS	CLEANER ENVIRONMENT – - New Stat - Reporting to NICCAP – Measuring Re-use of historic buildings' contribution to carbon mitigation - New Stat - Data capture to monitor levels of re-use/adaptation of historic buildings - data may include reporting on numbers of buildings removed from the Heritage at Risk NI database, CAT heritage transfers, reflecting Carbon mitigation detailed for Gov't buildings - New Stat - PfCGE – Gov't contribution to mitigation/carbon offset through continued use, repair and CAT - New Stat - % of assets assessed for climate vulnerability		
Potential for Monitoring: SUPPORTING METRICS	- Consideration of the links between climate change indicators and listed building condition as recorded every 10 years in the listed building condition survey for reporting to NICCAP - Condition of Monuments (including Scheduled Monuments and Monuments in State Care) – as a figure and trend and relating to climate change indicators - New Stat – Numbers of Planning applications for change of use of Listed Buildings (Dfl) = re-use - New Stat - data on condition of other parts of the historic environment. This is harder to access, but we aim to develop more robust data for monuments in coming years - New Stat - level of funding for energy efficiency in HBs - New Stat - % or Number of Listed Buildings with EPC over C rating		
Effects on SEA Objectives:	Material Assets	++	HE Policy can have a highly positive effect on material assets through the reduction of waste and promotion of uptake of sustainable, traditional materials, the role the historic environment plays in providing existing infrastructure, built environments and landscapes and actions to address threats to the quality of heritage places through neglect of material assets. Material assets like buildings or historic infrastructure may be re-used to combat climate change – again leading to conservation.
	Landscape	++	HE Policy supports the protection of landscape character, local distinctiveness and scenic value.
	Population / Health	++	HE Policy supports improved access, understanding and community involvement in heritage care

	Climatic Factors	++	HE Policy supports activity which mitigates emissions through re-use and supports climate adaptation. to the effects of climate change.
	Biodiversity, Flora, Fauna	+	HE Policy can protect settings with mutual benefit for habitats and species
	Air, Soil and Water	+	HE Policy supports reduced construction emissions and better energy guidance support environmental quality.
	Cultural Heritage	++	HE Policy strongly safeguards designated, undesignated and intangible heritage, including assets at risk, and supports climate-resilience.

6 People

6.1 Population and Human Health

6.2 Part 1- Population and Human Health – Relationship with other plans, programmes and strategies

SEA Topic - Population and Human Health				
Protection				
Cultural Heritage in Northern Ireland is treated as a human rights issue, ensuring that communities' identities, traditions and expressions are respected and safeguarded. These rights are protected through: • European Convention on Human Rights (ECHR Article 10)²⁰⁷ • The Good Friday (Belfast) Agreement²⁰⁸				
International Convention, declaration or charter	Legislative basis, environmental objectives or requirements of the plan or programme	How objectives and requirements of other plans or programmes might be taken on board in Historic Environment Policy (HE Policy) or how HE Policy might impact other plans, policies or programmes	Impacts on HE Policy	HE Policy may impact outcomes
The Paris Convention (1954)	This convention recommends best practice and doctrine. Also known as the Paris Convention of 1954, its main relevant obligations are: • Development of the national contribution to the common cultural heritage of Europe (article 1)	Historic Environment Policy will support and enhance the objectives of this Charter in Northern Ireland, with aims to safeguard heritage, and promote equal and common access to heritage, for people's benefit.	✓	

²⁰⁷ [European Convention on Human Rights](#)

²⁰⁸ [The Belfast Agreement - GOV.UK](#)

	- Safeguarding objects of European cultural value placed under government control (article 5) - Ensuring reasonable access to such objects (article 5) The UK has been a signatory of the Paris Convention since 1954.			
2003 UNESCO Convention on the Safeguarding of Intangible Cultural Heritage (2003)	This Convention, ratified by the UK in 2024 recognizes traditional craftsmanship, oral traditions and expressions, performing arts, social practices, rituals and festive events, knowledge and practices related to nature and the universe.	HE Policy will support this convention, including a commitment to an increased inventory of Northern Ireland's traditions, including practices inspired by diaspora communities, and to better safeguarding of the most at-risk traditions and crafts. The link between tangible and intangible heritage is self-evident; supporting activity which uses, celebrates and understands historic assets and places will support and enhance the objectives of this Convention to protect intangible cultural heritage, but also for people to interpret, enjoy and understand tangible heritage.	✓	
Other plan/programme or strategy	Legislative basis, environmental objectives or requirements of the plan or programme	How objectives and requirements of other plans or programmes might be taken on board in Historic Environment Policy (HE Policy) or how HE Policy might impact other plans, policies or programmes	Impacts on HE Policy	HE Policy may impact outcomes
Programme for Government (PfG) 2024-2027²⁰⁹ Wellbeing Framework	PfG includes a Wellbeing Framework, whose key indicators are a combination of social, environmental, economic, and democratic factors which are essential for society to flourish.	Historic Environment Policy has the potential to shape environmental actions which will positively impact the NI Wellbeing Framework; supporting research and evidence which demonstrates that improved quality of life can be achieved through the care of and enhancement of the historic environment.	✓	✓

²⁰⁹ [Programme for Government 2024-2027 'Our Plan: Doing What Matters Most' | The Northern Ireland Executive](#)

		HE Policy should enhance and expand the environmental protection objectives within future PfG(s) which will be formed in the lifetime of this policy – for example ‘ <i>..that everyone feels the benefit of a growing economy, improved environment and a safer and fairer society</i> ’.		
Building Inclusive Communities 2020 – 2025 – Department for Communities	DfC’s Building Inclusive Communities Strategy sets out how DfC will work across government, its Arm’s Length Bodies and with communities in delivering their common purpose of Supporting People, Building Communities, Shaping Places.	Historic Environment Policy supports actions which will positively impact the environment – helping to shape places, build communities and support people. HE Policy will provide high level advice on Government’s attitude to the historic environment which will influence Department for Communities Strategy and future strategies, demonstrating how it can meet its objectives through caring for and making full use of the potential of the historic environment.	✓	✓
Children and Young People’s (CYP) Strategy 2020-2030 – NI Executive²¹⁰	Among the outcomes that the CYP Strategy aspires to are that: <i>‘Children and young people are physically and mentally healthy.. Children and young people enjoy play and leisure.. Children and young people learn and achieve.. Children and young people experience economic and environmental well-being.. Children and young people make a positive contribution to society..</i>	During the consultation for the CYP strategy, stakeholders stressed that poor quality environments can have a negative impact on health and well-being. Children and young people living in more socio-economically deprived circumstances often live in lower quality environments and can be exposed to a greater range and intensity of environmental risks. HE Policy which monitors young peoples’ participation levels (including education, access, volunteering and employment) in heritage can begin to form a picture of how heritage can enable children to have a good start in life. If historic environments are well cared for, this overall contribution to quality environments can again have a positive impact on young people, aligning with the CYP Strategy.	✓	✓

²¹⁰ [final-executive-children-and-young-people's-strategy-2020-2030](#)

	<i>Children and young people live in a society which respects their rights..'</i>			
NI Anti-Poverty Strategy²¹¹ (Currently out to Public Consultation)	The Anti-Poverty strategy aspires to eliminate disadvantage, making all parts of NI equal.	HE Policy recognises that we ALL should have access to the historic environment and use it equally. Our shared heritage, found all over Northern Ireland, has the power to enrich all of our lives. A reversal of dilapidation/regeneration using vacant heritage buildings in areas of deprivation will be a key aim of HE Policy and so could align with the strategies to 'level up' communities throughout NI.	✓	✓
Volunteering Strategy and Action plan – Department for Communities²¹²	<i>The volunteering strategy aims to align activities across government, the voluntary and community sector and other stakeholders to re-energise and increase levels of volunteering. The strategy, which is accompanied by an action plan, aims to create the conditions under which volunteering activity within Northern Ireland can develop and flourish.</i>	HE Policy will acknowledge and encourage the key role of volunteers in the care of heritage assets and places – often at the heart of communities for example graveyards, historic parks and gardens, and the grounds of historic buildings. The side benefits of volunteering – bringing people together and community cohesion – could work in tandem with the care of places, including the opportunity for communities to 'Adopt' monuments or spaces.	✓	✓
Independent Review of Education And TransformED NI: Transforming	The Independent Review of Education panel published its final report on 13 December 2023. This final report, which is the culmination of two years work, outlines key recommendations from the Independent Review of Education.	HE Policy could support recommendations from the Independent Review which highlighted the potential of heritage to help maintain interest in education among teens: <i>“For instance museums and local heritage assets can be used to build upon and enrich the existing curriculum, but they could do more to educate local learners about cultural heritage; this would help to build community, a sense of</i>	✓	✓

²¹¹ [Consultation on NI Executive Anti-Poverty Strategy | Department for Communities](#)

²¹² [Volunteering strategy and action plan | Department for Communities](#)

teaching and learning: a strategy for Educational Excellence in Northern Ireland²¹³	Key recommendations include the need to prioritise investment in education, promote learner’s learning together, expand early years education, reconfigure the network of schools, simplify the management of education, reform the curriculum and increase the age of educational participation to 18. The report says: <i>‘There are some children who find school difficult from the outset, but more begin to experience problems in late primary/early post-primary years...In early adolescence brain changes of a different type from those of the early years are occurring...For the most part education systems ignore these developments...access to a wide range of extra-curricular programmes will allow learners to pursue their own interests and talents in a more informal setting and will help improve learners sense of self-worth, help them develop wider skills and build their confidence, ensuring they feel fully engaged and committed to their education.</i> TransformED NI outlines a comprehensive strategy for the transformation of teaching and learning in Northern Ireland. In April 2024, the Department published the TransformED Delivery Plan which translates the strategy’s vision for educational excellence into actionable steps.	<i>identity and social cohesion. Local heritage should be formally integrated throughout the curriculum (a new policy is required). This may engage more learners including disadvantaged learners and allow them to connect with their local community”.</i> HE Policy could further support the TransformED strategy – for example <i>‘raising the age of education participation so all learners should, by law, remain in education, apprenticeship or training until age 18’</i> could be met using more heritage apprenticeship opportunities. When considering the reform of the curriculum, heritage assets which are local to schools are a free, existing resource for learning about history, and also potentially other topics like climate change. HE Policy can promote using heritage assets both for formal education and for informal learning. Pride in place can start at an early age, through learning about ‘my place’.		
Tackling Rural Poverty & Social Isolation – A New Framework 	<i>The Tackling Rural Poverty and Social Isolation (TRPSI) Framework is a rural initiative led by the Department of Agriculture and Rural Development (DAERA) which aims to tackle poverty and social isolation in rural areas</i>	80% of historic monuments are found on farmland. Many historic settlements, landscapes and small villages are centred on historic layouts, infrastructure like bridges and canals and heritage buildings like churches and features like	✓	✓

²¹³ [TransformED NI: Transforming teaching and learning: a strategy for Educational Excellence in Northern Ireland | Department of Education](#)

Department of Agriculture, Environment and Rural Affairs²¹⁴	<i>through organisations working in partnership to design and implement measures which target the needs of vulnerable people. TRPSI is one of a number of complementary initiatives led by DAERA which are aimed at helping to ensure that the needs of rural communities are addressed.</i>	market squares. Key to HE Policy will be acknowledging, documenting/recording and making people aware of the valuable resources on their doorsteps by giving them access to information and supporting them to look after their assets.		
International Relations Strategy – The Executive Office	The key objectives of the Strategy include bringing investment, exporting opportunities, jobs, tourists, new skills and best practice into Northern Ireland. This will be achieved by ‘..promoting NI’s capabilities internationally and developing mutually beneficial relationships with targeted countries, regions and international organisations.’	HE Policy can support and continue to support the International Relations Strategic Aims/Objectives, using the historic environment. This includes long term aspirations to: • Strengthen international economic position and support investment, trade, tourism, agriculture, community and conflict resolution work, science and research; • Develop and maintain effective relationships with targeted countries and regions to help contribute to Programme for Government priorities; • Proactively seek opportunities for sharing information and best practice and build on international reputation and experience for facilitating peace building and post conflict reconstruction; • Work with the British and Irish Governments; the US Administration and the European Union to help promote international objectives and identify opportunities; • Build on international connections and reputation in the areas of culture, art, sport and ente <i>For example, Historic Environment Scotland’s ‘Heritage Places, Breathing Spaces’ campaign</i>		

²¹⁴ [Tackling Rural Poverty & Social Isolation – A New Framework | Department of Agriculture, Environment and Rural Affairs](#)

About Together: Building a United Community (T:BUC)²¹⁵	<i>'The 'Together: Building a United Community' (T:BUC) Strategy, published on 23 May 2013, reflects the Executive's commitment to improving community relations and continuing the journey towards a more united and shared society.'</i>	<i>has launches to boost wellbeing through connection to heritage</i> rtainment; • Contribute to international development using local expertise and build partnerships with key organisations and countries. The T:BUC Strategy outlines how government, community and individuals are working to build a united community and achieve change against the following key priorities: • our children and young people • our shared community • our safe community • our cultural expression Each of the four key priorities also has a set of tangible and practical commitments. The Strategy is delivered through T:BUC funded programmes, which HE Policy will support – for example the 'Urban Villages Programme', the 'Peace Plus Programme' and good relations programmes. In particular, the strategy supports actions in contested spaces, and options to develop shared space in a rural context. Historic buildings and spaces can provide neutral venues and spaces with a shared sense of history and common ground which stretches beyond modern memory.		
--	--	---	---	---

²¹⁵ [About Together: Building a United Community \(T:BUC\) | The Executive Office](#)

Heritage, Culture and Creativity Programme²¹⁶	The HCC Programme provides a focal point for the Minister's responsibilities across culture and the historic environment. It is the platform to connect with, and influence, relevant policies, strategies and actions across the Executive departments, in local government and more widely	As part of the HCC Programme, We will compliment other 'Impact' areas like the Arts, Libraries and Museums whose value is not always expressed in economic terms. HE Policy will combine with others to develop of a strong framework that will support the growth of the contribution of our culture and historic environment; the appreciation of this contribution and the role of the Department as a focal point for this, helping it to significantly influence relevant strategies across central and local government.		
---	---	---	---	---

²¹⁶ [The Heritage, Culture and Creativity Programme Purpose and Framework](#)

6.3 Part 2 – Population and Human Health - Environmental Characteristics

6.3.1 Population and Human Health - Existing Baseline

The Environment (general)

Public Attitudes²¹⁷ : - NI Environmental Statistics report 2025 reported that:

- The level of public concern about environmental issues was high in 2024/25 - 73 per cent* were very or fairly concerned about the environment.
- Pollution of air, water and soil and illegal dumping of waste and litter were the greatest environmental concerns for households at 28 and 27 per cent respectively.
- When asked what they considered important in helping to tackle climate change in Northern Ireland, most people said ‘protecting the environment’. Most answer categories were popular with over two thirds selecting protecting the environment (69 per cent), followed by reducing emissions (63 per cent), grow the economy in an environmentally sustainable way (61 per cent) and ensure society can adapt to changes brought about by climate change (57 per cent), reusing, recycling and disposing of waste products appropriately 91 per cent, reducing food waste 70 per cent, reducing consumption of household utilities 59 per cent
- The most common actions taken by households for environmental reasons in 2024/25 were reusing, recycling and disposing of waste products appropriately, reducing food waste and reducing consumption of household utilities.
- Connecting people with nature is key to a thriving environment. The People in the Outdoors Monitor for Northern Ireland (POMNI) shows that regular outdoor participation is linked to stronger environmental concern and behaviour. However, access to, and participation in outdoor recreation is not equal across society. POMNI data shows a correlation between limited access to natural spaces and lower participation levels, with older age groups, those living in rural areas and deprived areas reporting less access to greenspace and trails. In April 2025 47.8 per cent of households are within 400m of greenspace >2ha or off-road trails. This is a decrease of 0.1 per cent from 2024 (47.9 per cent). The 2023 baseline was also 47.9 per cent.
- 74.7 per cent of households are within 1km of greenspace >2ha or off-road trails. This is a decrease of 0.1 per cent from 2024 (74.8 per cent). This was unchanged from the 2023 baseline of 74.8 per cent.
- 84.3 per cent of households are within 2km of greenspace >20ha or off-road trails. This is similar to 2024 and the 2023 baseline This indicator is also used as a wellbeing framework indicator in the latest Programme for Government (PfG) 2024-2027.

²¹⁷ NISRA’s Continuous Household Survey (CHS) - [CHS survey documents](#) | Northern Ireland Statistics and Research Agency

- Car travel continues to dominate the way people in NI do most of their day-to-day travelling.²¹⁸ Information on how and why people travel in Northern Ireland including the number of journeys per person, average distance travelled can be sourced from the Department of Infrastructure's Northern Ireland Travel Survey section.
- The Independent Assessment used to help inform the third UK Climate Change Risk Assessment²¹⁹ (CCRA3) assesses 61 risks and opportunities from climate change to Northern Ireland, including to business, infrastructure, housing, the natural environment, our health and from the impacts of climate change internationally. Risks requiring action include:
 - Risks to people, communities and buildings from flooding.
 - Risks to cultural heritage.
 - Risks to business sites from flooding.

Historic Environment

- NISRA's Continuous Household survey reported in 23/24 that people visiting a heritage site had statistically greater life satisfaction than those who did not (scoring 7.9 versus 7.6 respectively)
- In the Listed Building Owners' Survey²²⁰ The fourth most cited advantage of owning a listed building was that it benefits mental health and wellbeing (21% of respondents).
- In the Monument Owners' Survey²²¹ almost a third of monument owners said that an advantage to owning a monument was the 'feel good factor'.²²²
- Data on how the historic environment contributes to health and well-being has been recorded in other jurisdictions in the UK and in ROI, but though case studies exist, a comparable calculation of the benefits of the historic environment in real terms to NI's health, wellbeing and quality of life does not yet exist, though there have been a number of small scale projects which point to the potential of heritage as 'preventative medicine – for example 'Heritage4Health'²²³ demonstrates that heritage participation fosters both hedonic (happiness-based) and eudaimonic (meaning-based) wellbeing, contributing to:

²¹⁸ [Travel Survey \(TSNI\) | Department for Infrastructure](#)

²¹⁹ [third UK Climate Change Risk Assessment](#)

²²⁰ [Listed Buildings Survey](#)

²²¹ [Scheduled Historic Monuments Survey](#)

²²² [Listed Buildings Survey](#); [Scheduled Historic Monuments Survey](#)

²²³ [Heritage 4 Health - NI Environment Link](#)

- Psychological and Mental Health Benefits – Reduced stress, anxiety, and depression through immersive engagement with heritage sites, cultural landscapes, and community history.
- Social Wellbeing and Community Cohesion – Strengthened social bonds, intergenerational exchange, and increased civic participation, particularly among marginalized and vulnerable groups.
- Cultural Identity and Ontological Security – A sense of continuity and stability in a rapidly changing world, particularly in areas with contested histories or shifting demographics.
- Physical Wellbeing – Increased outdoor activity, mobility, and physical engagement through interaction with heritage-rich landscapes and green spaces.
- Economic and Regenerative Benefits – Heritage-led regeneration projects contribute to place-making and sustainable tourism, fostering economic prosperity alongside social wellbeing.

However, despite this growing evidence base, consideration of the role played by heritage is often excluded from formal public health and social wellbeing policies, leaving its potential impact underutilised and undervalued.

- Historic England report ‘Evidence Enquiry for Wellbeing and Heritage’²²⁴
- For example, Historic Environment Scotland’s ‘Heritage Places, Breathing Spaces’ campaign has been launched to boost wellbeing through connection to heritage. Laura Macdonald, a public health researcher specialising in place-based health inequalities at the University of Glasgow, worked with HES in 2023 to lead research revealing the important links between heritage and mental wellbeing. It comes after a recent HES survey* found 60% of people reported improved wellbeing because of visiting a HES site, and 74% of people felt a sense of connection to the sites after visiting.²²⁵²²⁶
- In (NISRA)’s annual Continuous Household Survey 2024-25²²⁷ in 2024/25, 64% of adults in Northern Ireland had visited a place of historic interest, an increase on the 2022/23 figure of 59% though the same as in 2023/24.

In the same year:

- There was no difference in the proportions of men and women who had visited a place of historic interest within the previous year (both 64%).

²²⁴ [Evidence Enquiry for Wellbeing and Heritage](#)

²²⁵ [New campaign seeks to boost wellbeing through connection to heritage](#)

²²⁶ [University of Glasgow - Schools - School of Health & Wellbeing - Research - MRC/CSO Social and Public Health Sciences Unit - Sharing our evidence - Improving Health Blog - Discovering heritage in your local neighbourhood](#)

²²⁷ [Experience of culture, arts and heritage by adults in Northern Ireland](#)

- Adults with a disability were found to be less likely to have visited a place of historic interest than those without a disability (56% and 67% respectively).
- Analysis by deprivation level showed that adults living in the least deprived area were more likely to have visited a place of historic interest than those living in the most deprived areas (77% and 51% respectively). In addition, those living in urban areas were more likely to have visited a place of historic interest than those living in a rural area (65% and 62% respectively).
- A higher proportion of adults from the Protestant community had visited a place of historic interest within the previous year (70%) than those from the Catholic community (57%).²²⁸
- Adults with dependants were more likely to have visited a place of historic interest (69%) compared to adults who do not have dependants (60%).
- While there was no difference in the proportions of males and females who had visited a place of historic interest within the previous year (64% and 65% respectively), there was a difference when analysed by age. The proportion of adults visiting a place of historic interest increased from those aged 16-24 to those aged 35-44 before dropping for adults aged 55 and over.
- There is currently a lack of social value/capital research directly relating to the historic environment and there are currently no directly measurable metrics to monitor change/ impact which are specific to NI's circumstances.
- There are no figures available on the number of heritage volunteers in Northern Ireland.
- Some figures are available to report on the number of 'openers' each year in the annual European Heritage Open Days events in NI, however overall NI figures are not collated currently, and don't reflect the large number of heritage activities and events which take place each year across a diverse range of organisations – both public and private.

²²⁸ *'using cultural assets to bring people together for therapeutic or social purpose'*

The 'Together: Building a United Community' (T:BUC) Strategy, reflects the NI Executive's commitment to improving community relations in Northern Ireland and continuing the journey towards a more united and shared society. The strategy outlines how government, community and individuals will work together to build a united community via a range of initiatives.

6.3.2 Population and Human Health - Environmental problems

- There is sufficient data to know that heritage assets have not been equally accessed by people across ability, religious and socio-economic profiles.
- There is insufficient statistical data to provide a complete overview of who does and does not have access to heritage (paid or free):
 - There is currently no statistical data available relating to racial group status and access or attitudes to the historic environment in NI.
 - There is currently no statistical data available relating to sexual orientation and access or attitudes to the historic environment in NI.
 - There is currently no statistical data available relating to political opinion and access or attitudes to the historic environment in NI.
 - European Heritage Open Days²²⁹ a free event which take place every September in Northern Ireland is the most widely celebrated cultural event shared by the people of Europe, offering free access to historic places over one weekend. There is no profiled data available for who attends this event, despite numbers being in the tens of thousands.
- NISRA data/evidence tells us that the historic environment is not visited/accessed equally across society. These figures represent access to heritage places – but there are no statistics which capture engagement with heritage activity in Northern Ireland – heritage related activity is therefore largely invisible to the sector and to other sectors like education and tourism.
- The non-monetary opportunities and benefits of owning, caring for, living amongst and using heritage assets are not fully understood in a Northern Ireland context i.e. its positive impacts on social value, quality of life, health, education, identity and pride in place.
- Funding for heritage assets has declined steeply in recent years²³⁰, leading to closures, for example in State Care sites. Of the 167 well known State Care buildings like Carrickfergus Castle and Dunluce Castle, nearly one fifth are in need of maintenance.
- Heritage projects are often perceived as ‘niche’ and a ‘nice to have’ – their potential is not recognised or fully understood in NI.
- This is exacerbated by the view that heritage is ‘elitist’ and ‘difficult’.
- This issue is accelerating due to a further legacy of neglect / lack of maintenance undermining the value of heritage buildings among society.
- Dilapidation is not neutral, it can have a negative effect on people quality of life and life chances. Most HARNI as well as most HARNI saves are in areas of deprivation (UAH).

²²⁹ [European Heritage Open Days | Department for Communities](#)

²³⁰ [Investing In Creative Delivery](#)

6.4 Part 3 – Population and Human Health – HE Policy Impact

SEA topic	SEA Objective
Population and Human Health	• create conditions to improve health and reduce health inequalities • promote healthy living • protect and enhance human health • reduce and prevent crime, reduce fear of crime • decrease noise and vibration • increase opportunities for indoor recreation and exercise

6.4.1 Potential impact of HE Policy on People

- Implementation of HE Policy is unlikely to have significant negative effects on People in Northern Ireland.
- However, **visiting and engaging with the historic environment improves physical and mental wellbeing**, and can improve community cohesion – it has the potential to enrich people’s lives – and have a significant positive impact on people.
- HE Policy is very relevant to most people in NI (as shown above) and matters to improve the historic and wider environment are relevant to a wide part of the population – changes therefore can have a **significant positive impact on addressing people’s concerns**; the **historic environment is a successful and animated engagement tool between people and their living, working and leisure environments**
- **Heritage sites are a means of access to the countryside and coast**; they bring wider benefits such as **tourism and volunteering**; access to heritage is often the lens through which people experience **nature and heritage together**.
- Activities centred around the historic environment and heritage sites can contribute to tackling inequality and healing through heritage
- HE Policy is likely to have positive effects for population and human health through support for continued access to cultural sites including those State Care sites and structures in the care of the Department, within the NI Government Estate and activities relating to further interpretation, use, enjoyment and understanding.
- Understanding through learning, **enjoyment and celebration of heritage can lead to an improved sense of value**, in return creating **increased desire for protection**.

- **Community involvement in decisions affecting their places and spaces can lead to better and longer term, sustainable uses for heritage assets, contributing to thriving communities.**
- A decline or improvement in condition of the historic environment can have an impact on people through a negative or positive impact on the **quality of their living or working environment**
- HE Policy to re-use buildings responds directly and visibly to people's **desire to reduce waste.**
- HE policy which responds to energy consumption by providing advice on maintaining and correctly adapting heritage assets to consume less energy directly responds to this desire and need to **reduce energy consumption fairly** for owners of heritage assets.
- Recommending best practice in managing heritage assets can open them up for **access to a wider population**, with potentially few physical changes needed. HE Policy will support welcoming places for a much broader range of people – across all backgrounds, age groups and abilities.
- HE policy can support **stronger links and more equal access across rural and urban areas to heritage assets.**
- Open space strategies and outdoor recreation plans have been drawn up for a number of regional areas including local authorities and Areas of Outstanding Natural Beauty (AONB). **Strong partnerships** already exist could be built upon **which marry intangible and tangible heritage** through projects by for example the Rural Community Network or Local Landscape Partnerships.
- HE Policy can help to **collate evidence** of the relationship between heritage assets and their protected, often open, outdoor settings or access which often involves walking and being in the outdoors which **contributes to wellbeing.**
- HE Policy offers the potential to **work in partnership with other policies** – like the NI Architecture and Built Environment policy and the Environmental Improvement Plan as well as strategies within the Department of Health to emphasise the relationship between quality places and wellbeing.

6.4.2 Potential Negative Effects and Mitigation

- **Potential effect:** HE Policy will support adaptation for energy efficiency. This brings with it the risk of maladaptation (for example due to incorrect specification for retrofit causing material harm) which can have a detrimental effect on human health – such as poor ventilation causing black mould.
- **Mitigation:** HE Policy which supports best practice and leadership, guidance and research, and partnerships with other parts of the UK and Ireland to understand and adapt to climate change impacts and low carbon living with guidance and good practice flowing from HE Policy will mitigate against this risk.

6.4.3 Likely Impact without HE Policy:

- Without HE Policy, opportunities to use the historic environment as a resource for wellbeing, including for example ‘social prescribing’ may be lost.
- Without HE Policy, the opportunity to conserve, protect or enhance the historic environment to improve or celebrate identity for places or landscapes may be lost – at a cost to people
- Without investment in the historic environment, including State Care monuments, it will continue to decline; this negative effect on people’s living environments and communities can put increased strain on resources in other areas such as health, education and lack of employment – a potential resource is wasted
- Without HE Policy, the opportunity to build wealth in communities and accommodate shared, community spaces through for example the Community Asset Transfer process may be lost
- Without HE Policy, the risk of bad practice could have a detrimental effect on human health through poor understanding and unsuitable specification.

6.5 Part 4 - Suggested HE Policy Aims – People

6.5.1 Policy Aim 7: Exploring the potential for quality historic places to support wellbeing, and quality of life

Alternatives:	• Do-nothing/Business as Usual – there have been a number of small scale projects which point to the potential of heritage as ‘preventative medicine – for example ‘Heritage4Health’; a small number of internal studies have been carried out to gather qualitative data from visits to State Care monuments about the positive impacts on well-being and confidence for example, both for younger and older people. However, currently there are missing links between this information and health provision. To use research to scale this potential up and make connections to the Department of Health and throughout communities into community wellbeing has the potential for much greater benefits than to retain the status quo.
Selection:	Exploring the potential for quality historic places to support wellbeing, and quality of life • <i>‘There is now strong evidence that the environments in which people live, grow and work affect their mental health ...a good environment can bring positive benefits to mental health.’²³¹</i> • Living in, caring for and enjoying the historic environment is a key contributor to wellbeing²³², community and social cohesion, good relations, potential employment and better life chances. • Evidence²³³ elsewhere tells us what potential for wellbeing access to historic environments and heritage activity has for people in NI. An HE Policy aim which focuses on health would support work with both custodians and the health sector to understand how more could be done to realise this potential locally²³⁴; <i>Understanding the monetary value of the health and wellbeing impacts of culture and heritage enhances government’s ability to make informed decisions about resource allocation across all parts of the public realm.</i>²³⁵ • Evidence also points to our health being a product of people having pride of place and community cohesion in quality environments: urban, rural and natural. • HE Policy Aims to support peace and cohesion can also contribute to realising this aim to benefit people’s health.

²³¹ [Mental Health in Northern Ireland Fundamental Facts 2023 | Mental Health Champion Northern Ireland](#)

[Mental Health in MHF Northern Ireland Fundamental Facts 2023.pdf](#);

²³² British Medical Journal - [Is spatial exposure to heritage associated with visits to heritage and to mental health? A cross-sectional study using data from the UK Household Longitudinal Study \(UKHLS\) - PubMed](#)

²³³ [Wellbeing and Historic Environment: Why Bother? | Historic England](#)

²³⁴ [Social Prescribing Toolkit - NI Environment Link](#)

²³⁵ [CULTURE AND HERITAGE CAPITAL: MONETISING THE IMPACT OF CULTURE AND HERITAGE ON HEALTH AND WELLBEING](#)

Potential for Monitoring: HEADLINE METRICS	HEALTHIER LIVES % of adults and young people in Northern Ireland who have visited a place of historic interest (by age) (NISRA)		
Potential for Monitoring: SUPPORTING METRICS	• % of adults with a disability to have visited a place of historic interest within the previous year (NISRA) • % of men and women who had visited a place of historic interest within the previous year (NISRA) • % adults with dependants to have visited a place of historic interest (NISRA) • New Stat - There is currently no statistical data available relating to racial group status and the historic environment • New Stat - There is currently no statistical data available relating to sexual orientation and the historic environment • Number of visits by schools to State Care Monuments as an annual figure (Young people survey?) • Number of visitors total to State Care sites • Number of visits by Level 3 students (UU, QUB, FHE) to HERONI • Access to HERONI, NMNI, PRONI • New Stat - Stat % HERoNI records and artefacts accessible to public – physically, digitally • Number of contacts with HERoNI (queries/visits) and HED Queries		
Effects on SEA Objectives:	Material Assets	++	HE Policy enhances recognition and use of historic places, supporting high-quality, well-maintained assets and spaces.
	Landscape	++	HE Policy strengthens appreciation and protection of landscape character, distinctiveness and scenic value.
	Population / Health	++	HE Policy improves wellbeing through greater access, understanding and community involvement in caring for historic places.
	Climatic Factors	+	HE Policy encourages awareness of environmental conditions and supports adaptive, climate-positive behaviour
	Biodiversity, Flora, Fauna	+	HE Policy fosters appreciation of natural places, creating shared benefits for habitats and species.
	Air, Soil and Water	?	Increased access may raise visitor traffic; impacts are uncertain but can be mitigated through planning controls (e.g. SPPS).
	Cultural Heritage	++	Exploring the potential for quality historic places to support wellbeing has a highly positive effect on cultural heritage by strengthening recognition that caring for good places enhances wellbeing, increasing public desire to safeguard both tangible and intangible heritage.

6.5.2 Policy Aim 8: Evolving our shared understanding through access to research, surveys, records, artefacts and archives

Alternatives:	• Do Nothing : This option misses the opportunity to place government in a leadership role in helping communities access information, archives, artefacts and advice about their heritage assets. It offers no mechanism for coordinated or improved information management and does not meet the UK's obligations under international conventions such as the Valetta Convention. • Rely on the HCC Programme Museums Policy: While Museums Policy could consider artefact storage, this is linked to archaeological licensing managed by HED, and the Minister for Communities remains the statutory Keeper of the Records. Outsourcing to an ALB could complicate rather than improve access. This option also fails to meet the wider need to maintain up-to-date records, surveys and lists of buildings and monuments. • Transfer designation powers to local councils: Moving responsibility for listing to councils is not viable. Statutory listing powers lie with the Department for Communities, and no council has developed local lists. Councils currently lack the resources and expertise required, and this option would require legislative change, potentially without proof of improving outcomes.
Selection:	Evolving our shared understanding through access to research, surveys, records, artefacts and archives • A joined-up, long-term approach is needed to ensure information, records and knowledge about the historic environment are connected, accessible and directed to the point of need. • <i>'Community-based heritage conservation refers to the increasingly popular activity of coming together with members of the community to research local historical 'assets'. These could be associated with events, stories or moments linked with local places, including political movements, past professions, or local historical figures, as well as physical places themselves, such as walking trails, and cemeteries. It implicitly involves developing a closer relationship with one's local area and is potentially open to everyone, regardless of locality. Sometimes it involves 'preserving' an asset from harm – that is harm to its significance, not simply its fabric. It also typically involves the creation of cultural 'products' to conserve such heritage such as voice recordings of oral histories, poster exhibitions, heritage trails maps, books and murals.'</i>²³⁶ A joined up policy within the HCC Programme can encourage this connection to intangible heritage. • The by-product of being informed about our historic environment is good decision making²³⁷. In many cases, it's only when people enjoy learning what is distinct and relevant about their own place that they begin to consider its heritage

²³⁶ [Heritage, health and place: The legacies of local community-based heritage conservation on social wellbeing - ScienceDirect](#)

²³⁷ [Managing Change in World heritage Sites in Wales](#)

	value. Usually then, they also want to look after it²³⁸ - HE Policy can support this by promoting initiatives that improve public understanding and encourage stewardship • HE Policy can build high-level partnerships, remove barriers to advice, and ensure that information and guidance about heritage is easily accessible to all users—supporting better decision-making and empowering communities to care for their assets. • HE Policy can set out a long-term plan for recording, updating and making heritage information and archives available equitably and appropriately. • The HCC Programme offers opportunities to align Museum, Culture and Archive Policies with the Historic Environment, ensuring a coordinated approach to knowledge, access and interpretation.		
Potential for Monitoring: HEADLINE METRICS	BRIGHTER FUTURES - New Stat - % HERoNI, NMNI, PRONI records and artefacts accessible to public – physically, digitally		
Potential for Monitoring: SUPPORTING METRICS	• Existing Stat..Total number of Historic Buildings recorded (undesigned) • Existing Stat..Total number of Historic Monuments recorded (undesigned) • Existing Stat..Total number of Industrial heritage sites recorded (undesigned) • Existing Stat..Total number of Defence Heritage sites recorded • New Stat - Number of Thatch and TUT • New Stat - Number of vernacular records • Existing Stat - Extent of NI surveyed for listing as % of NI completed • Existing Stat - Numbers of Arch excavation Reports in HERoNI • Existing Stat - Amount spent on Research – Through the Historic Environment Fund (HEF)		
Effects on SEA Objectives:	Material Assets	++	Improved access to information, research and records supports better interpretation, care and management of assets, helping to reverse decline in their condition.
	Landscapes / Seascapes	++	Greater understanding of the historic environment strengthens protection of landscape and seascape character, supporting distinctiveness and scenic value.
	Population / Health	+	Helping communities understand their own places enhances pride, wellbeing and life chances through stronger local identity and informed engagement.
	Climatic Factors	+	Research, innovation and monitoring improve understanding of climate impacts on heritage, contributing positively to adaptation and resilience.

²³⁸ [English Heritage Strategy 2005-2010](#)

	Biodiversity, Flora, Fauna	+	Increased knowledge of the relationship between heritage and natural systems supports better stewardship of habitats and biodiversity.
	Air, Soil and Water	0	Increased access to knowledge is unlikely to have a significant direct effect on air, soil or water.
	Cultural Heritage	++	Better identification, research and understanding of heritage assets strengthens their protection and enhances people's desire to value and care for them – a virtuous circle.

6.5.3 Policy Aim 9: Reaching out: supporting heritage education and activity for inspiration, learning and enjoyment

Alternatives:	• Do-nothing/Business as Usual – there are several non-profit/charitable/voluntary heritage organisations such as the National Lottery Heritage Fund, Architectural Heritage Fund, National Churches Trust and Ulster Architectural Heritage and the Rural Community Network who run fixed term projects with elements of heritage activity tied to community and capital projects, supporting diversity and inclusivity. These rely on short-term resources/funding. Whilst successful, they sit in isolation and are not part of an overall high-level, targeted, measurable and joined up strategy to widen access to heritage activity in NI.
Selection:	Reaching out: supporting heritage activity for inspiration, learning and enjoyment • It is unrealistic to think that a short-term plan could have the desired impact needed to give equal access to heritage activity to everyone in Northern Ireland. • An overarching HE Policy which supports but also includes goals around heritage activity, inclusion and diversity activity over a long-term, 10-year period should have long term, cumulative impact on access to heritage activity across ability, socio economic profiles and ethnic/religious backgrounds, building up access over time and with synergies across education and community heritage aims; as a high level priority across the heritage sector. • Taking a long-term view offers opportunity to be more wholistic, reaching out to people who don't normally get involved, monitoring activity using metrics and setting targets. • Synergies are possible with a higher level NI Government Policy, for example HE Policy aims to use heritage assets as a could mean that heritage volunteering and experiences could contribute to wellbeing and health, as well as tourism and skills for the future. • Long-term HE Policy can also capitalise on the trend towards heritage activity which is growing through the next generation – in 2022 70% of young people had engaged with heritage²³⁹. • HE Policy can embed climate literacy in heritage interpretation, education, and outreach—using heritage to tell the story of climate change and resilience. • HE Policy could support the actions as identified in Archaeology 2030 engagement and Outreach working group
Potential for Monitoring:	BRIGHTER FUTURES - % of adults and young people in Northern Ireland who have visited a place of historic interest (by age)

²³⁹ [Experience of culture, arts and heritage by young people in Northern Ireland 2022 | Department for Communities](#)

HEADLINE METRICS	There is potential for this aim be amalgamated with Supporting inclusive and diverse access to historic places for everyone, Emphasising the contribution of our historic places to peace - cultural identity, community cohesion, good relations and healing through heritage.		
Potential for Monitoring: SUPPORTING METRICS	% of adults with a disability to have visited a place of historic interest within the previous year (NISRA) % of men and women who had visited a place of historic interest within the previous year (NISRA) % adults with dependants to have visited a place of historic interest (NISRA) - New Stat - There is currently no statistical data available relating to racial group status and the historic environment - New Stat - There is currently no statistical data available relating to sexual orientation and the historic environment. - Number of visits by schools to State Care Monuments as an annual figure (Young people survey?) - Number of visitors total to State Care sites - Number of visits by Level 3 students (UU, QUB, FHE) to HERONI - Access to HERONI, NMNI, PRONI - New Stat - Stat % HERoNI records and artefacts accessible to public – physically, digitally - Number of contacts with HERoNI (queries/visits) and HED Queries		
Effects on SEA Objectives:	Material Assets	++	Broadening participation in heritage activity brings assets back into everyday use and awareness, supporting their long-term care and value.
	Landscape	++	Heritage activity strengthens appreciation of landscape character and distinctiveness, creating positive synergies between heritage and landscape.
	Population / Health	++	Inclusive heritage activity enhances wellbeing, learning and life chances.
	Climatic Factors	+	Increased awareness of conservation and re-use supports positive climate behaviours.
	Biodiversity, Flora, Fauna	+	Heritage activity can deepen appreciation of natural spaces, encouraging stewardship of green areas and protected sites.
	Air, Water and Soil	?	Increased access may raise visitor traffic, though impacts are uncertain and can be managed through planning controls (e.g. SPPS)
	Cultural Heritage	++	Embedding diverse heritage activity in everyday life strengthens understanding, safeguarding and long-term protection of both tangible and intangible heritage.

6.5.4 Policy Aim 10: Supporting inclusive and diverse access to historic places for everyone

Alternatives:	• Do-nothing/Business as Usual – there are several small- and large-scale historic locations, monuments, buildings and places in Northern Ireland such as Conservation Areas, Cultural Landscapes, Council owned historic parks and gardens, etc. which provide free access to heritage. These sit in isolation and are not part of an overall high-level, targeted, measurable and joined up strategy to widen access to heritage in NI. A joined up overview could also maximise the links between natural and man-made heritage. • Focus on State Care access to heritage - DfC owns 167 State care monuments, however one fifth are in need of maintenance and several are closed. A State Care Investment Plan has been approved which could maximise the condition, access and use of these buildings but this plan has not yet been funded. Funding to access these sites eg. providing buses for schools could contribute to improving access. However, if a successful policy was put in place, people wouldn't need to travel to a State Care site to appreciate and enjoy heritage. Heritage assets in good condition all over Northern Ireland would have a wider impact across broader groups of people, contributing to free enjoyment of heritage including listed buildings, as part of the everyday.
Selection:	Policy Aim: Supporting inclusive and diverse access to historic places for everyone • The historic environment should be accessible and relevant to everyone who lives and visits NI, whatever their socio-economic background, race, religion, age, sexuality, gender, disability, or health. Like access to Heritage Activity, HE Policy could action a long-term and high-level policy view to tackle unequal access to historic places but also synergise with care of heritage assets and community access, access to green spaces and ownership of heritage assets in local communities – buildings and monuments which are already found everywhere across Northern Ireland, for example in areas of deprivation. • Having been created by a diverse history, varied communities have shaped our culture and traditions; different historical influences have left their mark. This wide sphere of influence makes historic places relatable to a broad group of people, who should all have access to it. • The historic environment has the potential to function as a platform from which to celebrate diversity, instill pride and strengthen connections between the past, present and future, including the heritage of minority communities. HE Policy can contain high-level actions to realise this ambition.
Potential for Monitoring: HEADLINE METRICS	HEALTHIER LIVES - % of adults and young people in Northern Ireland who have visited a place of historic interest (by equality metrics (NISRA))

Potential for Monitoring: SUPPORTING METRICS	• % of adults with a disability to have visited a place of historic interest within the previous year (NISRA) • % of men and women who had visited a place of historic interest within the previous year (NISRA) • % adults with dependants to have visited a place of historic interest (NISRA) • New Stat..There is currently no statistical data available relating to racial group status and the historic environment • New Stat..There is currently no statistical data available relating to sexual orientation and the historic environment • Number of visits by schools to State Care Monuments as an annual figure (Young people survey?) • Number of visitors total to State Care sites • Number of visits by Level 3 students (UU, QUB, FHE) to HERONI • Access to HERONI, NMNI, PRONI • New Stat - Stat % HERoNI records and artefacts accessible to public – physically, digitally • Number of contacts with HERoNI (queries/visits) and HED Queries		
Effects on SEA Objectives:	Material Assets	++	Increased and more diverse access encourages investment and reuse of heritage assets, supporting high-quality places and long-term care.
	Landscape	++	Wider access strengthens appreciation of landscape character and distinctiveness, creating positive synergies between heritage and landscape.
	Population / Health	++	Inclusive access to historic places improves wellbeing, learning and life chances.
	Climatic Factors	+	Greater engagement promotes conservation and reuse behaviours that support climate mitigation.
	Biodiversity, Flora, Fauna	+	Increased appreciation of natural places encourages stewardship of habitats and green spaces.
	Air, Water and Soil	?	More visitors may increase travel-related impacts, though these can be managed through planning controls (e.g. SPPS).
	Cultural Heritage	++	Embedding heritage in everyday experience strengthens understanding and long-term safeguarding of both tangible and intangible cultural heritage.

6.5.5 Policy Aim 11: Partnering with government departments, public bodies, and agencies, as well as asset owners, landowners and volunteers, to use the historic environment creatively

Existing Baseline:

- In the Listed Building Owners' Survey¹, when asked to specify the advantage of owning a listed building, out of the 52% who said that there are advantages, 95% said that it makes them feel part of history/heritage. The second most cited advantage was sense of pride, with 71% of respondents stating it.
- NISRA's survey tells us that 81% of adults in NI engaged in the arts in 2024/25²⁴⁰
- In 2024/25 42% of adults in NI visited a museum or science centre (26% visited a National Museum)
- IN 2024/25 23% used the public library service
- The NI Architecture and Built Environment Policy describes links between designing good places and using the Historic Environment; this policy is currently being re-drafted.

Environmental Problems:

- Links between Historic Environment and Landscape Policy were weakened when HED was separated from NIEA in 2014 and moved to a different department in 2015.
- There are no figures published for numbers of visitors to HERoNI or number of online accesses to information which can be related to PRoNI or museums/archive access.
- There is no strategy at present to join up for example thematic information like genealogy which touches on buildings, graveyards and public records with tourism, often of mutual interest
- There is no overarching strategy (though one is under development as part of HCC) to connect the Arts to Built heritage – for example through storytelling, music and visual arts. Projects or events which do this are most effective in rural areas according to the Rural Community Network.
- There is no promotion of information in Historic Environment Archives to local government, schools or businesses despite this being a free service

²⁴⁰ [Experience of culture, arts and heritage by adults in Northern Ireland](#)

- There is no formal relationship between the Arts Council, Libraries NI, Museums Council and the Historic Buildings or Monuments Councils in NI ;there is no formal relationship between these councils and local councils or the Strategic Investment Board (SIB)

Alternatives:	• Do-nothing/Business as Usual – during the Covid-19 emergency, it was recognized that a lack of policy around the Arts and Historic Environment made decision-making a challenge. ‘Do-nothing’ would not address this challenge.
Selection:	• Pride in place is a fundamental outcome of looking after, understanding and celebrating heritage – this has a virtuous circular effect in that this means there is more desire to look after heritage – having longer-term, cumulative benefit for quality of places: the Listed Building Owners’ survey told us that when people value their assets, this correlates with looking after them. Activity to help people understand and enjoy their assets can have a strong impact on condition – having a wider impact on places, landscapes and seascapes. • On 3 July 2024 Minister Lyons announced a new approach to provide, for the first time, a comprehensive collection of culture-related policies in Northern Ireland. Under the heading of “Heritage, Culture and Creativity”, this programme will address actions to conserve, protect and promote our cultural heritage and historic environment; and to encourage, support and develop the curiosity, active engagement and creativity it helps to inspire. • A high-level central government HE Policy can best support people to feel pride of place. Heritage places - towns, landscapes, seascapes, places like Dunluce, Carrickfergus Castle and Devenish - are a barometer of collective pride in place. They represent an essential value that we have in ourselves. This is why they are a big part of how visitors understand and experience Northern Ireland. We are representing ourselves through the development and showcasing of these places. We are representing ourselves through equal and free access to them. • A high-level central government HE Policy can best support people to enjoy and understand our historic environment more through links in Policy to architecture and the built environment, arts, museums libraries Policies, and the personal culture, traditions and stories associated with places in NI through local councils and networks. • Creative tools particularly inspire children and young people, awakening their interest and involvement in their shared places and shared history, contributing to wider PfG aims. For example – ‘<i>Buildings themselves are only part of the story. The way that industrial heritage connects to local pride is also about local story-telling and family history and folklore.</i>’²⁴¹; connecting with the work that their children’s grandparents and great grandparents did. Using an existing asset – heritage and historic archives – to also promote or locate arts venues, libraries and museums and their activity creates mutual benefit, promoting access to more than one positive for people. ‘<i>..history feeds into the culture and the culture feeds into identity.</i>’²⁴²

²⁴¹ [Heritage and Civic Pride: Voices From Levelling Up Country | Historic England](#)

²⁴² [Heritage and Civic Pride: Voices From Levelling Up Country | Historic England](#)

	To further this aim, HE Policy could make the most of the potential NI's historic environment offers because it can spark creativity and imagination – for example as locations for artists' or writers' retreats, and also be a profitable asset, for example for film sets.		
Potential for Monitoring: HEADLINE METRICS	CULTURAL & CREATIVE COLLABORATION New Stat - Number of creative businesses in NI based in Conservation areas and listed buildings New Stat - Number of Heritage Skills, Conservation and Adaptation awards in NI		
Potential for Monitoring: SUPPORTING METRICS	- LB and Monuments Owners' Forum and survey feedback - Creating networks - Numbers of Heritage organisations - Heritage Volunteers – numbers and type £ annual revival funding (HEF) £ annual Arts council funding for heritage events £ annual funding by NMNI for heritage events £ generated by Screen NI for films set in NI (heritage)		
Effects on SEA Objectives:	Material Assets	++	Partnerships that build pride of place strongly support protection, maintenance, reuse and enhancement of historic assets.
	Landscape	++	Increased pride and awareness reinforces protection, character, distinctiveness and scenic quality of landscapes.
	Population / Health	++	Inspires learning, enjoyment and stronger connection to places, improving physical and mental wellbeing.
	Climatic Factors	+	Pride-based care supports maintenance and retention of assets and encourages understanding of climate relationships.
	Biodiversity, Flora, Fauna	+	Enhances appreciation of natural heritage and its links with historic places, supporting positive stewardship.
	Air, Water and Soil	?	Potential for increased visitor traffic; effects uncertain but manageable through planning controls (e.g. SPPS).
	Cultural Heritage	++	Strongly supports safeguarding, appreciation and restoration of heritage, reinforcing cultural identity and pride.

7 Peace

7.1 Part 1- Peace – Relationship with other plans, programmes and strategies

SEA Topic - Population / Health - Peace				
Protection				
Cultural Heritage in Northern Ireland is treated as a human rights issue, ensuring that communities' identities, traditions and expressions are respected and safeguarded. These rights are protected through: • European Convention on Human Rights (ECHR Article 10)²⁴³ • The Good Friday (Belfast) Agreement²⁴⁴				
International Convention, declaration or charter	Legislative basis, environmental objectives or requirements of the plan or programme	How objectives and requirements of other plans or programmes might be taken on board in Historic Environment Policy (HE Policy) or how HE Policy might impact other plans, policies or programmes	Impacts on HE Policy	HE Policy may Impact outcomes
The Paris Convention (1954)	This convention recommends best practice and doctrine. Also known as the Paris Convention of 1954, its main relevant obligations are: • Development of the national contribution to the common cultural heritage of Europe (article 1) • Safeguarding objects of European cultural value placed under government control (article 5)	Historic Environment Policy will support and enhance the objectives of this Charter in Northern Ireland, with aims to safeguard heritage, and promote equal and common access to heritage, for people's benefit.	✓	

²⁴³ [European Convention on Human Rights](#)

²⁴⁴ [The Belfast Agreement - GOV.UK](#)

	Ensuring reasonable access to such objects (article 5) The UK has been a signatory of the Paris Convention since 1954.			
2003 UNESCO Convention on the Safeguarding of Intangible Cultural Heritage (2003)	This Convention, ratified by the UK in 2024 recognizes traditional craftsmanship, oral traditions and expressions, performing arts, social practices, rituals and festive events, knowledge and practices related to nature and the universe.	HE Policy will support this convention, including a commitment to an increased inventory of Northern Ireland's traditions, comprising practices inspired by diaspora communities, and to better safeguarding of the most at-risk traditions and crafts. The link between tangible and intangible heritage is self-evident; supporting activity which uses, celebrates and understands historic assets and places will support and enhance the objectives of this Convention to protect intangible cultural heritage, but also for people to interpret, enjoy and understand tangible heritage.	✓	
2017 ICOMOS Delhi Declaration on Heritage and Democracy	A doctrinal charter reflecting the commitment by ICOMOS to Heritage and Democracy as ingredients of a people-based approach to sustainable development. Heritage is a starting point for a meaningful and equitable future that secures and celebrates diversity, social engagement, equality and justice for all cultures. The charter outlines the 'duty to conserve the significance of the multicultural, multidimensional heritage resources we have inherited and hand them down to following generations. Engaging and training new generations in the understanding and protection of the inherited values of our living and shared heritage will sustain the plural legacies of the past'.	HE policy will support this declaration through the commitment to respect values, significance, authenticity in the management of heritage resources; providing guidance to inform practice in the education and management of heritage resources; heritage as a resource of all the people, by all the people, for all the people; increasing democratic community engagement; respecting the continuity of living heritages- safeguarding heritage resources between communities and cultures Through the work on heritage skills, recognition and support will be given to the people and communities who embody cultural knowledge and skills for the long term perpetuation of living heritage.	✓	

Other plan/programme or strategy	Legislative basis, environmental objectives or requirements of the plan or programme	How objectives and requirements of other plans or programmes might be taken on board in Historic Environment Policy (HE Policy) or how HE Policy might impact other plans, policies or programmes	Impacts on HE Policy	HE Policy may impact outcomes
Programme for Government (PfG) 2024-2027²⁴⁵ ‘Our Plan: Doing What Matters Most’	PfG includes a commitment to peace: <i>‘We will build on the successes of the past twenty-six years to make sure that our peace is meaningful and prosperous for everyone here. By focusing on People, Planet, and Prosperity, we will shape a fairer and more peaceful society.’</i>	Historic Environment Policy has the potential to shape environmental actions which support a peaceful future. For example, celebrating identity and pride whilst promoting and making available information about history and places which stretch back millennia to the present day. HE Policy will support preserving heritage assets which may be needed in the future to understand even the more recent past, such as remaining evidence of ‘the Troubles’.	✓	✓
About Together: Building a United Community (T:BUC)²⁴⁶	<i>‘The ‘Together: Building a United Community’ (T:BUC) Strategy, published on 23 May 2013, reflects the Executive’s commitment to improving community relations and continuing the journey towards a more united and shared society.’</i>	The T:BUC Strategy outlines how government, community and individuals are working to build a united community and achieve change against the following key priorities: • our children and young people • our shared community • our safe community • our cultural expression Each of the four key priorities also has a set of tangible and practical commitments. The Strategy is delivered through T:BUC funded programmes, which HE Policy will support – for example the ‘Urban Villages Programme’, the ‘Peace Plus Programme’ and good relations programmes. In particular, the strategy supports actions in contested spaces, and	✓	✓

²⁴⁵ [Programme for Government 2024-2027 ‘Our Plan: Doing What Matters Most’ | The Northern Ireland Executive](#)

²⁴⁶ [About Together: Building a United Community \(T:BUC\) | The Executive Office](#)

		options to develop shared space in a rural context. Historic buildings and spaces can provide neutral venues and spaces with shared senses of history and common ground which stretch beyond modern memory.		
--	--	---	--	--

7.2 Part 2 – Peace - Environmental Characteristics

7.2.1 Peace - Existing Baseline

- *‘The benefits of social interaction, creative opportunities and sharing memories may contribute towards social cohesion through sharing experiences and developing new connections. This has significant potential for the historic environment, especially in community and place-based initiatives.’*²⁴⁷
- The relationship between the historic environment and social capital was demonstrated in a recent study by Mak et al (2023), which found that people living in places with greater historic built environment experience higher levels of personal relationships, social network support, and civic engagement.²⁴⁸ This research was not specific to Northern Ireland which has its own unique circumstances.

7.2.2 Peace - Environmental problems

- Northern Ireland’s ‘heritage’ is in some cases contested. There can be a reluctance to engage with some aspects of our historic environment because of those associations²⁴⁹. These circumstances are recognised but we are not currently widely using heritage or heritage activities to address them.
- The unique possibilities for NI’s historic environment to be used as a tool for peace, community cohesion, and good relations is shown in other places – but it has not yet been fully explored to its full potential.

²⁴⁷ [Wellbeing and Historic Environment: Why Bother? | Historic England](#)

²⁴⁸ [The Role of Heritage in Bringing People Together | Heritage Counts | Historic England](#)

²⁴⁹ ‘Conserving the past, protecting the peace’ Liam McQuillan - Heritage Under Pressure – Threats and Solutions – Oxbow Books (Editors Dawson, James and Nevell, Oxford, 2019)

7.3 Part 3 – Peace - Population and Human Health – HE Policy Impact

SEA topic	SEA Objective
Population and Human Health	• promote healthy living • protect and enhance human health • reduce and prevent crime, reduce fear of crime

7.3.1 Potential impact of HE Policy on Peace

- Implementation of HE Policy is unlikely to have significant negative effects on Peace in Northern Ireland.
- HE Policy could support a future where NI's **historic environment is strongly associated with building social connections**.
- The relationship between the historic environment and social capital was demonstrated in a recent study²⁵⁰ which found that **people living in places with greater historic built environment experience higher levels of personal relationships, social network support, and civic engagement**.²⁵¹ This is of particular resonance for a post-conflict society such as Northern Ireland, where communities can together explore shared heritage, contributing to **increased respect and community cohesion**.
- HE Policy can encourage people to create **shared, inclusive narratives**, emphasising common heritage and highlighting elements of local history that are **shared by all communities, such as natural beauty, cultural diversity and collective achievements**.
- The Historic Environment is a strong place to support the T:BUC²⁵² Strategy– for example the 'Urban Villages Programme', the 'Peace Plus Programme' and good relations programmes. HE Policy can support actions in contested spaces, and options to develop shared space in a rural context. Historic buildings and spaces can provide neutral venues and spaces with a shared sense of history and common ground which stretches beyond modern memory.

²⁵⁰ [Listed Buildings Survey; Scheduled Historic Monuments Survey](#)

²⁵¹ [The Role of Heritage in Bringing People Together | Heritage Counts | Historic England](#)

²⁵² [Together: Building a United Community \(T:BUC\) | The Executive Office](#)

7.3.2 Potential Negative Effects and Mitigation

- **Potential effect:** It is possible that preserving heritage associated with contested spaces can ‘bring up the past’, or lead people to feel that certain aspects are being spotlighted or celebrated.
- **Mitigation:** Recent projects such as those to provide records in PRONI for Mother and Baby and other institutions demonstrate that if carefully managed, records and tangible artefacts, buildings and spaces can be the first step in understanding and working through difficult historical events. Partnerships with TEO and others could ensure that contested spaces are also healing spaces.

7.3.3 Likely Impact without HE Policy

- The relics of the Troubles have been protected in limited locations such as the Maze Long Kesh site, but a wide-reaching comprehensive built environment record of ‘the Troubles’, which could be protected until it is needed, for education and good relations has not yet been carried out, meaning that opportunities have not yet been fully explored for protection and healing through heritage. Without HE Policy, this physical record is likely to be underused.

7.4 Part 3 - Suggested HE Policy Aims – Peace

7.4.1 Policy Aim 12: Emphasising the contribution of our historic places to peace - community cohesion, good relations and healing through heritage

Alternatives:	• Do-nothing/Business as Usual – Historic places aren’t always viewed the same way by everyone. Different people place more importance on different aspects of heritage that are personal to them. Some people connect to their heritage through traditions, music and language. Some place more emphasis on tangible structures; there are different definitions of ‘heritage’. Northern Ireland’s ‘heritage’ is in some cases contested. There can be a reluctance to engage with some aspects of our historic environment because of those associations²⁵³. These circumstances are recognised but we are not currently using heritage or heritage activities to address them. Some small scale projects show potential, like those by the Rural community Network however they are time and budget limited: <i>‘Most recently, we have been developing a community mentor programme, connecting communities up who ... we think could benefit from a community heritage mentor from a rural area. This mentor programme will allow communities to feel more connected, less isolated ... and for two rural areas to experience another communities’ place, story and people.’</i>²⁵⁴
Selection:	Policy Aim: Emphasising the contribution of our historic places to peace - cultural identity, community cohesion, good relations and healing through heritage. • To work towards this aim, HE Policy could support a future where NI’s historic environment is strongly associated with building social connections. • <i>‘Social capital is the glue that binds together communities otherwise at risk of coming unstuck.’</i>²⁵⁵ The Office for National Statistics (ONS) defines social capital as <i>“the extent and nature of our connections with others and the collective attitudes and behaviours between people that support a well-functioning, close-knit society”</i>²⁵⁶. • The relationship between the historic environment and social capital was demonstrated in a recent study²⁵⁷ which found that people living in places with greater historic built environment experience higher levels of personal relationships, social network support, and civic engagement.²⁵⁸ This is of particular resonance for a post-conflict

²⁵³ ‘Conserving the past, protecting the peace’ Liam McQuillan - Heritage Under Pressure – Threats and Solutions – Oxbow Books (Editors Dawson, James and Nevell, Oxford, 2019)

²⁵⁴ Emma McAleer, Rural Community Network

²⁵⁵ [Andy Haldane: Social capital is the glue that binds communities together | The National Lottery Community Fund](#)

²⁵⁶ [Social capital harmonised standard – Government Analysis Function \(civilservice.gov.uk\)](#)

²⁵⁷ [Listed Buildings Survey; Scheduled Historic Monuments Survey](#)

²⁵⁸ [The Role of Heritage in Bringing People Together | Heritage Counts | Historic England](#)

	society such as Northern Ireland, where communities can together explore shared heritage, contributing to increased respect and community cohesion. We will encourage people to create shared, inclusive narratives, emphasising our common heritage and highlighting elements of local history that are shared by all communities, such as natural beauty, cultural diversity and collective achievements. • The Historic Environment is a strong place to support the T:BUC Strategy– for example the ‘Urban Villages Programme’, the ‘Peace Plus Programme’ and good relations programmes. HE Policy can support actions in contested spaces, and options to develop shared space in a rural context. Historic buildings and spaces can provide neutral venues and spaces with a shared sense of history and common ground which stretches beyond modern memory. • HE Policy can support the suggestions in the for re-use/meanwhile use/re-visioning, exploring the potential for cheap / reduced rents for innovative uses- potentially marketing to the youth, culture and creative sectors with potential for good targeted outcomes relating to social value and peacebuilding through shared spaces for innovation		
Potential for Monitoring: HEADLINE METRICS	EQUAL SOCIETY • Religious belief – % of adults from the Protestant/Catholic community to visit a place of historic interest within the previous year. • New Stat - £ Contribution of NI Heritage Sector to Society – Source? Creation of a Universal Social Value tool		
Potential for Monitoring: SUPPORTING METRICS	• New Stat..There is currently no statistical data available relating to the public’s view on the historic environment in Northern Ireland – this should be developed as in other parts of UK²⁵⁹		
Effects on SEA Objectives:	Material Assets	+	Recognising heritage’s role in peace can increase public value and demand for high-quality, well-cared-for places and assets.
	Landscapes / Seascapes	+	Shared heritage narratives can support protection of landscape character, distinctiveness and scenic quality.
	Population / Health	++	Strong positive effects through improved access, sense of value, community participation, better environments, and enhanced wellbeing
	Climatic Factors	+	Community-driven reuse of heritage assets supports carbon savings and avoids demolition-led emissions.
	Biodiversity, Flora, Fauna	+	Shared appreciation of heritage and natural spaces can encourage mutually supportive stewardship.

²⁵⁹ [What’s Your Heritage? | Historic Environment Scotland | History](#)

	Air, Water and Soil	?	Increased access may raise traffic or visitor pressure, though manageable through existing planning controls (e.g. SPPS).
	Cultural Heritage	+	Greater recognition of heritage's peace-building value supports protection of tangible and intangible cultural assets.

8 Cultural Heritage

8.1 Part 1 – Cultural Heritage – Relationship with other plans, strategies and programmes

This section comes at the end of all the others, because as shown, **all of the SEA Topics have relevance for the Historic Environment** which falls most immediately under the SEA Topic '**Cultural Heritage**'.

The list of relevant plans, strategies and programmes listed below are **in addition to those under the headings of Places, Natural Places, Planet, and People above.**

SEA Topic - Cultural Heritage	
Protection	
Relevant legislation:	
• Planning Act (NI) 2011 • Planning Policy Statements (PPS – in particular PPS6, PPS16, PPS21). It should be noted that the PPS's will be superseded by Local Development Plans when they are adopted. • Historic Monuments and Archaeological Objects (Northern Ireland) Order 1995 • Protection of Military Remains Act 1986 • Protection of Wrecks Act, 1973 • Merchant Shipping Act 1995 • The Fisheries Act (Northern Ireland) 1966 • Treasure Act 1996 • UK Marine and Coastal Access Act 2009 • The Marine Act (NI) 2013 • The Climate Change Act 2022 • Dealing in Cultural Objects (offences) Act 2003 • The Finance Act 1976 (Conditional Exemption)	

International Convention, declaration or charter	Legislative basis, environmental objectives or requirements of the plan or programme	How objectives and requirements of other plans or programmes might be taken on board in Historic Environment Policy (HE Policy) or how HE Policy might impact other plans, policies or programmes	Impacts on HE Policy	HE Policy may impact outcomes
The Athens Charter for the Restoration of Historic Monuments (ICOMOS) (1931)	This Charter has no legal force but recommends best practice and doctrine. This was the first international agreement which placed responsibility on government to act in the care of the historic environment. Signatories agreed that it is essential that the principles guiding the preservation and restoration of ancient buildings should be agreed and be laid down on an international basis, with each country being responsible for applying the plan within the framework of its own culture and traditions.	Historic Environment Policy will support and enhance the objectives of this Charter in Northern Ireland, which set out the framework for protecting, conserving and enhancing the historic environment in the event of development and when under threat.	✓	
The Venice Charter for the Conservation and Restoration of Monuments and Sites (ICOMOS) (1964)²⁶⁰	This Charter has no legal force but recommends best practice and doctrine. It comprises a set of guidelines, drawn up in 1964 by a group of conservation professionals in Venice, that provides an international framework for the conservation and restoration of historic buildings, based on the principles of the Athens Charter.	Historic Environment Policy will support and enhance the strategic objectives of this Charter in Northern Ireland, focusing on standards and best practice for conservation and restoration of historic buildings, including the need for skilled people.	✓	
UNESCO World Heritage Convention Concerning the Protection of the World Cultural²⁶¹	This convention is legally binding. The UK ratified this Convention in 1972. The most significant feature of the 1972 World Heritage Convention is that it links together in a single document the concepts of nature conservation and the preservation of cultural properties. The Convention recognizes the way in which people	Historic Environment Policy will support and enhance the strategic objectives of this Convention in Northern Ireland, focusing on communities, awareness and protection of world heritage sites. In Northern Ireland there are currently two world heritage sites – the Giant's Causeway (a natural site) and Gracehill village a part	✓	

²⁶⁰ https://openarchive.icomos.org/id/eprint/432/1/Monuments_and_Sites_1_Charters_Petzet.pdf

²⁶¹ [Cultural heritage | UNESCO UIS](#)

and Natural Heritage (1972) ²⁶²	interact with nature, and the fundamental need to preserve the balance between the two. The ‘five C’s’ are the strategic objectives adopted by the World Heritage committee in 2002 and 2007: • Credibility - Strengthen the Credibility of the World Heritage List, as a representative and geographically balanced testimony of cultural and natural properties of outstanding universal value; • Conservation - Ensure the effective Conservation of World Heritage properties; • Capacity-building - Promote the development of effective Capacity-building measures, including assistance for preparing the nomination of properties to the World Heritage List, for the understanding and implementation of the World Heritage Convention and related instruments; • Communication - Increase public awareness, involvement and support for World Heritage through communication; • Communities. - Enhance the role of communities in the implementation of the World Heritage Convention.	of the transnational Moravian Church Settlements , World Heritage Site. However, amplifying and making the most of the transboundary significance of NI heritage assets will be one of the aims of HE Policy.		
The Granada Convention (1985) for the Protection of	This convention is legally binding. The European Convention for the Protection of the Archaeological Heritage (revised) was originally signed by the UK in 1969	Historic Environment Policy will align with the Convention’s objective to protect archaeological heritage, but also to promote the wider understanding		

²⁶² [1972, Convention Concerning the Protection of the World Cultural and Natural Heritage – ICOMOS CIVVIH](#)

the Archaeological Heritage of Europe (revised - The Valletta Convention on Protection of Archaeology - 1992) 263	but revised in Valetta in 1992. It reflects the nature of threats to archaeological heritage, from unauthorised excavations and major construction projects. The revised text makes the conservation and enhancement of the archaeological heritage one of the goals of urban and regional planning policies. Signatories (including the UK) promise to allow the input of expert archaeologists into the making of planning policies and planning decisions. The Protection of the Architectural Heritage, Granada (1985) (Article 14) requires measures for the identification, protection, restoration, maintenance, management and promotion of the architectural heritage and the supply of information between the State, the regional and local authorities, cultural institutions and associations, and the public. The Protection of the Archaeological Heritage (revised) Valetta (1992), It defines archaeological heritage and the signatories promise to make and maintain an inventory of such heritage and to legislate for its protection. The emphasis is on protection of sites for future study, the reporting of chance finds, the control of excavations and the use of metal detectors. Signatories (including the UK) also promise to allow the input of expert archaeologists into the making of planning policies and planning decisions	and appreciation of the historic environment, including public access and education to protect it through the valuing of archaeology, and the role that these material assets have in shaping places.		
---	---	--	--	--

²⁶³ [Convention for the Protection of the Archaeological Heritage of Europe \(revised\) \(Valletta, 1992\) - Culture and Cultural Heritage](#)

The Florence Charter 1982 (International Council on Monuments and Sites) requires responsible authorities to adopt appropriate measures for the identification, listing and protection of historic gardens	<i>An historic garden is an architectural and horticultural composition of interest to the public from the historical or artistic point of view... As such, it is to be considered as a monument. As a monument, the historic garden must be preserved in accordance with the spirit of the Venice Charter. However, since it is a living monument, its preservation must be governed by specific rules which are the subject of the [Florence] charter.</i>	Historic Environment Policy will support and enhance the strategic objectives of this Charter in Northern Ireland, reinforcing the protection of historic gardens as heritage assets – but also their contribution to wellbeing, place making and biodiversity.		
Other plan/programme or strategy	Legislative basis, environmental objectives or requirements of the plan or programme	How objectives and requirements of other plans or programmes might be taken on board in Historic Environment Policy (HE Policy) or how HE Policy might impact other plans, policies or programmes	Impacts on HE Policy	HE Policy may impact outcomes
Conservation Principles (DfC)²⁶⁴	The ‘Conservation Principles’ guidance sets out a best practice conservation framework for all aspects of decision making affecting NI’s historic environment. Part 1 ‘Conservation Principles’ Guidance for the sustainable management of the historic environment in Northern Ireland’ sets out the six key guiding conservation principles and explains how significance is central to conservation, how to assess it, and use it as a tool to manage change. Part 2 ‘Applying the Conservation Principles’ Guidance for the sustainable management of the historic	HE Policy and actions flowing from HE Policy will align with these key principles, helping to clarify and expand on how these principles can be applied to the historic environment in a policy context: Principle 1 - The historic environment is of value to us all Principle 2 - Everyone should be able to participate in sustaining the historic environment Principle 3 - Understanding the significance of heritage assets is vital	✓	✓

²⁶⁴ [Conservation Principles guidance | Department for Communities](#)

	environment in Northern Ireland' sets out the different types of changes impacting a heritage asset. It explains how the conservation principles can guide decision making for each change, to achieve best conservation outcomes.	Principle 4 - Heritage assets shall be managed to sustain their significance Principle 5 - Decisions about change shall be reasonable, transparent and consistent Principle 6 - Documenting and learning from decisions is essential		
Archaeology 2030	Archaeology 2030: A strategic approach for Northern Ireland was launched in December 2020 and actively engages with the key issues and challenges that the archaeological sector in Northern Ireland faces. The strategy sets out a strategic approach and series of recommendations as to how we, as a society, develop our engagement with, and understanding of, our archaeology. The strategic objectives of Archaeology 2030 are: • Adopting Best Practice • Making Knowledge accessible • Sustaining the historic environment • Engaging and enriching peoples' lives Developing learning and skills	Historic Environment Policy will align with and augment the Archaeology 2030 objectives which support the archaeology sector to better protect and use archaeological heritage for everyone's benefit. HE Policy may influence future NI Archaeology Strategies to follow or flow from Archaeology 2030.	✓	✓
Draft Tourism Strategy for NI – 10-year plan – Department for Economy	The draft Tourism Strategy for Northern Ireland: 10 Year Plan sets out a vision and mission for the growth of the tourism sector in Northern Ireland over the next decade. <i>'It will be a key enabler of the 10x Economic Vision to help position the region internationally as an attractive place to visit, making our visitors feel welcome whilst at the same time helping to make the lives better of all our citizens. It will seek to deliver on the objectives</i>	Historic Environment Policy aims will support people and places to conserve, maintain, enhance, understand and enjoy their heritage assets, contributing to the Tourism Strategy vision. The Heritage, Culture and Creativity Strategy of which Historic Environment Policy is a component part is	✓	✓

	<i>of 10x by generating economic growth that is sustainable, inclusive and innovative.'</i> The Vision of the Strategy is to: <i>Establish Northern Ireland as a year-round world class destination which is renowned for its authentic experiences, landscape, heritage and culture and which benefits communities, the economy and the environment, with sustainability at its core.</i> The draft tourism strategy reflects the ambition to widen the appeal of sub-regional locations to visitors, to strengthen the domestic market, and to enrich the lives of residents all year round.	listed as a 'Key Strategy or Policy' within the Draft Tourism Plan.		
The Protocol for the Care of the Government's Historic Estate ²⁶⁵	The Protocol sets out what the NI Executive requires from all central government departments and agencies. Under the Protocol, Northern Ireland Government is obligated to setting a good example in the care of its historic estate and the Protocol standards are widely understood and accepted to be a benchmark of good conservation management for public bodies. All government departments report biennially to DfC on their heritage assets who then compile a report which is submitted to the Communities Committee of the NI Assembly. Five reports on the management of the government's historic estate have been produced to date. Currently local councils do not report.	There is opportunity for the principles of the Protocol to be widened out beyond central government, and for government to show leadership in the care of their historic estate. There is also opportunity for the protocol to inform the management of heritage assets, which can be supported and promoted by HE Policy, including the use of consultants and contractors who are appropriately qualified and experienced, the practice of carrying out regular condition surveys, identifying and recording assets and ensuring a high standard of design in any new work and in the alteration of the historic environment. This relationship with built environment can be further recognised between the Policy and the Architecture and Built Environment policy.	✓	✓

²⁶⁵ [Protocol for the Care of the Government Historic Estate | Department for Communities](#)

8.2 Part 2 – Cultural Heritage - Environmental Characteristics

SEA topic	SEA Objective
Cultural Heritage	• preserve historic buildings, archaeological sites and other culturally important features • create spaces and buildings that work well, wear well and look well • value and protect diversity and local distinctiveness

8.2.1 Cultural Heritage - Existing Baseline (see also individual aims at 9.5.1, 9.5.2, 9.5.3, 9.5.4)

- The Culture, Arts and Heritage Taskforce report ‘Investing in Creative Delivery’ describes the culture arts and heritage sector as including:
 - The Historic Environment Record of NI, which includes information on, sites and monuments, excavations, historic buildings, industrial heritage, defence heritage, historic parks, gardens and demesnes, and maritime archaeology is maintained is made available through the Department for Communities Historic Environment Division’s HERoNI.
 - NI has 2 statutory heritage advisory bodies - Historic Buildings Council and Historic Monuments Council
 - Art forms such as music, literature, drama, dance, circus, craft, community arts, theatre, traditional arts, visual arts, and the individual artists, practitioners, freelancers, organisations, festivals, community groups and venues working, practising and volunteering in these and related fields. There are 9 Arts arm’s length bodies, 95 organisations and 6 major festivals supported annually by the Arts Council; there are 3 Creative Learning Centres and 3 film and television festivals supported annually by NI Screen
 - Museums - there are three National Museums in NI – the Ulster Museum, Cultra: the Uster Folk Museum & Ulster Transport Museum, and the Ulster American Folk Park; there are 36 local Museums
 - Libraries – there are 98 public libraries and 16 mobile libraries
 - Observatory and Planetarium (1 – Armagh Observatory and Planetarium)

- Languages, including those being supported through the development of an Irish Language Strategy and an UlsterScots Language, Heritage and Culture Strategy; and Sign Language – both British Sign Language (BSL) and Irish Sign Language (ISL) - and promotion of Deaf culture and identity. There are 2 cross-border language and cultural agencies (Foras na Gaeilge and the Ulster-Scots Agency) supporting and working with community and voluntary groups, delivery partners, schools, businesses, local councils, youth programmes, festivals, summer camps, and music, drama, arts and heritage groups; there are 19 organisations supported through DfC sign language partnership funding
- Archives which receive, preserve and make available public records and privately deposited materials. There are >3 million documents held by the Public Record Office of NI (PRONI), among archives of historical, social and cultural importance
- Creative Industries, which include advertising; architecture; arts and antiques; computer games; crafts; design; designer fashion; film; TV and radio; music.; performing arts; publishing; software/digital media. Some of these areas and wider creativity are also supported by screen culture and education initiatives led by NI Screen; there is 1 architecture & design review body supporting high quality urban and rural places; there are >200 community festivals

Historic Environment

- There are over 57,500 known Heritage Assets in HERoNI. The location of known and designated assets is available on a spatial dataset (HED Map Viewer). Information on these assets is retained in HERoNI.
- Archaeological archives, are dispersed throughout Northern Ireland. HERoNI maintains HED's collection produced through rescue and research excavations, mainly undertaken at NI's State Care Sites. Commercially excavated material mostly resides with the commercial sector. HED in partnership with NMNI are working towards a Collection Resource Centre, where material will be appropriately archived and made accessible for further research. Material under the care of HERoNI is available to consult.
- A 'Heritage Delivers'²⁶⁶ document was published by the NI Heritage Stakeholder Group (who represent Northern Ireland's heritage sector) in 2019 and again in 2026. These statistical reports described the breadth of evidence that Heritage is already 'delivering' on the ground for people in Northern Ireland. The strength of this delivery can be further demonstrated by the large number of plans and programmes that the historic environment and therefore HE Policy could impact. However, what is also notable is that there are many gaps in this evidence, and that further evidence is needed. These gaps have been described below.

²⁶⁶ [NI HERITAGE DELIVERS 2026 CASE STUDIES AND STATISTICS ON HOW HERITAGE BENEFITS NORTHERN IRELAND | Heritage Delivers](#)

- The Independent Assessment used to help inform the third UK Climate Change Risk Assessment²⁶⁷ (CCRA3) assesses 61 risks and opportunities from climate change to Northern Ireland, including to business, infrastructure, housing, the natural environment, our health and from the impacts of climate change internationally. Risks requiring action include '*Risks to cultural heritage*'.

²⁶⁷ [third UK Climate Change Risk Assessment](#)

The table below describes the current baseline for the historic environment in NI.

Baseline	Supporting data (where available)
There is legislation in place (See p.188) to protect buildings of special architectural or historic interest through statutory designation, placing them on the 'List', and Planning Policy to manage statutory consents to alter them, protecting them from unauthorised or inappropriate development. There is legislation in place to give emergency temporary protection to buildings which may qualify for statutory designation in the form of Buildings Preservation Notices (BPNs).	• The number of listed buildings at 31 March 2024 was 9,124. Some listings include multiple buildings, therefore, the total number of buildings protected in this way is slightly higher. This was an increase of 11 per cent compared to 31 March 2004. • There were just over 600 listed building consent applications in 2023- 2024, and 1400 further non-statutory applications affecting listed buildings or their settings. • There were 99 active listed building enforcement requests at 31 March 2024. • The location of known and designated assets is available on a spatial dataset (HED Map Viewer)
There is legislation in place (see p.188) to protect historic monuments through statutory designation (Scheduling),	• 186 Monuments in State care (March 2024) • 2,053 scheduled historic monuments (March 2024) Overall, there has been a 36 per cent increase in the number of scheduled monuments since 2001/02. • There are 15,100 Sites and Monuments (March 2024) (excluding State Care and scheduled monuments) • The location of known and designated assets is available on a spatial dataset (HED Map Viewer) • There were 6 known incidents of unauthorised change to scheduled monuments in 2023-24. • Scheduled Monument Consent must be sought and granted for proposed works which may alter or disturb the fabric of a Scheduled historic monument, its ground surface or setting. Many Scheduled historic monuments are located in rural areas and these owners tend to come from within the agricultural sector. Prior to 2004/05, applications for Consent ran at numbers below 30 per year. From 2006/07 to 2017/18, applications ranged from 45 to 68. Application numbers increased in 2018/19 and reached 97 in 2019/20, the highest number presented in the time series above. The number of applications for Consent in 2023/24 was 50, which is more in line with figures for years prior to 2018/19. • An increase in government and local council projects, such as trails and site infrastructure, to aid well-being and tourism activities, is one reason for the increase in numbers during the period 2018/19 to 2022/23.

Condition of Scheduled Monuments is being monitored and has remained steady	HED carries out regular condition monitoring on historic monuments. In March 2024 it was noted that there was no significant change to the relative spread of condition – around two thirds of monuments were in good to very good condition, with the remaining third in Poor to Very Poor condition. Overall, around 6% of monuments were in very poor condition. Work to update the HARNI (Heritage at Risk) register to comprehensively include monuments is underway to target work to reverse the decline of these most vulnerable monuments.
There is legislation in place (See p.188) to protect underwater and intertidal heritage (Marine Heritage/MH) through statutory designation, to manage statutory consents to alter them and protect them from unauthorised or inappropriate development	4 protected wrecks (March 2024) 832 Maritime Heritage Sites (incl in Scheduled Monument Record) 384 known wreck sites - The location of known MH assets is available on a spatial dataset (HED Map Viewer) - There were 23 Marine licensing applications in 2023-24
There is legislation in place (See p.188) to protect Conservation Areas (CAs) (as areas of special architectural or historic interest) from inappropriate development/demolition.	There are 60 Conservation Areas (CAs) in Northern Ireland.
There is Planning Policy (SPPS) in place to protect Historic Parks and Gardens (HPGs) as a non-statutory material planning consideration.	- There are 663 HPGs Grade A and A* - The location of HPGs is available on a spatial dataset (HED Map Viewer)
There is Planning Policy (SPPS) in place to consider Industrial Heritage (IH) as a non-statutory material planning consideration.	- There are 16,062 (March 2023) sites on the Industrial Heritage Record - 12,663 (24%) protected by statutory designation(s). - The location of known IH assets is available on a spatial dataset (HED Map Viewer)
There is Planning Policy (SPPS) in place to consider Defence Heritage (DH) a non-statutory material planning consideration.	4593 (March 2023) Defense Heritage Sites 324 battle sites A comprehensive Defence Heritage Survey was carried out in 2020-21 which identified a further 3855 structures from the previous total of 738 at March 2020.

	The location of known DH assets is available on a spatial dataset (HED Map Viewer)
There is Planning Policy (SPPS) in place to consider Areas of Archaeological Interest (ASAI) as a non-statutory material planning consideration. An ASAI designation affords these landscapes policy protections in decision making on development and land-use change proposals which may affect the distinctive characteristics of the area.	• 11 Areas of Significant Archaeological Interest The • The location of ASAI is available on a spatial dataset (HED Map Viewer)
There is Planning Policy (SPPS) in place to protect Urban Heritage in the event of Development through non-statutory designation of Areas of Townscape Character (ATCs) Local Landscape Policy Areas (LLPAs), and the powers given to Local councils to create 'Local Lists'	• 205 ATCs • 1090 LLPAs • 0 Local Lists
There is a 'Gazetteer of Historic Nucleated Urban Settlements (GHNUS), a record being developed and continually enhanced by HED to help articulate the historic evolution of NI's urban and village settlements to consider Areas of Historic Settlements in the context of development	• 399 Historic Nucleated Settlements available on a spatial dataset (HED Map Viewer)

Fig 33 – Heritage Assets when all shown, cover much of Northern Ireland – HERoNI HED Map Viewer (Crown Copyright)

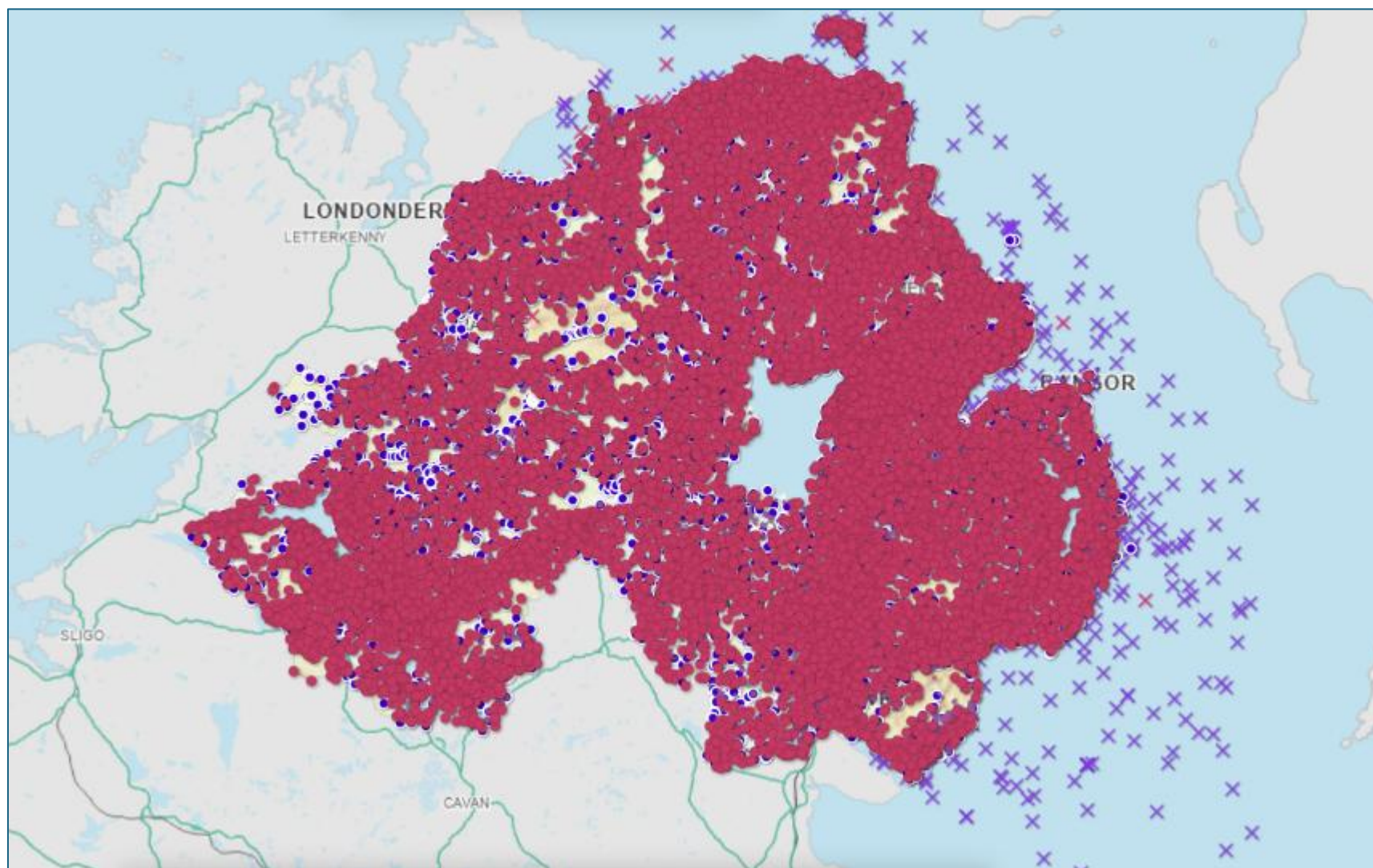


Fig 34 – Extract of map above showing heritage assets in the area around Lough Neagh and Belfast - (as Fig 33 above) – HERoNI HED Map Viewer (Crown Copyright)

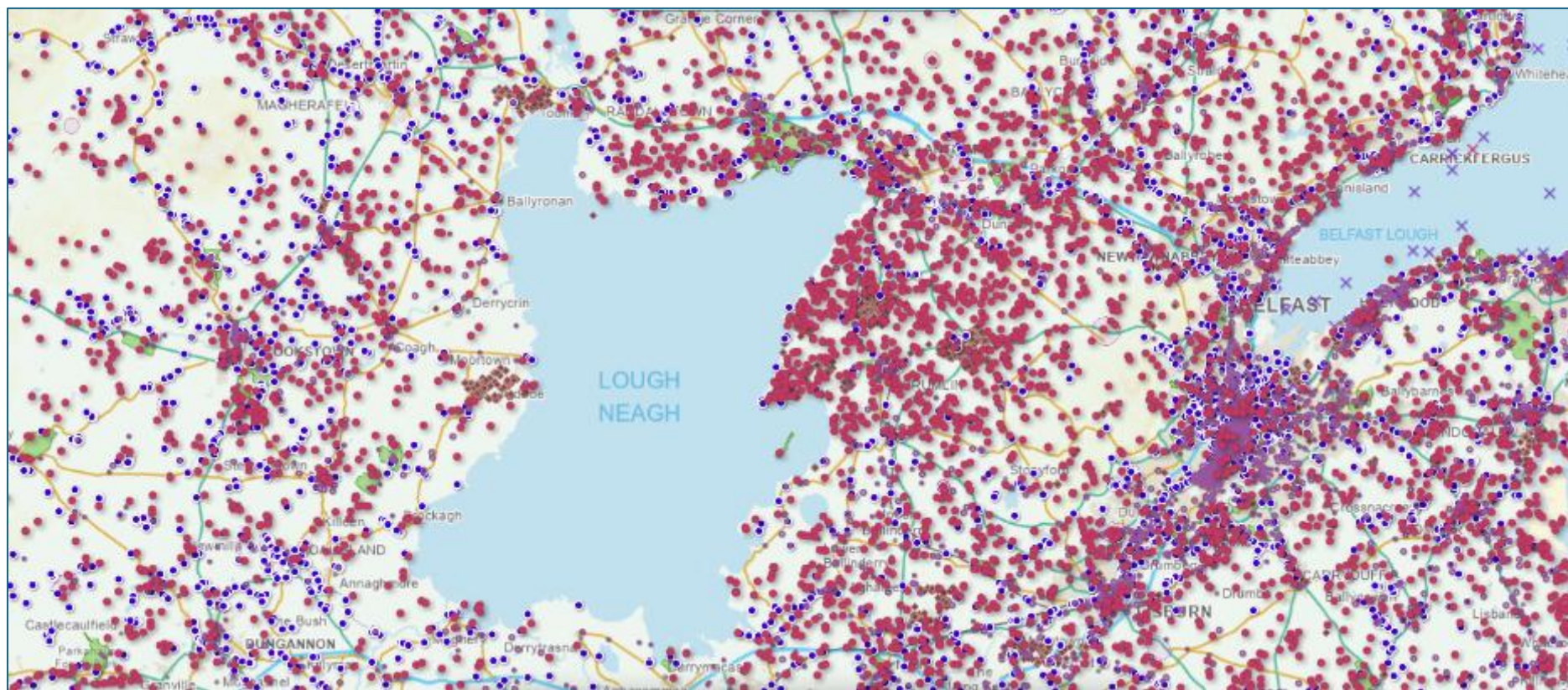


Fig 35 – Location of Libraries in NI (NI Assembly)

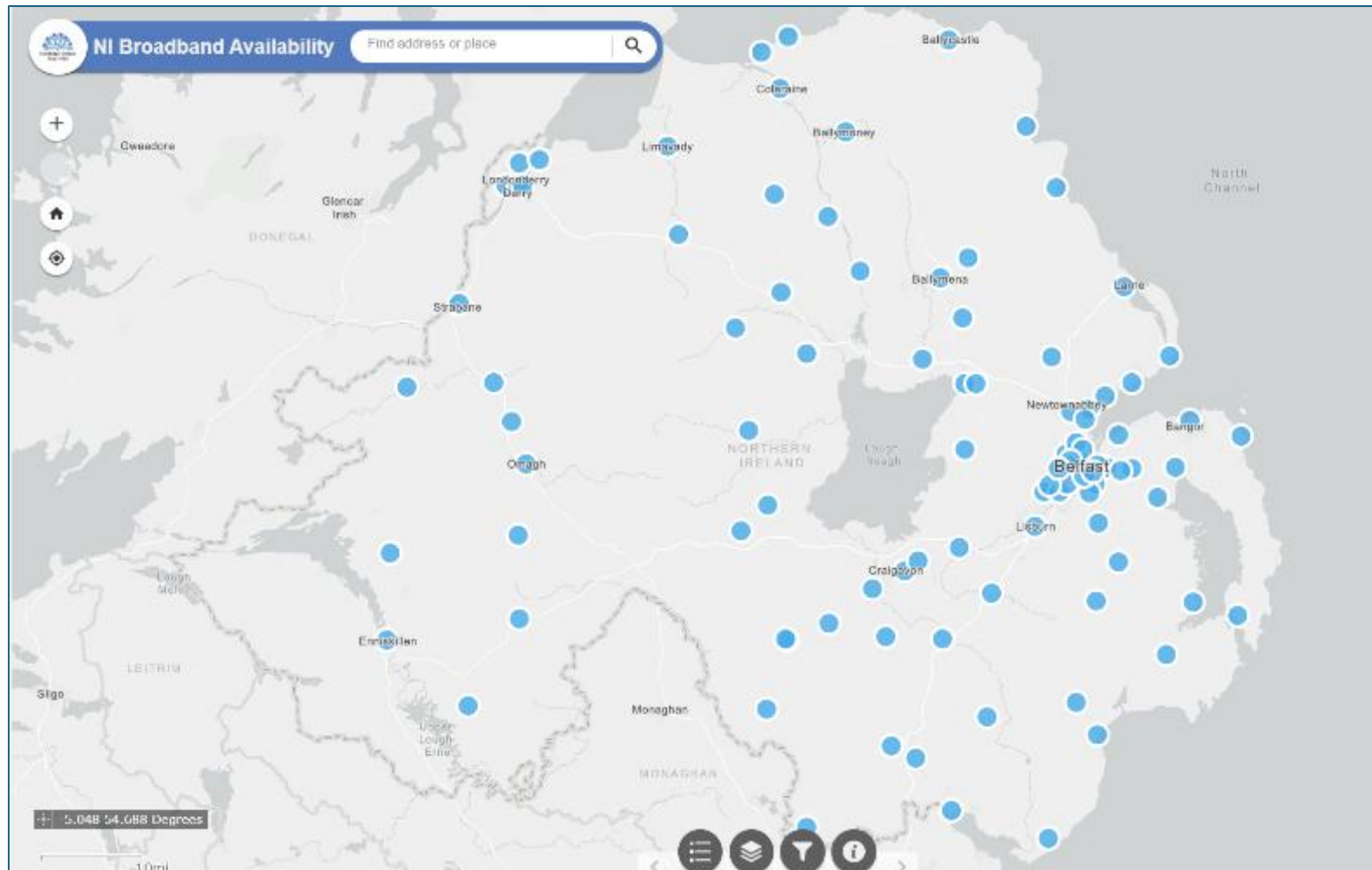
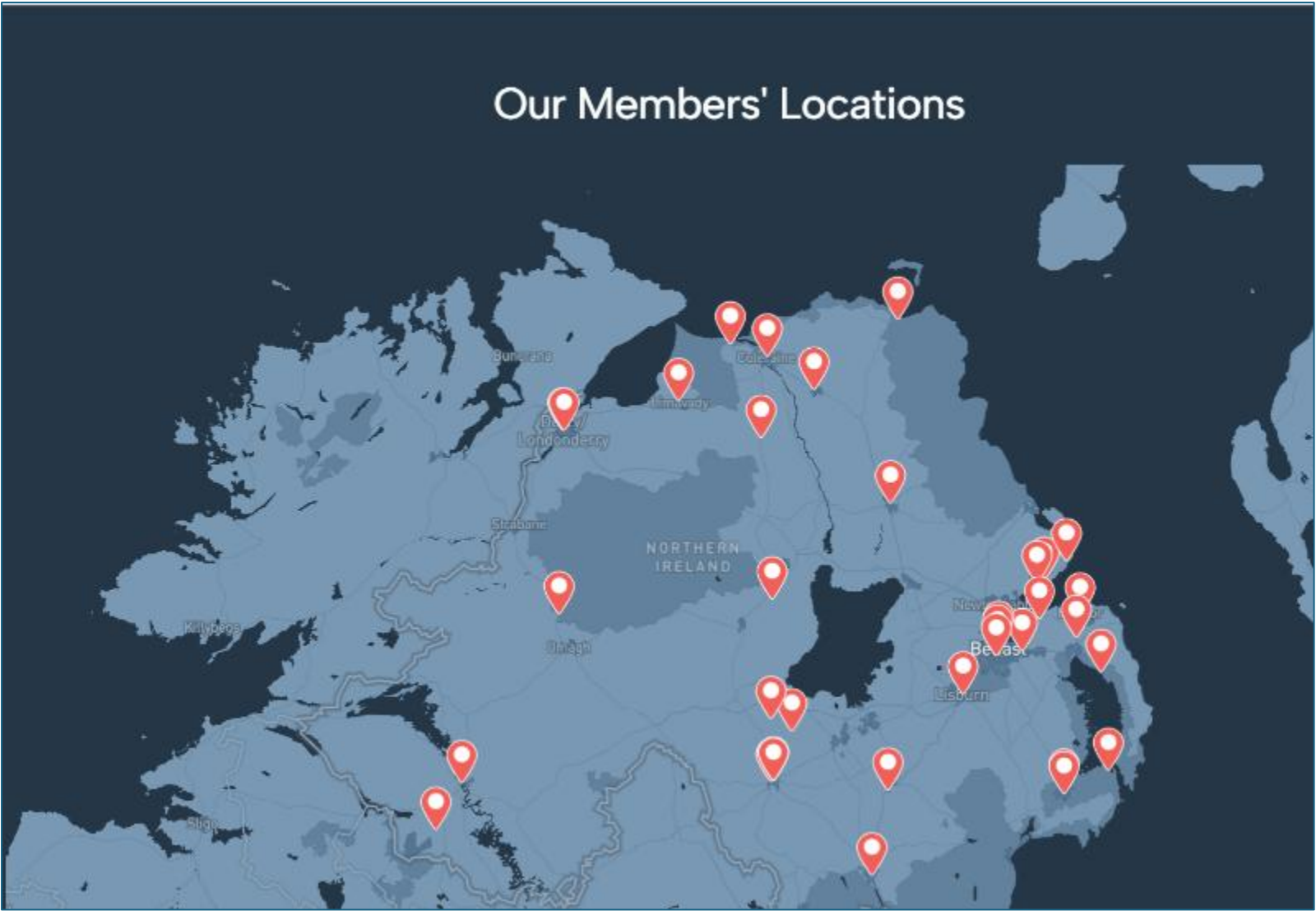


Fig 36 – Location of Accredited Museums in NI (NI Museums Council)



Page 283



8.2.2 Cultural Heritage - Environmental problems (see also individual aims at 9.5.1, 9.5.2, 9.5.3, 9.5.4)

- There are many historic artefacts, archives and information not relating to the built environment within the Public Records Office of Northern Ireland (PRONI) and numerous National and Local Museums and Libraries. Much of this information is of mutual interest – for example in the case of Genealogy, and the association of graveyards, churches and family history. No strategy exists at present to better join up these resources. The HCC Programme²⁶⁸ should address this gap.
- There is much cross over between tangible and intangible heritage including cultural heritage relating to the historic environment. No strategy exists at present to better join up these resources. The HCC Programme²⁶⁹ should address this gap.

Historic Environment

8.2.2 This table below describes environmental problems which relate to the historic environment in Northern Ireland

Environmental Problem	Supporting data (where available at this stage)
There are a number of Conventions, Declarations and Protocols concerning the protection of and right to access and avail of a well-cared for historic environment which have been ratified by the UK (see Table 1 above). Whilst it has met its obligations to protect the historic environment through legislation and development control (RDS) and Planning Policy (SPPS), Northern Ireland Government has underperformed in its ratified obligations in that it has never had an Historic Environment Policy which will set out how the historic environment should be managed to include wider sustainable development and social capital aspects of government policy which may and should be affected by the care of and use of its historic environment.	Conventions, Declarations and Protocols are the commonest form of international agreements to encourage a co-ordinated response to managing the environment, including cultural heritage. Currently the poor conditions in which we currently store some of the archaeological collection of NI – and the extent to which we fail to provide storage or access at all for the majority of this collection – does not meet standards to which the UK Government since 2000 has been committed through the Valetta Convention. By virtue of ratifying this Convention, there is an obligation under international law to comply with its provisions There has never been an Historic Environment Policy in Northern Ireland which sets out how the Historic Environment should be managed.

²⁶⁸ [Heritage, Culture and Creativity \(HCC\) Programme | Department for Communities](#)

²⁶⁹ [Heritage, Culture and Creativity \(HCC\) Programme | Department for Communities](#)

The condition of listed buildings has declined significantly in the last 20 years. Owners of historic monuments face similar challenges to listed buildings owners though the condition of monuments has not worsened at the same rate.

This is due to various factors including:

- ‘The Conservation Deficit’²⁷⁰ – owners of buildings and monuments are aware of the importance of conserving heritage assets but not willing to incur private financial loss; assistance from government is required to encourage private owners to maintain listed buildings and scheduled monuments.
- The perception of practical challenges with heritage projects
- A lack of availability of skilled people in the sector

In the Survey on the Condition of Listed Buildings²⁷¹ carried (2023/24): the overall condition of the majority of buildings appears to have suffered a 24.4 percentage point worsening in 20 years. Monuments have deteriorated at a rate of 20% over the same period.

In the Thatch Survey carried out in 2023 Condition of one quarter of all thatched buildings was poor or very poor: V poor 17%, Poor 8%, Average 22%, Good 30%, v good 23%.

In the listed building owners survey²⁷²²⁷³, over half of respondents (56%) said that it is difficult or very difficult to find skilled builders and 67% of respondents who selected at least one obstacle said that the cost of suitable skilled contractors and/or suitable materials is an obstacle to maintenance. 21% of respondents said that it is difficult or very difficult to find skilled labour.

These results indicate that private market in Northern Ireland may lack suitably skilled conservation workers to undertake works, with a large proportion of listed building owners finding it difficult or very difficult to find skilled builders.

21% of scheduled monument owners survey respondents stated that it is difficult or very difficult to find skilled labour.

In the listed building owners survey²⁷⁴²⁷⁵, when asked for obstacles preventing maintenance, lack of government funding to meet higher maintenance costs was the most cited obstacle, with 77% of respondents who declared at least one obstacle stating it. 75% of respondents said funding/tax breaks would help encourage them to maintain.

²⁷⁰ Due to the higher than average cost of maintaining and repairing heritage assets together with low property values, the cost incurred by owners to care for heritage assets often does not equal the return on that investment. Owners of buildings and monuments are aware of the importance of conserving heritage assets but not willing to incur private financial loss for non-monetary benefits or benefits which are societal and not personal. The term ‘Conservation Deficit’ is used to describe this situation which is directly proportional to property values.

²⁷¹ [Survey on the Condition of Listed Buildings | Department for Communities](#)

²⁷² [Listed Buildings Survey](#)

²⁷³ [Market Failure Analysis of the Heritage Sector in Northern Ireland](#)

²⁷⁴ [Listed Buildings Survey; Scheduled Historic Monuments Survey](#)

²⁷⁵ [Market Failure Analysis of the Heritage Sector in Northern Ireland](#)

	When asked to state obstacles preventing maintenance 19% of respondents held a view that their listed buildings worth does not justify the cost of investing in it. In the scheduled monument owners survey²⁷⁶, when asked about obstacles preventing owners doing more to look after their monument, 40% said that there is no financial benefit, and 34% of respondents said that the effort and cost is not justified. When asked what would assist you in managing or carrying out repairs to your monuments, 70% of respondents said grant funding.
Market failure is partly the result of a ‘Conservation Deficit’ ²⁷⁷ in all but the most affluent parts of NI with no guaranteed funding available to supplement mainstream repair costs and make repair and/or development attractive. There is less money to invest in heritage assets following periods of economic uncertainty, exacerbating this issue.	A study on market failure²⁷⁸ in the heritage sector in Northern Ireland concluded that there is market failure. This study includes four reports: a literature review, survey of listed building owners, survey of scheduled monument owners, and a market failure analysis of the heritage sector in Northern Ireland. Annual Government funding for listed buildings and monuments has reduced from £3-4million between 2011 2015 to £0-320k between 2016 and 2023.
Heritage at Risk in Northern Ireland (HARNI)²⁷⁹ has doubled in the last decade. This encompasses a variety of issues including: • fire/vandalism (unsecure assets) • vacancy leading to poor maintenance and neglect • threat of demolition due to a preference for new build • perception of funding and practical challenges with heritage projects	The current (March 2024) figure of 1,111 is just over double the 527 structures recorded in 2018/19. There are 1366 Central Government Owned Buildings, of which 5.7% are on the Heritage at Risk Register²⁸⁰. Though this figure is not reported as standard, in 2003 a written question in the House of Lords by Lord Laird asked how many properties had been demolished in conservation areas

²⁷⁶ [Scheduled Historic Monuments Survey](#)

²⁷⁷ Due to the higher than average cost of maintaining and repairing heritage assets together with low property values, the cost incurred by owners to care for heritage assets often does not equal the return on that investment. Owners of buildings and monuments are aware of the importance of conserving heritage assets but not willing to incur private financial loss for non-monetary benefits or benefits which are societal and not personal. The term ‘Conservation Deficit’ is used to describe this situation which is directly proportional to property values.

²⁷⁸ [Market Failure Analysis of the Heritage Sector in Northern Ireland](#)

²⁷⁹ The majority of assets on this register are listed buildings. Some unlisted historic buildings of local interest (mainly in Conservation Areas) and some historic monuments are also included. [Heritage at Risk | Department for Communities](#)

²⁸⁰ [The Protocol for the Care of the Government Estate](#)

lack of availability of skilled people in the sector ('dying' trades for example, and small numbers of community Heritage Development Officers/project leaders to bring together users with buildings).	in NI in the last five years and the answer was that 195 had been given permission though no figures were reported on whether all 195 were demolished.²⁸¹ There has been an average of 4 fires recorded in listed buildings each year since 2018.
Whilst designated Heritage assets are also risk due to market failure (see above), undesignated assets are at exacerbated risk of market failure due to lack of regulation.	16,062 Historic buildings worthy of recording are included on the NI Buildings database – this means that circa 7,000 heritage assets were worthy of survey and are recorded but fell short of being of 'special interest'. Since 2015, no councils in NI have used their powers to create 'local lists' of heritage assets as part of the development of Local Development Plans which include a review of Conservation Areas, ATCs and AVCs.
Government is not always seen to be meeting its responsibilities as promised in the Protocol for the Care of the Government Historic Estate²⁸².	Whilst there are 100% of Government Departments have Departmental Heritage Officers, and 100% of Departments have reported on their actions against the 12 points of the Protocol, 5.7% of the Government's Historic Estate is on the HARNI register. Some vacancy is to be expected as functions change, and 5.7% is about half the 12% rate for all Listed Buildings, but when Government has set out to 'lead by example' it could still be lower. Local Councils do not report on the Protocol for the Care of the Government Estate. Although recommended to Councils by the NI Executive in 2011, none have fully adopted the reporting mechanism of the Protocol; some councils have agreed to abide by its principles within Heritage plans.
Heritage assets are at risk because they remain undiscovered. This is because surveying for designation has largely been paused, with leaving potentially significant heritage assets at risk from development/demolition.	A second, area-based survey of all historic buildings (the Second Survey) has been underway at varying capacity since 1997. As of 2025, 70% of NI has been second surveyed, but 30% has remained unsurveyed due to under resourcing. There has been a modest increase of 11% in the number of buildings

²⁸¹ [Northern Ireland: Conservation Areas and Demolitions: 18 Dec 2003: Hansard Written Answers - TheyWorkForYou](#)

²⁸² [The Protocol for the Care of the Government Estate](#)

	listed in recent years, with a total of 9,124 statutory listings in 2023/24, compared with 8,191 in 2003/04. At this rate it is estimated that to complete the survey will take 65 years. This leaves buildings worthy of protection at risk. As older buildings become rarer and our understanding of heritage evolves, (such as the significance of vernacular heritage), this delay has left potentially ‘listable’ buildings vulnerable to demolition or alteration. This situation further exacerbates the perception that designation stands in the way of progress, as buildings are often brought forward for consideration at the point where they are about to be developed. This situation further exacerbates the perception that designation stands in the way of progress, as buildings are often brought forward for consideration at the point where they are about to be developed.
Local Councils are under-resourced with reference to the historic environment, and the management of heritage assets which are not designated but are valuable to places.	16,062 Historic buildings worthy of recording are included on the NI Buildings database – this means that circa 7,000 heritage assets were worthy of survey and are recorded but fell short of being of ‘special interest’. Although councils have powers to create ‘local listings’ no council has availed of these powers. Around a third (4 out of 11) of district councils in Northern Ireland employ temporary or permanent dedicated Heritage Development Officers. This compares to for example 100% in County Councils in the Republic of Ireland.
Northern Ireland is at Risk from climate change impacts.	The Climate Change Act (Northern Ireland) 2022²⁸³ (Act) sets a target of an at least 100% reduction in net zero greenhouse gas (GHG) emissions by 2050. Currently, evidence is available to demonstrate that re-use compares favourably to demolition and re-build. There is an opportunity to re-use heritage assets in order to mitigate against the impact of carbon expenditure in construction, alleviating Northern Ireland’s contribution to climate change.

²⁸³ [Climate Change Act \(Northern Ireland\) 2022](#)

	The Draft Circular Economy Strategy says that ‘<i>More re-using of building materials and components, a greater focus on renovation and retrofitting rather than new-build can produce a 7.7% decrease in material footprint.</i>’²⁸⁴ Data on this opportunity en masse is not available specific to NI, however data does exist (Historic England²⁸⁵) to put re-use in front of demolition and new build when considering development. In the Listed Building Owners’ Survey ‘²⁸⁶<i>The third key barrier to maintenance of listed buildings identified in the survey was insufficient knowledge and advice (26% respondents).</i>’²⁸⁷ Poorly maintained buildings are at a much greater risk from climate change impacts (UAH).
Heritage assets may be at risk from coastal, fluvial and pluvial flooding and erosion related to a changing climate, changing land use and agricultural practices. The full picture is not yet visible or understood in NI.	No figures available – work is underway through the HED digital transformation to access statistics on climate change impacts to historic monuments, and the potential to use monuments in agricultural landscapes as biodiversity areas by Department for Communities Historic Environment Division (HED) HED and others partnered with the National Trust to pilot a Climate Change Hazard Mapping Tool, however no date has been collated yet. In the Listed Building Condition Survey²⁸⁸, condition was cross references with areas of high climate change risk (flooding etc). No correlation was noted, however this may be a long term trend, and therefore this outcome remains inconclusive. We are aware of the impacts on historic masonry structures; bridges embankments etc, and recent high profile losses and work to stabilise retaining walls following persistent flooding.

²⁸⁴ [Circular Economy Strategy for Northern Ireland | Department for the Economy](#)

²⁸⁵ [Monitoring and Measuring the Built Historic Environment’s Pathway to Net Zero | Heritage Counts | Historic England](#)

²⁸⁶ [Listed Buildings Survey](#)

²⁸⁷ [Listed Buildings Survey](#)

²⁸⁸ [Listed Buildings Survey](#)

Further risks to heritage assets are due to maladaptation (for example due to incorrect specification for retrofit causing material harm.)	No data on the extent of the retrofit issue has been extracted for Northern Ireland, however this has been reported by Historic England, Historic Scotland the Sustainable Traditional Buildings Alliance and IHBC. ²⁸⁹
Risks to heritage assets due to maladaptation include Peatland restoration works which carry the risk of inadvertent harm to both designated and undesignated heritage assets, including those not yet identified.	Evidence from individual case studies highlights failure to consider heritage assets in peatland restoration can result in damage to archaeological remains. This risk has also been acknowledged through anecdotal reporting by agencies including Historic England, Historic Scotland, and Bord na Móna.
Contribution of the historic environment to biodiversity is not yet fully understood.	Currently, spatial mapping exists which could provide a picture of the contribution of protected areas such as scheduled monument zones within for example farmland or Historic Parks and Gardens to biodiversity. This information cannot yet be collated.
The Historic environment is not meeting its potential to support the economic, cultural and environmental needs specific to people in Northern Ireland because this potential is not fully understood.	Data on how the historic environment can meet social, economic, cultural and environmental needs has been recorded in other jurisdictions in the UK and in the ROI but though statistical information and case studies have been collated in the past²⁹⁰, no such recent data exists for NI to allow a comparable calculation. The ‘Market Failure’²⁹¹ seen across NI is not as widespread elsewhere in the UK - existing but less densely and in a different context. NI is unique in its need and how the historic environment can meet its unique needs. Data on how heritage delivers does exist²⁹², however it does not exist sufficiently to fully measure impacts, nor do the necessary statistics exist to monitor its progress in delivering it in Northern Ireland.

²⁸⁹ [When Retrofit Goes Wrong | Heritage Counts | Historic England](#)

²⁹⁰ [Heritage Delivers | Treasure the Past, Enrich the Future](#)

²⁹¹ [Market Failure Analysis of the Heritage Sector in Northern Ireland](#)

²⁹² [Heritage Delivers | Treasure the Past, Enrich the Future](#)

	Historic Buildings contribute to a low-carbon, circular economy²⁹³, however no NI specific data is available to understand this potential. Heritage places are one of the biggest draws to Northern Ireland for Tourists. No studies have yet been carried out to demonstrate how investing in maintaining heritage could result in higher numbers of visitors. In the nations Brand Index 2025, Northern Ireland's top two Attributes were 'Natural Beauty' (20th out of 50) and 'Environment' (21st). Since 2016, all 23 Attribute scores for Northern Ireland have shown improvement. The most notable increases were in respondents' willingness to 'work and live' in Northern Ireland (+0.35) and perceptions of Northern Ireland as being 'rich in historic buildings' (+0.29). In terms of ranking, 'historic buildings' (along with 'natural beauty') achieved the largest improvement, each rising three places.²⁹⁴
The non-monetary opportunities and benefits of owning, caring for, living amongst and using heritage assets are not fully understood in a Northern Ireland context i.e. its positive impacts on social value, quality of life, health, education, identity and pride in place.	Data on how the historic environment contributes to health and well-being has been recorded in other jurisdictions in the UK and in the ROI, but though case studies exist, a comparable calculation of the benefits of the historic environment in real terms to NI's health, wellbeing and quality of life does not yet exist. Similarly to above, there is a lack of wellbeing, quality of life and social value research directly relating to the historic environment and there are currently no directly measurable metrics to monitor change/ impact which are specific to NI's circumstances and unique historic environment. However, NISRA's Continuous Household survey reported that: visiting a heritage site had statistically greater life satisfaction than those who did not (7.9 versus 7.6) There are no figures available on the number of heritage volunteers in Northern Ireland. Some figures are available to report on the number of 'openers' each year in the annual European Heritage Open Days events in NI, however overall NI figures are not collated currently, and don't reflect the large number of heritage activities and events which take place each year across a diverse range of organisations – both public and private.

²⁹³ [Heritage in a Circular Economy | Heritage Counts | Historic England](#)

²⁹⁴ [Nation Brands Index | The Executive Office](#)

The unique potential for Northern Ireland’s historic environment to be used as a tool for peace community cohesion, and good relations has not been fully explored.	The relationship between the historic environment and social capital was demonstrated in a recent study by Mak et al (2023), which found that people living in places with greater historic built environment experience higher levels of personal relationships, social network support, and civic engagement (1).²⁹⁵ This is of particular resonance for a post-conflict society such as Northern Ireland, where communities can together explore shared heritage, contributing to increased respect and community cohesion. We will encourage people to create shared, inclusive narratives, emphasising our common heritage and highlighting elements of local history that are shared by all communities, such as natural beauty, cultural diversity and collective achievements.
Heritage assets are not equally accessed across age and socio-economic scales. The historic environment is not visited equally across society in NI which is exacerbated by the view that heritage is ‘elitist’ and ‘difficult’. This issue is accelerating due to a further legacy of neglect / lack of maintenance undermining the value of heritage buildings among society (see condition above).	In (NISRA)’s annual Continuous Household Survey 2024-25²⁹⁶ adults with a disability were found to be less likely to have visited a place of historic interest than those without a disability (56% and 67% respectively). Analysis by deprivation level showed that adults living in the least deprived areas were more likely to have visited a place of historic interest than adults (77% and 51% respectively) and children (73% and 63% respectively)²⁹⁷. In 2024/25 a higher proportion of adults from the Protestant community had visited a place of historic interest within the previous year (70%) than those from the Catholic community (57%).²⁹⁸
There is a general misunderstanding of regulation. Statutory consultation is perceived as prohibitive, and that ‘additional red tape’ causes delays in development. and	The AREA Report (Adaptive Re-use of Existing Assets²⁹⁹) by the Strategic Investment Board (SIB) concluded by criticising ‘heritage authorities’ and suggesting reform as a way forward for adaptive re-use of heritage buildings.

²⁹⁵ [The Role of Heritage in Bringing People Together | Heritage Counts | Historic England](#)

²⁹⁶ [Experience of culture, arts and heritage by adults in Northern Ireland](#)

²⁹⁷ [Engagement in culture, arts, heritage and sport by young people in Northern Ireland 2022 | Department for Communities](#)

²⁹⁸ *‘using cultural assets to bring people together for therapeutic or social purpose’*

The ‘Together: Building a United Community’ (T:BUC) Strategy, reflects the NI Executive’s commitment to improving community relations in Northern Ireland and continuing the journey towards a more united and shared society. The strategy outlines how government, community and individuals will work together to build a united community via a range of initiatives.

²⁹⁹ [AREA-Report-2024.pdf](#)

there is a misperception that listed building consent and archaeological planning and licensing consents contribute to this delay. Due to a reduction in surveying for designation, discovery of assets can be at the point of application for permissions for removal or modification – leading to delays and exacerbating this perception.

Enforcement of heritage legislation and planning policy in NI are under resourced and not always carried through – this creates a ‘piecemeal’ view of regulation, further exacerbating the issue.

8.3 Part 3 – Cultural Heritage – HE Policy Impact

SEA topic	SEA Objective
Cultural Heritage	• preserve historic buildings, archaeological sites and other culturally important features • create spaces and buildings that work well, wear well and look well • value and protect diversity and local distinctiveness

- Implementation of HE Policy is unlikely to have significant negative effects on Northern Ireland’s cultural heritage.
 - An **Historic Environment policy is needed to provide high level leadership** on the Northern Ireland Government’s attitude to the historic environment which will impact policy, plans and strategies across all parts of Government, including the Programme for Government.
 - HE Policy can demonstrate that the historic environment is connected to other relevant priorities like:
 - **Regeneration**
 - **Housing**
 - **Health and well being**
 - **Sustainability-led development and employment**
 - **Tourism and Economic Growth**
- and
- **Good places** that people can be proud of, places that help people to thrive - leading to better health, better life chances and stronger communities.
 - Future consideration may also be given to amending Northern Ireland Heritage Legislation, to ensure that it is fit for purpose.

- The Culture, Arts and Heritage Taskforce Report³⁰⁰ in 2023 described a ‘*continuing funding crisis..*’ with ‘*organisations and practitioners “doing more with less”*’. HE Policy can highlight the **need for and direct investment in the historic environment** outside its own ‘sector’; HE Policy can set in place policy which aspires to conserve, enhance and promote Northern Ireland’s historic environment, and can impact other strategies, plans and programmes as a material consideration – protecting, conserving, maintaining and enhancing spaces and buildings as well as landscapes
- HE Policy can have significantly positive effects on all aspects of the environment, stemming from the historic environment which is intrinsically linked to a large proportion of Northern Ireland’s cultural heritage in the form of the Arts, Creative Industries, Traditional Heritage like music, food and crafts, Museums, Archives and Libraries; cultural heritage reaches beyond tangible assets to intangible heritage – HE Policy aspires to engage and enthuse new audiences, **reinforce cultural identity and connect people with all aspects of cultural heritage** – benefitting people
- HE Policy can help to highlight and arrest the decline in condition of the historic environment. As reported by Historic England³⁰¹, research demonstrates that **preventative maintenance strategies result in economic savings** as expensive and unnecessary repairs are prevented. Delaying repairs to historic buildings could increase the costs of repairs by 15% to 20%. Furthermore, it causes cumulative consequential damage, where one problem leads to another issue elsewhere in the building fabric. There is therefore an accelerating issue because of unavailability of funding in Northern Ireland to support owners to maintain historic buildings and monuments, exacerbated by ‘market failure’ of the historic environment. HE Policy can **demonstrate the investment potential in preventative maintenance** as well as the potential to **leverage investment from other sectors and build community wealth – contributing to preservation and regeneration**.
- Listed Building and Monuments Owners Survey results seem to support that most respondents are aware of the importance of heritage assets but not willing to incur private financial loss, with assistance from government required to encourage private owners to maintain listed buildings and scheduled monuments. HE Policy could make the case for investment in the **historic environment as a public good**.
- HE Policy can make the case for the **economic value of the historic environment including the ‘heritage premium’**, marketing and tourism
- HE Policy can highlight the **opportunity to re-use and retrofit heritage assets to contribute to mitigation against climate change impacts**.

³⁰⁰ [Investing in Creative Delivery – A report from the Culture, Arts & Heritage Strategy Taskforce | Department for Communities](#)

³⁰¹ [The Role of Maintenance and Repair in a Low Carbon Future | Heritage Counts | Historic England](#)

8.3.1 Potential Negative Effects and Mitigation

As highlighted previously, the avoidance of damage to all heritage assets – whether designated or not - is highly desirable owing to their finite nature as a resource. Compensation measures (offsetting) are not usually appropriate, as heritage assets can't be re-created. Alternative proposals that avoid or result in less harm to the historic environment should be considered preferentially before considering whether mitigation is appropriate.

Mitigation measures for the implementation stage of a planning application are the most appropriate method of dealing with situations where damage can't be avoided.

Consideration can also be given to mitigation measures that enhance the historic environment.

Examples of possible mitigation measures for potential harm to the historic environment might include:

- Strengthened references to the historic environment in policy framework, criteria and guidance e.g. addition of a specific historic environment policy, regeneration policies, planning obligations;
- Preparation of detailed historic environment policy guidance or design guide;
- Heritage conservation requirements including positive measures to promote the conservation and enjoyment of heritage assets within site specific development policies
- Undertaking of detailed historic characterisation studies to inform development;
- Environmental Impact Assessments – particularly supporting technical appendices that focus on archaeological interpretation
- Use of Article 4 Directions to protect the character of conservation areas;
- Specific conditions included within Development Consent Orders or other regulatory consent Preparation of management plans for heritage assets
- Potential dedicated Heritage Officer within all Councils and Local listings within Council Areas to conserve, protect and enhance heritage assets and undesignated heritage assets
- Completion of feasibility studies to help facilitate the sustainable use of a heritage asset.
- Promoting and supporting maintenance above all; exploring and evidence to support funding spent on maintenance as an investment rather than a cost; making this accessible and mainstreamed without additional levels of controls and frameworks.

8.3.2 Likely impact without HE Policy

- Without HE Policy, the condition of the historic environment is likely to continue to decline – resulting in the permanent loss of a unique, finite resource.
- Without HE Policy, other sectors, people and parts of the environment might miss out on using heritage assets as a resource for wider benefits: regeneration, housing, culture and tourism, employment and good health.
- Without HE Policy opportunity to re-use and retrofit heritage assets to contribute to mitigation against climate change impacts may be missed

8.4 Cumulative, Synergistic or Secondary Effects - the backbone of HE Policy

Draft HE Policy is organised under three Sustainable Development Goals identified by the Culture, Arts and Heritage taskforce³⁰² - to **strengthen, connect** and **innovate** for the heritage sector.

These Sustainable Development Goals are not independent, they are interdependent. The same may be said of the interdependency between the historic environment and the natural environment, the urban environment, intangible cultural heritage, climate change impacts or society. Strengthening one may provide benefits for the other, and so on. But any negative impacts may also have unintended consequences. of this impact is reflected in this Environmental Assessment and throughout HE Policy.

Cumulative, secondary or synergistic impacts on heritage assets and places occur in different ways:

- **Cumulative** – where individually minor impacts can accumulate to have significant effects
- **Synergistic** – where separate minor impacts interact to produce a total effect greater than the sum of the individual effects
- **Secondary or indirect** – where effects are not a direct result of the plan but occur away from the original effect as a result of its impact(s).

³⁰² [Heritage, Culture and Creativity \(HCC\) Programme | Department for Communities](#)

Potential negative effects have been identified and proposals to mitigate against those effects have been proposed. But in fact, this interdependency is an opportunity – HE Policy which has partnership at its core and looks for mutually beneficial outcomes has the potential for a greater reach – not ‘heritage for heritage’s sake’ but heritage for people, communities, places, planet and peace. Demonstrated by the following table, this combined effect is the basis for the final HE Policy aims. These recognise the historic environment as being one part of a greater whole – which includes both built and natural environments.



8.4.1 HE Policy - Inter-relationships

The table below attempts to visualise the inter-relationship and impacts on aspects of the environment which should result from Sustainable Development Goals and HE Policy.

Key:  does affect **++** highly positive **+** positive **+ -** positive and negative

	Material Assets	Landscape	Population and Health	Climatic Factors	Biodiversity, Flora and Fauna	Soil, Air and Water	Cultural Heritage
Strengthening: 'Our Goal - A well cared for historic environment where best practice is universal.'	 ++	 ++	 ++	 +	 +	 +	 ++
Connecting: 'Our Goal - Thriving places - where the unique value of heritage is understood and enjoyed.'	 ++	 ++	 ++	 + -	 + -	 + -	 ++
Innovating: 'Our Goal - A flourishing historic environment sector which is protected, sustained, accessed, and used to its full potential.'	 ++	 ++	 ++	 ++	 +	 +	 ++

The table below highlights the key interrelationships identified in this SEA. In fact, there is an interrelationship across all aspects of the environment describe under the SEA topics to each other. Key interrelationships for HE Policy are between cultural heritage and material assets, landscape, and population and human health. There may also be ‘intangible’ interactions between factors; for instance, many sites of biodiversity value may also comprise sites of heritage significance.

Material Assets							
Landscape	✓						
Population and Health	✓	✓					
Climatic Factors	✓	✓	✓				
Biodiversity, Flora and Fauna	✓	✓	✓	✓			
Soil, Air and Water	✓	✓	✓	✓	✓		
Cultural Heritage	✓	✓	✓	✓	✓	✓	
	Material Assets	Landscape	Population and Health	Climatic Factors	Biodiversity, Flora and Fauna	Soil, Air and Water	Cultural Heritage

8.5 Part 3 - Suggested HE Policy Aims – Cultural Heritage

The HE Policy aims which follow describe policy to support partnerships – and the cumulative, synergistic and secondary effects that partnering with other policy areas and activity can have which will benefit the historic environment, but also people, places, the planet and peace. The Baseline and Environmental problems relating to these specific areas which may not spring from aspects of the environment/SEA Topics are listed with each aim.

8.5.1 Policy Aim 13: Using heritage assets to contribute to Programme for Government including the Wellbeing Framework: Stronger Economy, Better Homes, Healthier Lives and Brighter Futures

Existing Baseline:

- 100% of Government Departments have Departmental Heritage Officers
- 100% of Departments have reported on their actions against the 12 points of the Protocol In their Protocol for the most recent returns in 2023;
- Departments reported that Central Government currently owns 1366 heritage assets, including:
 - 657 listed buildings and
 - 537 Monuments (including State Care Monuments)
 - a further 135 undesignated historic buildings.
- 9 of 12 Government Departments had at least one building on HARNI (2023)
- Local councils own a large number of heritage assets too, but these are not currently recorded or reported on.
- Councils fund communities to repair and look after buildings in conservation areas – there are 60 Conservation Areas in Northern Ireland.
- Many local councils fund heritage activity which complements physical assets – tours, conservation volunteering, traditional cultural activities like music, storytelling, crafts or bread-making for example.
- Most local councils also own and manage museums which hold complimentary artefacts and archives to HERoNI
- Local museums containing local collections are sometimes counted into statistics if they are accredited (38 as March 2024³⁰³).
- There is ongoing and future scope for ‘unseen’ investment in heritage by government. For example, though not the headline, investment in heritage is happening through City and Growth Deals at Carrickefergus Castle, Belfast City and Derry and Strabane City and Growth Deals, and in less obvious ways which can be shown as creating impact through the PfG’s Wellbeing Framework.

³⁰³ Museums Council

Environmental Problems:

- We know that Government is not always seen to be meeting its responsibilities as promised in the Protocol for the Care of the Government Historic Estate³⁰⁴. 5.7% of the Government's Historic Estate is on the HARNI register. Some vacancy is to be expected as functions change, and 5.7% is about half the 12% rate for all Listed Buildings, but when Government has set out to 'lead by example' it could still be lower. This means that they are probably vacant, likely to be no longer in use, and at risk of being poorly maintained.
- Though it exists on other parts of the UK, targeted research on how historic places and heritage activity can contribute to government targets like those for better health, wellbeing, community cohesion, good relations and education does not exist and is therefore not understood for Northern Ireland, which has a unique set of circumstances. This absence of understanding - both wider problems associated with decline and positive opportunities missed to use heritage - is notable in the absence of any reference to heritage in the PfG, despite the large number of assets in NI.
- Local Councils do not report on the Protocol for the Care of the Government Estate. Although recommended to Councils by the NI Executive in 2011, none have fully adopted the reporting mechanism of the Protocol; some councils have agreed to abide by its principles within Heritage plans. Less than a third of local councils in NI have dedicated heritage officers.
- In the past projects which for example compare heritage vacancy to housing need are not 'joined up'. This process has begun in other areas of the UK and in the Republic of Ireland – the opportunity exists in NI.

Alternatives:	• 'Do Nothing' - this option would mean heritage would continue to be marginalised. Currently policy on heritage has been somewhat sidelined, seen as a 'nice to have'. With its steady decline, apathy has set in. This is reflected not just in squeezed budgets but in the separateness of heritage from central capital investment, an 'add on', acquiring a 'niceness', thinking 'it will always be there'. This needs to change to keep heritage assets relevant and requires Policy to direct it.
Selection:	Using heritage assets to contribute to Programme for Government including the Wellbeing Framework: Stronger Economy, Better Homes, Healthier Lives and Brighter Futures • This is an important cornerstone of HE Policy. This aim encourages and stimulates collaboration across government to maximise the potential synergies between heritage and wider government targets – benefitting both. • The Northern Ireland Programme for Government (PfG)³⁰⁵, is focused upon '<i>doing what matters most today</i>'. It sets out nine priorities with the '<i>goal of improving the wellbeing of everyone living and working here</i>' and striving '<i>to make sure that everyone has the best possible opportunity</i>.' Heritage has potential to become an important tool in '<i>..making this</i>

³⁰⁴ [The Protocol for the Care of the Government Estate](#)

³⁰⁵ [Programme for Government 2024-2027 'Our Plan: Doing What Matters Most' - Documents | The Northern Ireland Executive](#)

	<i>a more vibrant and inclusive place to live, work, invest and visit..’ or ‘...innovative approaches to a new housing supply..’, or ‘...creating a fair and inclusive society where everyone flourishes, no one is left behind, and everyone is made to feel welcome..’.</i> These are all benefits³⁰⁶ to be gained from a cared for and accessible historic environment. They will need strong partnerships and collaboration if this potential is to be fully realised. • Use of heritage assets has strong potential to contribute to Programme for Government outcomes including the Wellbeing Framework: Stronger Economy, Better Homes, Healthier Lives and Brighter Futures. • Existing vacant buildings are ‘stranded assets’ amid existing communities. Usually already supported by existing infrastructure, there are many success stories to draw upon - re-using former government institutions for culture or community use, educating children through access to state care monuments, caring for protected historic monuments on farmland which are an important repository of biodiversity and of carbon capture on peatland, or looking after quality places like coasts, harbours, parks and gardens are examples of how heritage can and does contribute towards government wide objectives like the need to be healthy, provide employment opportunities and support the tourism economy. • Showing leadership by investing in and showcasing examples for care and use/re-use of heritage throughout government creates opportunity to bring heritage buildings back into the mainstream, bring cultural heritage into decision-making as a pillar of sustainable development, creating employment and safeguarding good places which have wider benefits for people now and in the future. • HE Policy will be a guide for the leading of government through the Protocol for the Government Estate, having a positive effect for the historic environment and therefore people and places. • Financial mechanisms (e.g. grants, tax reliefs, green finance) could create partnerships between parts of government to incentivize climate-resilient heritage management, and re-use/adaptation to mitigate against carbon expenditure. • HE Policy can emphasise interdepartmental and cross-sectoral collaboration, especially with planning, infrastructure, and agriculture, to embed heritage in broader social, economic and climate action.
Potential for Monitoring: HEADLINE METRICS	SAFER COMMUNITIES/BETTER HOMES • New Stat - Number of Community Asset Transfers that are Heritage Buildings New Stat - Percentage of new social housing units delivered in existing buildings • New Stat - Number of Heritage at Risk Sites in High Streets • No of heritage assets in the government historic estate (Protocol for the Care of the Government’s Historic Estate).
Potential for Monitoring:	• No of listed buildings in the government historic estate.

³⁰⁶ [CULTURE AND HERITAGE CAPITAL: MONETISING THE IMPACT OF CULTURE AND HERITAGE ON HEALTH AND WELLBEING](#)

SUPPORTING METRICS	• no of scheduled monuments in the government historic estate as provided by departments • no of monuments on the sites and monuments register in the gov estate as provided by departments • No of unlisted buildings of historic importance in the government historic estate. • No of pre 1919 homes in Northern Ireland (NIHE NI house condition survey) • No of Industrial heritage and historic parks and gardens • No of defence heritage sites in the government historic estate. • Local councils own a large number of heritage assets too, but these are not currently recorded or reported on.		
Effects on SEA Objectives:	Material Assets	++	Government-led reuse strengthens long-term care and reintegrates heritage assets into communities.
	Landscape	++	Maximising the potential synergies between heritage and wider government targets protects landscape character and scenic value.
	Population / Health	++	Alignment with wider government actions improves wellbeing and life opportunities.
	Climatic Factors	+	Conservation and reuse support net-zero by avoiding demolition and reducing carbon
	Biodiversity, Flora, Fauna	+	Conservation aligns with habitat and green-space protection
	Air, Water and Soil	?	More visitors may increase travel-related impacts, though these can be managed through planning controls (e.g. SPPS).
	Cultural Heritage	++	Embedding heritage in government outcomes elevates its role in sustainable development.

8.5.2 Policy Aim 14: Collaborating with others to magnify an evidence base for the catalytic effect of heritage investment

- **Existing Baseline:** The DfC Historic environment website reports that: ‘Significant funds are invested in the historic environment every year in Northern Ireland³⁰⁷. This sustains jobs, skills and knowledge.

In 2012 research³⁰⁸ was published in this area which established that:

- NI historic environment generated circa £532 million of output per annum, created/sustained a total of circa 10,000 FTE jobs and generated circa £250million of Gross Value Add each year
- in NI, the historic environment accounted for three jobs per thousand of the population compared to 8.1 in the Republic of Ireland and 11.8 in Scotland
- if the NI sector could perform at an equivalent rate to Scotland, it could generate £1.5 billion annually and support 20,000 jobs i.e. three times its 2012 output and twice as many jobs

Economic impact from heritage is not just a result of tourism. It also helps to deliver places where people want to live and businesses want to locate; it can provide an environment that helps to nurture business growth and attract new business and create jobs. However, further statistics easily available on tourism are published on page 39 of the document ‘NI Heritage Statistics as recorded on 31 March 2019³⁰⁹’ which help to illustrate that some of the potential indicated in 2012 has been realised in the intervening period.’

- In the listed building owners survey³¹⁰, when asked for obstacles preventing maintenance, lack of government funding to meet higher maintenance costs was the most cited obstacle, with 77% of respondents who declared at least one obstacle stating it. 75% of respondents said funding/tax breaks would help encourage them to maintain.
- When asked to state obstacles preventing maintenance 19% of respondents held a view that their listed buildings worth does not justify the cost of investing in it.

³⁰⁷ [The value of the Historic Environment | Department for Communities](#)

³⁰⁸ [Study of the economic value of Northern Ireland's historic environment | Department for Communities](#)

³⁰⁹ [NI Heritage Statistics as recorded on 31 March 2019](#)

³¹⁰ [Listed Buildings Survey; Scheduled Historic Monuments Survey](#)

³¹¹ [Market Failure Analysis of the Heritage Sector in Northern Ireland](#)

- In the scheduled monument owners survey³¹², when asked about obstacles preventing owners doing more to look after their monument, 40% said that there is no financial benefit, and 34% of respondents said that the effort and cost is not justified. When asked what would assist you in managing or carrying out repairs to your monuments, 70% of respondents said grant funding.
- Data on how the historic environment can meet social, economic, cultural and environmental needs has been recorded in other jurisdictions in the UK and in the ROI but though statistical information and case studies have been collated in the past³¹³, no such recent data exists for NI to allow a comparable calculation.
- The ‘Market Failure’³¹⁴ seen across NI is not as widespread elsewhere in the UK - existing but less densely and in a different context. NI is unique in its need and how the historic environment can meet its unique needs. Data on how heritage delivers does exist³¹⁵, however it does not exist sufficiently to fully measure impacts, nor do the necessary statistics exist to monitor its progress in delivering it in Northern Ireland.
- Historic Buildings contribute to a low-carbon, circular economy³¹⁶, however no NI specific data is available to understand this potential.
- Heritage places are one of the biggest draws to Northern Ireland for Tourists. No studies have yet been carried out to demonstrate how investing in maintaining heritage could result in higher numbers of visitors. In the nations Brand Index 2025, Northern Ireland’s top two Attributes were ‘Natural Beauty’ (20th out of 50) and ‘Environment’ (21st). Since 2016, all 23 Attribute scores for Northern Ireland have shown improvement. The most notable increases were in respondents’ willingness to ‘work and live’ in Northern Ireland (+0.35) and perceptions of Northern Ireland as being ‘rich in historic buildings’ (+0.29). In terms of ranking, ‘historic buildings’ (along with ‘natural beauty’) achieved the largest improvement, each rising three places.³¹⁷
- The UK ‘Monetising the Impact of Culture and Heritage on Wellbeing’³¹⁸ study concludes that the general health benefits associated with culture and heritage engagement in adults aged 30-49 alone equated to £8.08bn.

Environmental Problems:

- Standard Industrial Classification (SIC) and the Standard Occupational Classification (SOC) codes, used to give an indication of emerging trends and the strength of the UK economy do not recognise the heritage sector in all its genres/activities, therefore it is largely invisible.
- The Historic environment is not meeting its potential to support the economic, cultural and environmental needs specific to people in Northern Ireland because this potential is not fully understood in the context of NI ‘s unique circumstances.

³¹² [Scheduled Historic Monuments Survey](#)

³¹³ [Heritage Delivers | Treasure the Past, Enrich the Future](#)

³¹⁴ [Market Failure Analysis of the Heritage Sector in Northern Ireland](#)

³¹⁵ [Heritage Delivers | Treasure the Past, Enrich the Future](#)

³¹⁶ [Heritage in a Circular Economy | Heritage Counts | Historic England](#)

³¹⁷ [Nation Brands Index | The Executive Office](#)

³¹⁸ [CULTURE AND HERITAGE CAPITAL: MONETISING THE IMPACT OF CULTURE AND HERITAGE ON HEALTH AND WELLBEING](#)

- Whilst designated Heritage assets are also risk due to market failure (see above), undesignated assets are at exacerbated risk of market failure due to lack of regulation (see also CAMSAR³¹⁹ Report findings); 16,062 Historic buildings worthy of recording are included on the NI Buildings database – this means that circa 7,000 heritage assets were worthy of survey and are recorded but fell short of being of ‘special interest’, but since 2015, no councils in NI have used their powers to create ‘local lists’ of heritage assets as part of the development of Local Development Plans which include a review of Conservation Areas, ATCs and AVCs. This is a loss of potential.
- *‘Funding challenges across recent years have been compounded by the impacts of COVID, the impact of high inflation on costs and the pressure on the disposable incomes of users. Decisions made in terms of public funding to the historic environment sector have been a regrettable consequence of the need to prioritise.’³²⁰*

Alternatives:	• Do-nothing/Business as Usual – Up to date information is required to understand fully the economic contribution of the Historic Environment particular to NI. Currently, this data is lacking, and therefore though the ‘Conservation deficit’ is understood and research confirms that it exists for NI, data about the inverse (how investment in heritage has dividends which may be non-monetary) is not yet understood for NI. Examples like the ‘House of Good³²¹’ and ‘Green Book Social Value Model³²²’ exist which offer some potential to consider the benefits of investment in heritage, but at the moment the methodology is not user friendly, applies to specific building types or projects and/or is not universally accessible.
Selection:	• Collaborating with others to magnify an evidence base for the catalytic effects of heritage investment • <i>‘Quality, cared for historic landmarks that are integral to places and communities are the visible signs of valuing and investment in communities. The restoration and re-use of historic buildings and places for commercial and community or creative-use is not only popular but offers significant wealth-generation potential and has been at the heart of some of the most successful culture-led regeneration projects.’³²³</i> • Through a more thorough understanding of how heritage assets act as springboards to stimulate positive social, economic and environmental impacts, an overarching HE Policy can capitalise on how investment can realise those impacts. When the added value - advantages like better health, opportunities for learning, cross-sectoral skills and employment, regeneration and community value - are measurable and direct, investing in NI’s historic environment will more visibly make common sense.

³¹⁹ [CAMSAR_Report.pdf](#)

³²⁰ From HCC Framework – check ref later

³²¹ [The House of Good | National Churches Trust](#)

³²² [Guide-to-using-the-Social-Value-Model-Edn-1.1-3-Dec-20.pdf](#)

³²³ The Heritage Alliance – Heritage Creates - [Layout 1](#)

	- Government is best placed through Policy to collaborate with others to collect and measure evidence, putting solid proof forward to achieve this aim. Policy of measuring and monitoring could demonstrate that our historic environment is of value to us all - delivering for, the planet, for peace, and for places. But most of all, delivering for people. Understanding more fully the situation of the Historic Environment particular to NI will be the first step to further HE Policy aims which support activity to: - collaborate with others to create and strengthen an evidence base to magnify the catalytic effect of heritage investment and monitor it for growth. - collaborate with others to create and strengthen understanding of the wellbeing, quality of life and social values which can be acquired using the historic environment. - showcase, promoting and marketing our unique historic environment locally and internationally - maximise the role of councils, community or voluntary groups, voluntary organisations and individuals in the promotion, protection and enjoyment of their heritage assets. - Create evidence to show how much the historic environment quantifiably contributes to circular economy emphasises the use of renewable, non-toxic, non-polluting and biodegradable materials with the least life-cycle impacts. 'Private investment in the historic environment can be profitable – the 'heritage premium'³²⁴ is a true economic tool which can generate wealth – one where we can all enjoy the benefits.		
Potential for Monitoring: HEADLINE METRICS	- New Stat - SIC and SOC CODES – the contribution of the Heritage Sector to NI and UK Economy - NUMBER AND TREND (% annual increase or decrease) (DfE?) - New Stat - Average Leverage for Listed Building Grant scheme - for every £ invested - generates X and saves X - New Stat - HED Support for repairs in pounds (NIESR TABLE DfC Historic Environment Fund) - expressed as a future saving amount paid forward through maintenance as a % - spending X saves Y		
Potential for Monitoring: SUPPORTING METRICS	- No. heritage assets supported per year – Rural/Urban breakdown - New Stat - Archaeology 2030 - % of action points on 'Green'		
Effects on SEA Objectives:	Material Assets	++	Strong evidence-building supports sustainable reuse of buildings and infrastructure, encourages use of traditional materials, tackles neglect, and promotes reuse as climate action

³²⁴ Investing in heritage is not just an investment in heritage but part of a strategic move that can directly influence local economic outcomes. As businesses set up in distinctive, historic buildings, they benefit from the competitive advantages that the heritage brings, attracting people and investments to place, boosting the local economy. [Heritage and its Role in Development | Heritage Counts | Historic England](#)

	Landscape	++	A stronger evidence base reinforces protection of landscape character, distinctiveness and scenic value.
	Population / Health	++	Improved understanding of heritage value increases access, community participation, and enjoyment—enhancing wellbeing and quality of life.
	Climatic Factors	+	Evidence supports reuse as a low-carbon alternative, reducing emissions and improving climate adaptation.
	Biodiversity, Flora, Fauna	+	Positive heritage evidence complements actions that protect habitats and natural spaces.
	Air, Water and Soil	?	More visitors may increase travel-related impacts, though these can be managed through planning controls (e.g. SPPS).
	Cultural Heritage	++	Evidence gathering strengthens safeguarding of designated, undesignated and at-risk heritage assets.

8.5.3 Policy Aim 15: - Driving innovation and enterprise in the historic environment sector towards research, new technologies and new ways of working

Existing Baseline:

- Though there are numerous projects exploring technology and innovation around the historic environment ongoing, information about these is piecemeal. A publication ‘Heritage Delivers³²⁵’ was first published in 2020 as ‘Heritage Statistics at 31 March 2020’ and has been fully revised and published as ‘Heritage Delivers 2026³²⁶’ by the NI Historic Environment Stakeholder Group.
- There is little information publicly available on higher education research analysis, new technologies and digital development in the Historic Environment for Northern Ireland, though a ‘Heritage Hub’ exists at Queens University³²⁷ and a page representing a place marker for this data for the University of Ulster also exists³²⁸.

Environmental Problems:

- As above – this field is largely invisible in NI, and therefore it is difficult to measure / visualise the potential which can be seen elsewhere – for example in England³²⁹, Scotland³³⁰, Wales³³¹ and the Republic of Ireland³³².

Alternatives:	• Do-nothing/Business as Usual – There is already innovative examples of work going on in the heritage sector which as the potential to help the historic environment, but also to help others who wish to use, understand or better access it. For example: ○ LIDAR (Light Detection and Ranging) and photogrammetry surveys, used to locate buried archeology can help to locate and avoid potentially important archaeology in development sites without having to dig (saving time and money on excavations). ○ GIS, remote sensing, or predictive modelling of heritage assets and their settings could support climate resilience planning
----------------------	---

³²⁵ [Data, evidence and research | Heritage Delivers](#)

³²⁶ [NI HERITAGE DELIVERS 2026 CASE STUDIES AND STATISTICS ON HOW HERITAGE BENEFITS NORTHERN IRELAND | Heritage Delivers](#)

³²⁷ [Heritage Hub | Heritage Hub](#)

³²⁸ [Heritage and Museum Studies Research - Ulster University](#)

³²⁹ [Research: Historic England's Research Findings for the Built, Archaeological and Marine Historic Environment | Historic England](#)

³³⁰ [Archives and Research | Historic Environment Scotland](#)

³³¹ [Research | Cadw](#)

³³² [Research & Data | Our Projects & Programmes | The Heritage Council](#)

	○ In the route to net-zero, re-use of buildings and structures means that access to existing plans and details can be the starting point for computer modelling (saving time and money on surveys). ○ The development of the internet has revolutionised the potential for research. ○ However, there is little visibility or access to this research, meaning that the opportunity to use, promote or understand the gaps is not there at present, and would remain so without an overarching oversight which could connect this information across a wide range of groups/interested parties.
Selection:	Driving innovation and enterprise in the historic environment sector towards research, new technologies and new ways of working To meet this aim HE Policy can support innovative ideas to capitalise on and expand on the use of a wealth of knowledge. • New research and digital records could mean better understanding, achieved through improved access for everyone to analysis, archives, artefacts, museum collections and other heritage records (bringing new information to light). • Digital does not mean exclusive to researchers or academics. Contemporary presentation and interpretation of heritage could include the better use of technology (bringing heritage to new audiences). For example: <i>The HEARTH project at the Rural Community Network is funded by the National Lottery Heritage Fund and aims to amplify rural heritage and rural communities. Rural communities right across Northern Ireland are supported through networking events, one on one support sessions, a Community Development skills programme and a Heritage Skills Programme throughout the two years of the project. We are running a Digital Folklore, Stories and Mapping ...We were inundated with signups, but we are aware that there is a real desire for training and support around oral history recording right across Northern Ireland in rural areas. We often hear community groups say they are afraid of stories, folklore, traditions being lost if they aren't recorded and protected. This programme is aimed at placing these digital skills right in the heart of rural areas.</i> Emma McAleer, Rural Community Network • Having access to information about the historic environment doesn't mean looking backwards. In the future, access to archives will save time and money – for example within the growth and development of our historic towns and cities. • HE Policy can support re-use/meanwhile use/re-visioning, exploring the potential for innovative uses- potentially marketing to the youth and cultural/ creative sectors with potential for targeted outcomes relating to social value and peacebuilding through shared spaces for innovation
Potential for Monitoring: HEADLINE METRICS	BRIGHTER FUTURES – • New Stat - Number of HEF Research and Innovation Projects Supported • *Number of Higher Education PhDs in Heritage related subjects
Potential for Monitoring:	• New Stat.. Investment in research on the specific climate change challenges and opportunities for heritage assets

SUPPORTING METRICS			
Effects on SEA Objectives:	Material Assets	++	Innovation significantly improves sustainable reuse of buildings/infrastructure, supports traditional materials, tackles neglect, and enables climate-positive reuse.
	Landscape	++	New technologies strongly enhance protection of landscape character, distinctiveness and scenic value.
	Population / Health	+	Innovation improves access, understanding and engagement, strengthening quality of place and community wellbeing.
	Climatic Factors	+	Innovation improves access, understanding and engagement, strengthening quality of place and community wellbeing.
	Biodiversity, Flora, Fauna	+	Innovative approaches complement and support wider biodiversity protection
	Air, Soil and Water	+	Minimal direct impact, with potential benefits for marine and environmental research.
	Cultural Heritage	++	Innovation greatly strengthens the safeguarding of designated, undesignated and at-risk heritage assets.

9 Transboundary considerations

Existing Baseline

- DfC's Historic Environment Division recently confirmed support for the joint UK and Ireland Research Agenda for Climate Change and Heritage led by Historic England. DfC will continue to work with our sister organisations and wider partners to ensure that the value of our heritage can be realised, that the effects of climate change can be fully understood and that our heritage is protected for future generations to enjoy
- Memoranda of Understanding exist between Northern Ireland Government and Republic of Ireland Government on the Historic Environment with regard to Heritage Skills, Climate Change and Vernacular Architecture.
- These MOUs form the basis of transboundary shared research and strategies targeted at climate change impacts and a shared need to protect often undesignated vernacular heritage buildings and landscapes.
- Currently, Shared-Island funding and the sharing of ideas is limited to larger scale government initiatives. Positively, these relate for example to the exploration of an All-Island Heritage Skills Centre for Heritage, and for example funding for a writer's centre at Bellaghy Bawn, a State Care Site.
- Armagh City, Banbridge and Craigavon Borough Council have been awarded a 'Heritage Places' grant, from the National Lottery heritage Fund, to promote, celebrate and use heritage to deliver for this council area.
- HED works with DCMS, Historic Scotland and Cadw informally, meeting quarterly.
- In reality, cross border co-operation and partnership for heritage organisations is much broader – for example through the Irish Landmark Trust, all Ireland ecclesiastical dioceses, or the Commissioner for Irish Lights.
- HED and colleagues from ROI in the Department of Heritage, Local Government and Housing (DHLGH) meet regularly over matters like Shared Island funding, marine and coastal shared issues and cross-border initiatives as well as designation and research.
- Cross-border infrastructure projects (either planned, under construction or completed) have potential to improve links/tourism to heritage assets.
- At Gracehill a transboundary partnership outside of the UK or Ireland has been nurtured between Moravian Church sites in Germany, Denmark and the United States, A formal management group has been set up for the Transnational World Heritage Site with regular meetings held.

- DfC has also engaged with the United States on the US250 celebrations, highlighting the involvement of people from here printing and signing the Declaration of Independence. It is also engaging with Normandy as they develop the Year of the Normans across the UK, Ireland, Italy, Netherlands and Norway for 2027.

Environmental Problems

- Northern Ireland links to other regions of the UK and other countries can appear politicised. Unlike other parts of the UK, NI's cultural 'identity' is nuanced, making connections to other places more politically sensitive than elsewhere.
- Philanthropic funding from countries with connections to Northern Ireland such as the USA tend to be channelled through the Republic of Ireland and not directly associated with NI, which can be politically sensitive.
- There can be capacity problems with grasping the potential of philanthropic funding. For example, DfC is aware of a thatched building that, following a meeting in the USA, was highlighted as a traditional homestead associated with a particular family name and regularly receives visitors as a result. But it also faces maintenance problems that are beyond the capacity of the owner which may call its future into doubt.
- During engagement, councils reported that they had no mechanism to accept and lacked the skills in-house to manage philanthropic funding, even when it was offered.
- Central 'block' funding from the UK government to Northern Ireland which is awarded to reflect investment in Heritage in England is not protected – the block grant allocated to Northern Ireland is dispersed to government departments based upon the agreed priorities of the NI Executive.

Transboundary considerations				
Other plan/programme or strategy	Legislative basis, environmental objectives or requirements of the plan or programme	How objectives and requirements of other plans or programmes might be taken on board in Historic Environment Policy (HE Policy) or how HE Policy might impact other plans, policies or programmes	Impacts on HE Policy	HE Policy may impact outcomes

National Heritage Plan (Heritage Ireland 2030³³³)	<i>Heritage Ireland 2030 is Ireland's new national heritage plan. It is built around a vision of [Ireland's] heritage – in all its forms – being at very centre of local and national discourse, valued by all and cared for and protected for future generations.</i> <i>At the heart of this framework are three themes: communities, leadership and partnerships. These themes reflect the importance of ongoing collaboration between government and communities, heritage organisations, individuals and local authorities in caring and planning for our shared heritage.</i> <i>A key strand of this Plan is the 'Shared Island Approach', with the objective of 'maintaining and developing strong all-island partnerships in implementing all aspects of the Heritage 2030 framework including by:</i> <i>working with the Northern Ireland Executive and through the North South Ministerial Council to develop and deepen ... cooperation.</i> <i>supporting heritage through relevant areas under the auspices of the North South Ministerial Council, co-funding and supporting Waterways Ireland and The Loughs Agency as all-island bodies with important remits in the care of heritage;</i> <i>maintaining and developing cross-border agency partnerships including through the National Parks and Wildlife Service and National Biodiversity Data Centre; and</i>	Historic Environment Policy will provide high level advice on Government's attitude to the historic environment. This includes our shared objective to partner with the Republic of Ireland through transboundary co-operation and shared investment. HE Policy aims will support and enhance partnerships to better understand, share and protect shared heritage assets and landscapes their inter-related histories, settings and users.		
---	---	--	---	--

³³³ [Heritage Ireland 2030](#)

National Biodiversity Action Plan (NBAP)(ROI – 2023-27)³³⁴	• <i>supporting cross-border Local Authority cooperation and all-island civil society initiatives on shared biodiversity and heritage concerns.'</i> National datasets are available for archaeology and architectural heritage: the National Monuments Service Archaeological Survey Database; and National Inventory of Architectural Heritage.			
	<i>Ireland's 4th National Biodiversity Action Plan (NBAP) sets the national biodiversity agenda for the period 2023-2030 and aims to deliver the transformative changes required to the ways in which we value and protect nature.</i> The 4th NBAP has 5 main objectives: • <i>Objective 1 - Adopt a Whole of Government, Whole of Society Approach to Biodiversity</i> • <i>Objective 2 - Meet Urgent Conservation and Restoration Needs</i> • <i>Objective 3 - Secure Nature's Contribution to People</i> • <i>Objective 4 - Enhance the Evidence Base for Action on Biodiversity</i> • <i>Objective 5 - Strengthen Ireland's Contribution to <u>International Biodiversity Initiatives</u></i>	Historic Environment Policy will provide high level advice on Government's attitude to the historic environment. This includes our shared objective to partner with the Republic of Ireland through transboundary co-operation and shared investment. HE Policy aims will support ROI's NBAP objective to strengthen international biodiversity initiatives – in particular through the protection of landscapes and the opportunity to protect and create opportunities biodiversity within the settings of heritage assets and historic parks and gardens.	✓	

³³⁴ [Ireland's 4th National Biodiversity Action Plan 2023–2030](#)

Legislation – Planning and Development Act 2000 (including the Record of Protected Structures) And National Monuments Act (1930-2014) (including the Register of Historic Monuments and the Sites and Monuments Record)	Comparable to the ‘List’ of buildings and the Schedule of Historic Monuments, ROI has legislation and policy in place to designate and protect buildings and monuments of significance. National datasets are available for archaeology and architectural heritage: the National Monuments Service Archaeological Survey Database; and National Inventory of Architectural Heritage	These protected assets share attributes, have a shared history, share material sources (locally quarried stone, etc) architectural features, and architects with those in NI. In the border regions assets are set amongst shared landscapes, often within sight of each other. As people live across borders, to understand, conserve protect and enhance heritage assets and landscapes in NI contributes to the benefits for people in the ROI and vice versa.	✓	
Creative Ireland Programme³³⁵ – Pillar 2- Enabling Creativity in Every community	The Creative Ireland Programme encourages community-led heritage projects, and supports storytelling, cultural events and local heritage interpretation.	History and traditions are shared across borders – meaning that the benefits of public participation in heritage activity and the protection of local heritage sites and traditions in the ROI will benefit people living in Northern Ireland, and vice versa. HE Policy will support and compliment the objectives of the Creative Ireland Programme.	✓	

³³⁵ [Our Programme - Creative Ireland Programme](#)

The Heritage Council ³³⁶	The Heritage Council in an independent Statutory body advising the ROI Government on heritage. The Heritage Council supports local authority heritage officers, runs grant schemes for built, natural and intangible heritage and Ireland's Heritage Open Days. It also support the Discovery Programme, a Centre for Archaeology and Innovation in Ireland.	HE Policy will support the shared benefits of a network of Heritage Officers working across ROI and NI to share advice, research, resources and information for everyone's benefit. It shares the objective of the Heritage Council to have a dedicated Heritage Spokesperson in place at a local level to advocate for heritage, and to support research and innovation in the heritage sector to advance our shared understanding.	✓	
MOUs	Memoranda of Understanding exist between Northern Ireland Government and Republic of Ireland Government on the Historic Environment with regard to Climate Change and Vernacular Architecture	These MOUs form the basis of transboundary shared research and strategies targeted at climate change impacts and a shared need to protect often undesignated vernacular heritage buildings and landscapes. In reality, cross border co-operation and partnership for heritage organisations is much broader – for example through the Irish Landmark Trust, all Ireland ecclesiastical dioceses, or the Commissioner for Irish Lights. HED and colleagues from ROI in the Department of Heritage, Local Government and Housing (DHLGH) meet regularly over matters like Shared Island funding, marine and coastal shared issues and cross-border initiatives as well as designation and research.	✓	✓
Scotland: Our Place In Time ³³⁷ and 'Our Past, Our Future' ³³⁸ - Historic	<i>Led by Historic Environment Scotland, this strategy was created following a public consultation, in collaboration with 10 organisations representing Scotland's heritage sector including the Scottish Government, to create a new national strategy for those working in the public sector and beyond.</i>	HE Policy will support the shared benefits of a network of partners working across the UK and NI to share advice, research, resources and information for everyone's benefit.	✓	

³³⁶ [The Heritage Council](#)

³³⁷ [Our Place in Time: the Historic Environment Strategy for Scotland - gov.scot](#)

³³⁸ v

Environment Strategy for Scotland	<i>The strategy, which builds on the previous strategy ‘Our Place in Time’, is intended to provide a roadmap for the next five years and highlights the sector’s shared ambition to make a responsible contribution to Scotland’s economy and use the historic environment to improve people’s wellbeing. It also has a strong focus on the transition to net zero alongside a forward-looking ambition to empower communities and build a wellbeing economy.</i> <i>Scotland’s historic environment plays a key role in the country’s economy, sustaining 68,000 full-time equivalent jobs and generating £4.4 billion per year pre-COVID pandemic. These numbers are expected to increase by an estimated 10,000 new jobs over the next decade to maintain and adapt Scotland’s traditional building stock.</i> <i>The strategy also sets out the goal of further retrofitting and putting Scotland’s traditional buildings back into use; estimates put these buildings at representing 19% of Scotland’s housing stock, 33% of retail space, and almost 50% of spaces used by the public sector.</i>			
England – DCMS’ International Cultural heritage protection programme³³⁹ and	<i>Since 2015 the Department for Culture, Media and Sport (DCMS) has worked with partners including the British Council, the Arts and Humanities Research Council, UNESCO, the Organization for Security and Co-operation in Europe, the Victoria and Albert Museum and the British Museum to deliver cultural heritage projects in ODA</i>	HE Policy will support the shared benefits of a network of partners working across the UK and NI to share advice, research, resources and information for everyone’s benefit.		

³³⁹ [DCMS's International Cultural Heritage Protection Programme - GOV.UK](#)

Historic England Future Strategy³⁴⁰	<i>eligible countries across the Middle East, North Africa, East Africa, Southeast Asia and Eastern Europe.</i> <i>In addition to promoting economic development, culture plays a role in peacebuilding, security and stability, as well as building resilience to crises in fragile and conflict-affected States. This highlights the vital role that protecting culture and cultural heritage plays in the UK's international development agenda.</i> <i>Objectives</i> <i>Through a portfolio of delivery partners, the International Cultural Heritage Protection (ICHP) Programme works across 4 integrated themes to ensure the protection of cultural heritage: conflict and security, climate change, serious and organised crime, and research.</i> <i>[The] Vision at Historic England - 'Championing Heritage - Improving Lives' is for a heritage that is valued, celebrated and shared by everyone. Our Future Strategy, which started in 2021, is about how [they] will make that Vision a reality.</i>			
Wales	Though the Welsh Government does not have a published Historic Environment Strategy: <i>'As the Welsh Government's historic environment service, Cadw is aptly named. The Welsh verb cadw means "protect", "keep" or "preserve", and that's exactly what the organisation does. Its mission is to look after the nation's heritage sites – helping visitors enjoy them now, and ensuring they can endure for generations to come. In a</i>	HE Policy will support the shared benefits of a network of partners working across the UK and NI to share advice, research, resources and information for everyone's benefit.		

³⁴⁰ [Historic England Future Strategy | Historic England](#)

	<i>nation reputed to have more castles per square mile than any other, it's a big task.</i> <i>Cadw's broader vision is to help create a Wales where heritage sites are cared for, understood and shared by everyone. It's a recognition of the vital role these places play in the Welsh cultural identity, providing a living link to our common history.'</i>			
USA 250³⁴¹	USA 250 is an example of international heritage connections between the USA and NI. NI has '<i>.. always had strong cultural and historical bonds with the United States with early settlers from Northern Ireland playing a significant role in communities across the US.'</i>	HE Policy will support the shared benefits of a network of partners working globally across heritage networks; information sharing, sharing research and connections to people who also value their own place brings benefits to local heritage in NI.		✓
Year of the Normans – a European Cultural Trail³⁴²	The Regional Council of Normandy has invited stakeholders from Normandy, France, the United Kingdom, the Channel Islands, Ireland, regions of Southern Italy, Flanders, Norway and Denmark to respond to this call to create the programme for a major one-year event. This is an example of how transboundary common heritage connections which stretch beyond borders can have a positive effect on how NI values and understands its past and present historic environment.	HE Policy will support the shared benefits of a network of partners working across European heritage networks; information sharing, sharing research and creating connections to people who also value their own place brings benefits to local heritage in NI.		✓

³⁴¹ [Minister Lyons announces £250,000 for America 250 celebrations | Department for Communities](#)

³⁴² [2027, European Year of the Normans | Région Normandie](#)

9.1.1 Policy Aim 16: Embedding transboundary and international cooperation into the historic environment sector

Alternatives:	• Do-nothing/Business as Usual – Northern Ireland’s heritage is of interest to us but also to the world. For example, the small Moravian village of Gracehill in Co Antrim, Northern Ireland was designated as a Transboundary World Heritage Site on Friday 26th July 2024. Similarly, Vernacular heritage traditions are also part of a shared culture of building that is found throughout the world. Thus, our vernacular heritage reflects the creativity of our forebears, provides a link with the past and is worthy of global interest. • In fact, Northern Ireland shares historic links with many parts of these islands and the world – like the Ulster Scots traditions in Scotland, the Anglo-Norman English who built many of our castles to the Republic of Ireland with whom we share many archaeological similarities and vernacular traditions, the Moravians in Germany and America demonstrated at the Transboundary World Heritage site in Gracehill, links to the Vikings in Northern Europe,. Maximising philanthropic interest can mean the sharing of knowledge across borders on shared heritage as well as advice, support, resources, people and funds. To ‘do-nothing’ would not take advantage of this potential.
Selection:	Broadening transboundary and international cooperation with the historic environment sector • Our historic environment has value to people in Northern Ireland, but it also has wider shared island, pan-UK and in fact transboundary significance – it has global value. To achieve this aim, HE Policy can recognise that having been shaped by globally important historic events, NI’s historic environment offers opportunities to relate with others internationally who feel connected to us. • Now and in the future, high-level Policy can work to boost international and cross-boundary partnerships that amplify and help us to see the unique value of our historic environment from a global perspective. This work will underpin a vision to conserve, protect and enhance the Northern Ireland historic environment for future generations – and people everywhere.
Potential for Monitoring: HEADLINE METRICS	GLOBAL CONNECTIONS • ROI/NI and UK/NI Transboundary World Heritage Bids • International Funding - All Island/Shared Island Funding/UK equivalent/DfC • Heritage Tourism Jobs in NI (NISRA NI Visitor attraction survey) - NUMBER AND TREND (% annual increase or decrease) (NISRA)
Potential for Monitoring: SUPPORTING METRICS	• Number of Transboundary/World heritage sites • Number of visitors to World Heritage sites

Effects on SEA Objectives:	Material Assets	++	International cooperation strengthens material assets through shared expertise, advice, and potential financial support.
	Landscape	++	Cross-border cooperation enhances protection of landscape character and scenic value across interconnected land- and seascapes.
	Population / Health	++	Global collaboration inspires learning, enjoyment and wellbeing by connecting people to shared heritage and landscapes.
	Climatic Factors	+	Exchanging knowledge internationally improves understanding of climate impacts and adaptation approaches.
	Biodiversity, Flora, Fauna	+	Collaboration supports shared learning on biodiversity and habitats, especially where ecological systems span regions.
	Air, Soil and Water	+	Limited direct effects, with positive potential through joint marine and coastal environmental initiatives.
	Cultural Heritage	++	Strongly positive for cultural heritage through shared histories, deeper international understanding, and peace-building benefits.

9.1.2 Policy Aim 17: Proudly showcasing, promoting and marketing our unique historic environment

Existing Baseline:

- *‘Representing 40% of the visitor market, cultural tourism is taken increasingly seriously by cities and regions the world over. It delivers rich and memorable experiences. It triggers the imagination. It connects visitors with the landscape and the heritage, art and ideas of the host community. It builds up a story of a place, where it has come from and where it is going. It creates compelling destinations, known for what they stand for as well as what they offer’.*³⁴³
- In the Owners’ Survey³⁴⁴ a very high proportion of respondents (84%) said that their listed building is important or very important to the character of their local area. Furthermore, 60% said that their listed building is important or very important to the appeal of their local area to tourists and 45% said the same about investment in their local area.
- In the Monument Owners’ Survey³⁴⁵ 40% of Monument owners felt there were advantages to owning a monument. Of these respondents, just under 90% reported that feeling part of history or heritage was one advantage, whilst over 60% said that advantages included a sense of pride/feel good factor or the scheduled monument provided a local landmark/local community value.
- In the nations Brand Index 2025, Northern Ireland’s top two Attributes were ‘Natural Beauty’ (20th out of 50) and ‘Environment’ (21st). Since 2016, all 23 Attribute scores for Northern Ireland have shown improvement. The most notable increases were in respondents’ willingness to ‘work and live’ in Northern Ireland (+0.35) and perceptions of Northern Ireland as being ‘rich in historic buildings’ (+0.29). In terms of ranking, ‘historic buildings’ (along with ‘natural beauty’) achieved the largest improvement, each rising three places.³⁴⁶

Environmental problems:

- Funding directed at place-making or tourism is mainly targeted at ‘experience’, it does not currently provide capital to repair and maintain heritage assets which means that their condition is deteriorating as described in section 6.2.1.
- Opportunities are being missed for example to align the care and maintenance of churches with tourism provision; training, mentoring and volunteering is needed, though there is an appetite as demonstrated by the National Churches Trust ‘Treasure Ireland’ project tourism pilot.

³⁴³ NI Culture Heritage and Tourism Leadership Group action plan, CT consultants for TNI, December 2023 p3.

³⁴⁴ [LBOS](#)

³⁴⁵ [MOS](#)

³⁴⁶ [Nation Brands Index | The Executive Office](#)

- There are many privately owned heritage assets – like thatched cottages – which are photogenic and have scenic value, but do not generate sufficient funding to be self-sustaining due to the ‘Conservation Deficit’.³⁴⁷
- Marketing is not considered to be an ‘essential’ for HED, as it is not a statutory function based in legislation. This means that it can be stripped out of budget lines when these become tight. Whilst large heritage bodies and organisations like the National Trust, Historic England and Historic Scotland have invested in a ‘brand’ including highly illustrated websites, merchandise and events co-ordinators, these activities are ‘extras’ and ‘nice to have’ for HED. Principally through tourism, the core business of these organisations is how their country/brand represented something essential about itself to its own people and to visitors; this is currently lacking in HED.

Alternatives:	• Do-nothing/Business as Usual – there are many historic locations, monuments, buildings and places in Northern Ireland such as Conservation Areas, Cultural Landscapes, Council owned historic parks and gardens, etc. which showcase heritage. Relying on individuals to provide heritage assets without support is not financially viable. These assets often sit in isolation and are not part of an overall high-level, targeted, measurable and joined up strategy to showcase heritage in NI. A joined-up overview could maximise the links between showcasing natural and man-made heritage. • Focus on State Care - DfC owns 167 State care monuments, however one fifth need maintenance and several are closed. A State Care Investment Plan has been approved which could maximise the condition, access and use of these buildings but this plan has not yet been funded. State Care assets would contribute to tourism within an ecosystem of care and management, however this is not currently resourced. Heritage assets in good condition all over Northern Ireland would have a wider impact across broader groups of people, contributing further to free and paid for enjoyment of heritage. A strategy to help owners of heritage assets to benefit from tourism would potentially help to make heritage more economically viable, reducing the Conservation deficit and creating a more positive heritage premium.
Selection:	Showcasing, promoting and marketing the our unique historic environment • In Northern Ireland we have quite literally thousands of potential opportunities to showcase, promote and market our historic environment. An opportunity exists to create HE Policy which coordinates caring for and marketing of heritage with tourism – local and international – in one sphere of investment. Good places are good for local people but also bring visitors - recognizing the potential of investment in place-based heritage to contribute to our everyday quality of life but also to tourism and therefore the economy. People who visit heritage sites stay longer and spend more³⁴⁸.
Potential for Monitoring:	• Numbers of Tourism NI visitors % to heritage (Tourism NI) • % top 10 NI visitor attractions are heritage – trend Visitor Attitude Survey (Tourism NI)

³⁴⁷ ‘Conservation deficit - The amount by which the cost of repair (and conversion to optimum viable use if appropriate) of a heritage asset exceeds its market value on completion of repair and conversion, allowing for all appropriate development costs.’ [HEAG](#)

³⁴⁸ Robert Merton Solow, Nobel Prize winning economist, in Licciardi et al, 2012. [Heritage and its Role in Development | Heritage Counts | Historic England](#)

HEADLINE METRICS	Visitor Attraction Survey compiled annually by NISRA shows the rise in popularity of cultural and heritage attractions		
Potential for Monitoring: SUPPORTING METRICS	- Number of Heritage Angels awards (DfC) - Social media stats (DfC/NT/AHF/UAH) - Tourism NI stats on heritage venues, heritage accommodation/holiday lets / heritage events (Tourism NI) - Annual £ - State care investment (DfC) - Annual £ - Council/gov't investment in key heritage buildings (SIB)		
Effects on SEA Objectives:	Material Assets	++	Showcasing heritage strengthens protection, maintenance, reuse and enhancement of historic places and their settings.
	Landscape	++	Increases awareness, appreciation and access, supporting protection of landscape character and scenic value.
	Population / Health	++	Inspires learning, enjoyment and connection to historic places, enhancing wellbeing and community pride.
	Climatic Factors	+	Protecting and retaining assets has climate benefits; local tourism may offset emissions from travel abroad.
	Biodiversity, Flora, Fauna	+	Creates synergies between natural and cultural sites, reinforcing appreciation of NI's unique combined heritage
	Air, Water and Soil	?	Increased visitation may raise traffic impacts; effects uncertain but mitigable through planning controls (e.g. SPPS).
	Cultural Heritage	++	Strongly enhances protection, awareness, appreciation and access, showcasing NI's distinctive culture and landscape.

9.2 Alternatives to an HE Policy

The SEA process considers alternatives. At a strategic level the alternatives considered by the Department were those which concluded that a Policy for the Historic Environment is needed for Northern Ireland. The consideration of these alternatives is outlined in **the table below**.

Table 4 – Alternatives considered to an HE Policy for Northern Ireland

Alternative	Consideration	Decision
Do nothing (business as usual)	In 2025 the Condition Survey of Listed Buildings³⁴⁹ was published indicating a decline by 24% in the condition of buildings in 20 years (having doubled in a decade). Heritage at Risk figures in Northern Ireland show a doubling of vacant heritage buildings since 2018³⁵⁰. This demonstrates a need for action to protect the historic environment from further decline. Research³⁵¹ in other jurisdictions (UK, ROI) tells us that cared for heritage places and assets can have a positive effect on people's lives for example through enjoyment of, employment, improved wellbeing, quality environments, pride of place and community cohesion. Research³⁵² also shows that re-using buildings could offer an opportunity in NI to mitigate against climate change, saving carbon when compared with new build. This, combined with a need in NI for housing, demonstrates a need to consider the	There has never been an HE Policy in Northern Ireland. However, the current problems for the Historic Environment in Northern Ireland, combined with the missed opportunities to use the historic environment to improve people's lives, meet their needs and address climate change issues make this 'do nothing option' untenable. It is unlikely that the need to address the decline of the Historic Environment can be met without implementing an HE Policy.

³⁴⁹ [Listed Buildings Survey](#)

³⁵⁰ The 2023/24 figure of 1,111 heritage assets on HARNI is just over double the 527 structures recorded in 2018/19.

³⁵¹ [Wellbeing and Historic Environment: Why Bother? | Historic England](#)

³⁵² [Whole Life Carbon Guidance | Department for Communities](#)

	possibilities that an HE Policy might have for meeting wider Programme for Government needs. HE Policy is an opportunity to join together, understand and action the relationship between a cared for historic environment and the return from that for people.	
Support Councils to create local ‘Heritage Plans’ rather than having an overarching HE Policy	The Department helps local councils to support communities through oversight of Community Planning and regeneration projects. However, the Department does not have powers to direct councils to create Heritage Plans to care for, enhance and use of their historic environment. In 2018– 2021 the Department supported Derry City and Strabane District Council to create their Heritage Plan as a pilot. Whilst this 3-year project successfully delivered DSDC’s Heritage Plan, the Plan was restricted to one 11th of NI. The Department’s annual budgets do not currently allow for projects to extend over one financial year. Whilst there has been engagement and research carried out by HED with Government Departments, Councils and heritage asset owners, as there has been no HE Policy to date, there has been no opportunity to gather wide public opinion through public consultation on the management of the Historic Environment in NI.	Through engagement and consultation, HE Policy will represent a unified attitude to the historic environment. This will still allow for Heritage Plans to be created in councils but will unify those plans and fill any gaps – ensuring that just as the historic environment exists in every corner of NI, so doe HE Policy to manage and enjoy it. Creating a universal policy which goes out to public consultation across NI offers the opportunity to collect a wide and more comprehensive view on people’s attitude and hopes for the historic environment in the future.
Manage the historic environment reactively through statutory duties	In many respects this is the ‘business as usual’ option, because HED carries out its statutory duties to respond to planning applications for designated assets as a consultee of Planning Departments within each of the 11 District Councils.	It is unlikely that the need to address the decline of the Historic Environment can be met through penalty. Experience tells us that whilst enforcement and reactive protection is needed, it does not win ‘hearts and minds’ and has in some cases led to resentment of protection. In the Second Survey for example, reactive listing has led to several cases of

	However, HED requested that councils investigate 56 new enforcement cases between March 2021 and March 2023, of these, a significant number did not go 'live'. Furthermore, Urgent Works Notices (UWNs) have not been actioned by councils, with a shared 'pot' of funding between all 11 councils potentially being inadequate to cover the costs of carrying out UWNs concurrently across all councils, and a reluctance in some councils where there is less heritage expertise to implement Buildings Preservation Notices (BPNs).	bad press about listing. The Listed Building Owners Survey (HED 2025)³⁵³ correlated value with care: it concluded that those that 'value' their heritage assets are more likely to keep them in good condition. A holistic and forward looking HE Policy which brings out and supports both local statutory powers to enforce protection alongside evidence for the benefits to people of protection and enjoyment of heritage assets is a much better footing on which to bring the care of the historic environment forwards.
Improve the Historic Environment by creating a number of separate strategies	Again, in some respects this is a 'business as usual' option. Strategies like Archaeology 2030, and a draft Heritage at Risk strategy are underway independent of each other.	Having an overarching HE Policy gives the opportunity to create a cohesive whole, whereby it can be shown that collective actions contribute to a greater whole. Creating a universal policy which goes out to public consultation across NI offers the opportunity to collect a wide and more comprehensive view on people's attitude and hopes for the historic environment in the future.
Create short, annual or 3 year strategies for the Historic Environment	Given the time taken for engagement (2022 – 2025), this is unlikely to produce as comprehensive a policy as one which maximises engagement and takes a long-term view. The historic environment does not change quickly. It is a testament to its resilience that many buildings which are on the HARNI list have been vacant for longer than 10 years. There are no 'quick' wins for an historic environment where the needs include the building up over time of skills, a change in public perception and a longer-term change in value.	A long-term view is needed to maximise the impact of Historic Environment Policy. This also gives time for the cumulative and synergistic positive effects of HE Policy on people to be realised, understood and collated, which could then be evidenced in a Policy review in 10 years' time.

³⁵³ [Listed Buildings Survey](#)

Create an HE Policy with Public Consultation	There has never been and Historic Environment Policy for Northern Ireland. Leadership and a high-level government overview is needed to give weight to the economic and social benefits of the Heritage Sector, creating a platform for high-level mutually beneficial partnerships between departments and local government. A long term view is needed to understand and make visible the benefits of a cared for and protected Historic Environment to people for whom heritage is not currently considered 'accessible'. The Historic Environment is in decline. Decisive, planned, long-term action is needed to address this decline – and realise the potential benefits for people everywhere to be gained from a reversal in decline.	A long-term view is needed to maximise the impact on and of Historic Environment Policy on people, places and the planet. This also gives time for the cumulative and synergistic positive effects of HE Policy to be realised, understood and collated, which could then be evidenced in a Policy review in 10 years' time. Public Consultation will ensure that the views of HE Policy which demonstrates government's attitude to the potential of Northern Ireland's historic environment, is a material consideration in decision making at high-level ,which has a vision, clear goals and measurable metrics which are monitored will be the most effective tool to deliver change and reward for people in Northern Ireland.
---	--	--

Enhancing Beneficial Effects

HE Policy aims are expected to have beneficial effects on Northern Ireland's historic and wider environment. This is particularly so when compared to the 'do nothing' alternatives in the sections of this report to follow as many aspects of the historic environment are currently in poor and/or deteriorating condition. HE Policy's strong focus on sustainable development, climate change, health and wellbeing, and quality environments will add a 'halo effect' to the benefits delivered for the historic environment. However, many of these cross-benefits will be the result of partnerships and cannot be realised by HE Policy alone.

As the development of HE Policy continues through public consultation, further alternatives may be suggested by consultees, the heritage sector and/or the general public. Consideration of these will be included the Stage D SEA Post Adoption Statement.

10 Draft Historic Environment Policy – Summary of Aims

The following Matrix summarises the proposed Policy aims under the Objectives of **Strengthening, Connecting and Innovating**, as described in Section 2.4.

Historic Environment Policy Vision: ‘Our People. Our Past. Our Place An inclusive and valued historic environment that delivers for Northern Ireland.’

Policy Aims

		1. People and Communities	2. Places	3. Partnerships
Historic Environment	Strengthening: A well-cared for historic environment where best practice is universal.	1. Developing best practice to identify and safeguard our historic environment 2. Developing a highly skilled workforce to conserve and sustainably develop our historic environment	3. Investing in the capacity of owners, volunteers and organisations to care for and use local historic assets to meet their needs 4. Empowering communities to adapt, enhance and re-use historic assets, drive regeneration and shape distinctive places	5. Using heritage assets to contribute to Programme for Government including the Wellbeing Framework: Stronger Economy, Better Homes, Healthier Lives and Brighter Futures 6. Maintaining and managing the historic environment in the face of environmental problems
	Connecting: Thriving places - where the unique value of heritage is understood and enjoyed.	7. Supporting inclusive and diverse access to historic places for everyone 8. Exploring the potential for historic places to support wellbeing, and quality of life	9. Aligning the care of heritage assets with distinctive places, landscapes, and seascapes, supporting biodiversity 10. Proudly showcasing, promoting and marketing our unique historic environment locally and internationally 11. Embedding transboundary and international cooperation into the historic environment sector	12. Partnering with government departments, public bodies, and agencies, as well as asset owners, land owners and volunteers, to use the historic environment creatively 13. Reaching out: supporting heritage education and activity for inspiration, learning and enjoyment. 14. Evolving our shared understanding through accessible research, surveys, records, artefacts and archives
	Innovating: A flourishing historic environment sector which is protected, sustained, accessed and used to its full potential .	15. Emphasising the contribution of our historic places to peace - community cohesion, good relations and healing through heritage	16. Collaborating with others to magnify an evidence base for the catalytic effect of heritage investment	17. Driving innovation and enterprise in the historic environment sector towards research, new technologies and new ways of working

Our People. Our Past. Our Place: an inclusive and valued historic environment that delivers for Northern Ireland.

11 Next Steps

11.1 Proposed consultation timescales and methods

The SEA Guide produced jointly by the four UK governments in 2005, in common with other SEA guidance documents, sets out a five-stage process (A to E) for carrying out SEA. This is included at Appendix 1 and 1b.

11.2 Stage D – Public Consultation

Draft HE Policy and the SEA Environmental Report are now presented for public and statutory consultation over a 12-week period in Spring 2026. This will include an easy-read version of the Policy.

The statutory consultation Body for NI is DAERA. The SEA Environmental Report will also be issued to the relevant Consultation Bodies in the Republic of Ireland and the remainder of the UK.

Members of the public likely to participate in SEA consultation are those affected or likely to be affected by, or having an interest in the decision-making, including relevant sectoral non-governmental organisations, and heritage asset owners. The purpose of this stage is to give the public and the Consultation Bodies an opportunity to express their opinions on the findings of the SEA Environmental Report, and to use it as a reference point in commenting on the review of HE Policy.

In line with the NI SEA Regulations, the Department must take account of the SEA Environmental Report and of any opinions which are expressed upon it as it prepares revised HE Policy for adoption. Therefore, comments received from DAERA, members of the public and other stakeholders during the consultation process will be reviewed to determine their relevance.

Once the HE Policy has been adopted, an SEA Post-Adoption Statement will be produced to provide information on how the SEA Environmental Report and consultees' opinions were taken into account in deciding the final form of HE Policy.

11.3 Stage E – Adoption and Monitoring

The Northern Ireland Directive requires the Department for Communities, as the Managing Authority, to monitor significant environmental effects of implementing HE Policy. If significant effects are identified, a monitoring programme will be proposed in the form of a Monitoring Framework Document (and summarised in the accompanying SEA Post-Adoption Statement) so that the actual impacts of the policy can be evaluated.

It is suggested that a ‘Monitoring barometer’ of headline statistics is created to monitor HE Policy.

These headline statistics are proposed as follows:

Historic Environment:

*indicates new statistic to be generated

Strengthening:

*A well- cared for historic environment where **best practice** is universal.*

Connecting:

*Thriving **places** - where the unique value of heritage is understood and enjoyed.*

Innovating:

*A flourishing historic environment sector which is protected, sustained, accessed and used to its full **potential**.*

People and Communities

BRIGHTER FUTURES

Number of designated heritage assets in NI as reported in the Northern Ireland Environmental Report

SKILLS AND EMPLOYMENT

*Number of people in heritage skills training in NI (construction skills and wider heritage skills)

HEALTHIER LIVES

% of adults and young people in Northern Ireland who have visited a place of historic interest (by age) (NISRA)

*Significant positive life satisfaction difference after visiting a heritage place (NISRA)

EQUAL SOCIETY

% of adults with a disability to have visited a place of historic interest within the previous year (NISRA)

SOCIAL IMPACT

* Measurement of Social value impact of heritage buildings and projects

EQUAL SOCIETY

% difference in adults from the Protestant/Catholic community to visit a place of historic interest within the previous year

THRIVING CHILDREN

% young people visiting a place of historic interest within the previous year.

Places

SAFER COMMUNITIES

Total number of heritage assets on HAR saved – (places of deprivation, rural or urban places)

*Number of community organisations in NI that are housed within or manage a historic building or monument.

SUSTAINABLE DEVELOPMENT -

*Proportion of historic environment planning consultations that gained approval

SAFER COMMUNITIES

Listed building and monument condition

TOURISM

% increase Heritage attraction visits (annual) TNI

GLOBAL CONNECTIONS

ROI/NI and UK/NI Transboundary World Heritage Bids

STRONGER ECONOMY

*£contribution of the NI Heritage Sector to NI and UK Economy

Partnerships

PARTNERING WITH COMMUNITIES

*Number of Community Asset Transfers that are Heritage Buildings

BETTER HOMES

*Number of new social housing units in heritage buildings

STRONGER ECONOMY

*Relative % of Repair and Maintenance Output in the NI Construction Sector by quarter

CULTURAL & CREATIVE COLLABORATION

*Number of creative businesses in NI based in Conservation areas and listed buildings

*Number of Heritage Skills, Conservation and Adaptation awards in NI

BRIGHTER FUTURES

European Heritage Open Days visitors across Equality categories (NISRA)

*% HERoNI records and artefacts accessible to public – physically, digitally

BRIGHTER FUTURES

*Number of Higher Education Heritage Research and Innovation Projects Supported

12Appendices

12.1 Appendix 1a and 1b – Table and diagram : Stages of the SEA process (Source: A Practical Guide to the SEA – DAERA)

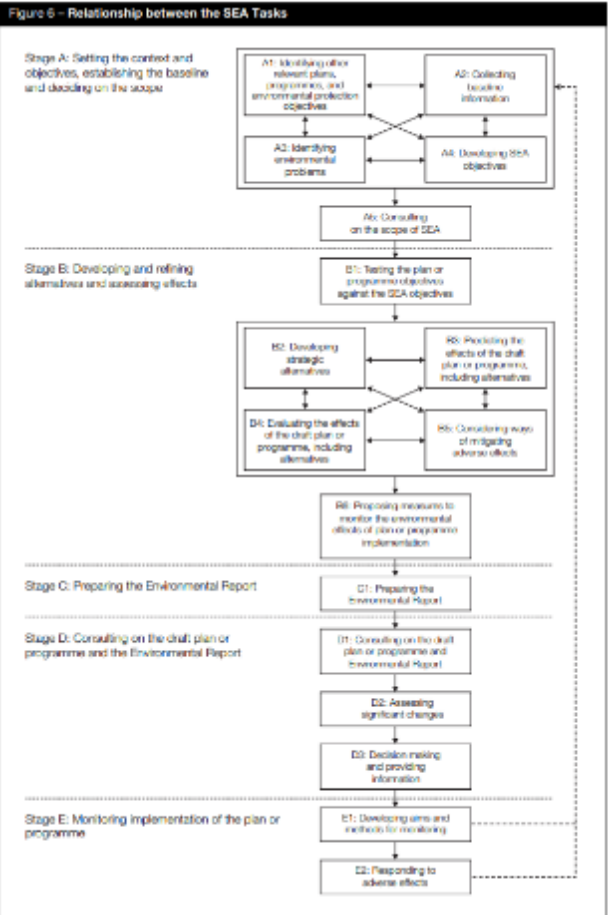


Figure 6 – Stages in the SEA process

SEA stages and tasks	Purpose
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope	
Identifying other relevant plans, programmes and environmental protection objectives	To establish how the plan or programme is affected by outside factors, to suggest ideas for how any constraints can be addressed, and to help to identify SEA objectives
Collecting baseline information	To provide an evidence base for environmental problems, prediction of effects, and monitoring, to help in the development of SEA objectives
Identifying environmental problems	To help focus the SEA and streamline the subsequent stages, including baseline information analysis, setting of the SEA objectives, prediction of effects and monitoring
Developing SEA objectives	To provide a means by which the environmental performance of the plan or programme and alternatives can be assessed
Consulting on the scope of SEA	To ensure that the SEA covers the likely significant environmental effects of the plan or programme
Stage B: Developing and refining alternatives and assessing effects	
Testing the plan or programme objectives against the SEA objectives	To identify potential synergies or inconsistencies between the objectives of the plan or programme and the SEA objectives and help in developing alternatives
Developing strategic alternatives	To develop and refine strategic alternatives
Predicting the effects of the plan or programme, including alternatives	To predict the significant environmental effects of the plan or programme and alternatives
Evaluating the effects of the plan or programme, including alternatives	To evaluate the predicted effects of the plan or programme and its alternatives and assist in the refinement of the plan or programme
Mitigating adverse effects	To ensure that adverse effects are identified and potential mitigation measures are considered
Proposing measures to monitor the environmental effects of plan or programme implementation	To detail the means by which the environmental performance of the plan or programme can be assessed
Stage C: Preparing the Environmental Report	
Preparing the Environmental Report	To present the predicted environmental effects of the plan or programme, including alternatives, in a form suitable for public consultation and use by decision makers
Stage D: Consulting on the draft plan or programme and the Environmental Report	
Consulting the public and Consultation Bodies on the draft plan or programme and the Environmental Report	To give the public and the Consultation Bodies an opportunity to express their opinions on the findings of the Environmental Report and to use it as a reference point in commenting on the plan or programme. To gather more information through the opinions and concerns of the public
Assessing significant changes	To ensure that the environmental implications of any significant changes to the draft plan or programme at this stage are assessed and taken into account
Making decisions and providing information	To provide information on how the Environmental Report and consulted parties' opinions were taken into account in deciding the final form of the plan or programme to be adopted
Stage E: Monitoring the significant effects of implementing the plan or programme on the environment	
Developing aims and methods for monitoring	To track the environmental effects of the plan or programme to show whether they are as predicted, to help identify adverse effects
Responding to adverse effects	To prepare for appropriate responses where adverse effects are identified



This page is intentionally left blank

Consultation Response

1.0 Introduction

- 1.1 The historic environment encompasses all aspects of the environment that have resulted from the interaction between people and places over time. This includes all surviving physical evidence of past human activity, whether visible, buried, or submerged, as well as deliberately planted or managed flora. It makes a significant contribution to our sense of place, identity, and local distinctiveness.
- 1.2 This consultation focuses on the draft vision statement, and the proposed 17 policy aims that will form the foundation of a new policy framework for the protection, support, and management of the historic environment.
- 1.3 While many elements of the document set out high-level and aspirational policy objectives that are broadly supported and would not, in themselves, give rise to concern, there is insufficient detail regarding how these objectives will be translated into practice. Greater clarity is needed on the mechanisms for implementation, delivery, monitoring, and resourcing to enable stakeholders to fully assess the likely effectiveness and impact of the proposed policy framework.

2.0 Status and Scope of the Document

- 2.1 Page 3 refers to 17 Policy Aims, indicating that the document is intended to provide a strategic framework rather than a comprehensive policy in itself. This suggests that the substantive detail required to guide decision-making and implementation will be developed through subsequent policies, guidance, or supporting frameworks. Consequently, much of the information necessary to fully assess the practical implications, effectiveness, and potential impacts of the proposals is not currently available within this document.
- 2.2 Furthermore, both the title of the document and the Ministerial Foreword describe the document as a "Policy". Given its apparent strategic and aspirational nature, it would be helpful to clarify its status and purpose, including how it will relate to future policy documents, guidance, action plans, and implementation mechanisms. Greater clarity in this regard would assist stakeholders in understanding the document's role within the wider policy landscape and the extent to which its objectives will influence decision-making.
- 2.3 The proposed policy is intended to cover the period 2027 to 2037 and forms part of the Heritage, Culture, Creativity Programme, which seeks to conserve, protect, and promote cultural heritage and the historic environment. As such, it has the potential to shape strategic priorities and resource allocation over a significant period.
- 2.4 The Ministerial Foreword states that the policy will set out how the historic environment will be identified, protected, managed, and celebrated. However, the document provides limited explanation of how these ambitions will be delivered in practice. In particular, there is insufficient information regarding the specific measures, responsibilities, governance arrangements, funding mechanisms, and monitoring processes that will be required to achieve the stated objectives. Without such detail, it is difficult to assess how the proposed policy aims will translate into meaningful outcomes over the lifetime of the policy.

3.0 Relationship with Existing Planning Policy

Paragraph 6 states:

“We intend that District Councils will use this Policy to direct Local Development and Community Planning for place-making, heritage plans, environmental plans and tourism, and to consider how to use the historic environment to achieve social cohesion and good relations.”

- 3.1 The relationship between the proposed policy and the existing planning policy framework is not clearly explained. In particular, it is unclear how the policy is intended to interact with current departmental guidance and statutory requirements relating to the preparation of Local Development Plans (LDPs). Given that LDPs already operate within an established legislative and policy context, further clarification is required regarding the status of this policy and the extent to which its provisions are expected to influence plan preparation, policy formulation, and decision-making.
- 3.2 The reference to "heritage plans" and "environmental plans" is also unclear. The document does not define these terms or indicate whether they refer to existing strategies and plans, or whether new plans will be required under the proposed policy framework. Greater clarity on the purpose, scope, and status of such plans would assist stakeholders in understanding the policy's intended application and implications.
- 3.3 In addition, the operational consequences for councils are not adequately addressed. The document does not explain whether councils will be expected to review existing LDP policies, prepare supplementary guidance, develop new evidence bases, or allocate additional resources to support implementation of the policy aims. Similarly, there is limited information on how the proposed policy will be applied in the assessment and determination of planning applications, particularly where competing planning considerations arise.
- 3.4 As currently drafted, it is difficult to determine whether the policy is intended primarily as a strategic vision, a material consideration in planning decisions, or a framework that will give rise to more detailed policy and guidance. Greater clarity on its relationship with the existing planning system, including the respective roles of central government and local authorities, would enable stakeholders to better understand its practical implications and assess its likely effectiveness in achieving the stated objectives.

4.0 Funding and Delivery

Paragraph 27 states:

“Responses to this consultation will assist in prioritising funding within the context of the challenges and the potential offered by the historic environment and the greater budgetary context. Work is underway to consider how future funding can support the opportunities that our historic environment presents into the future, support heritage-led regeneration, tackle heritage at risk, address market failure in heritage investment and support town centres, housing and economic development.”

- 4.1 While the document highlights a range of potential funding priorities and acknowledges the important role that the historic environment can play in supporting regeneration, housing, economic development, and town centre revitalisation, it provides limited information regarding how funding decisions will be made in practice.

- 4.2 The consultation document does not explain how funding will be prioritised, allocated, administered, or monitored over the lifetime of the policy. There is no indication of the scale of funding that may be available, the bodies responsible for administering funding programmes, or the criteria that will be used to assess eligibility and determine priorities. Without this information, it is difficult to assess the extent to which the policy aims can realistically be delivered.
- 4.3 Similarly, the document refers to the *NI Heritage Delivers* programme and identifies opportunities to support housing delivery through the reuse of heritage assets and to address decline within town centres. However, little detail is provided regarding the nature of the schemes or interventions that may be brought forward to support these objectives. It is therefore unclear how heritage-led housing projects, regeneration initiatives, or town centre renewal schemes will be identified, funded, and prioritised, particularly where there are competing demands for limited resources.
- 4.4 The consultation document also refers to addressing "market failure" in heritage investment, yet does not define what circumstances would constitute market failure or explain how funding interventions would be targeted to address it. Further clarification would assist stakeholders in understanding the policy's intended approach and the circumstances under which public sector intervention may be considered appropriate.
- 4.5 Paragraph 53 raises similar concerns regarding the relationship between funding and policy delivery. While the document identifies the importance of collaboration and strategic planning, it does not explain how funding mechanisms will support implementation of the policy aims or how financial priorities will align with the strategic planning functions of district councils. In particular, it remains unclear whether councils will be expected to undertake additional responsibilities, prepare supporting strategies, or deliver specific heritage initiatives, and whether additional resources will be made available to support these activities.
- 4.6 Given that the policy is intended to operate over a ten-year period, greater clarity on funding arrangements, delivery mechanisms, governance structures, and implementation responsibilities would assist stakeholders in assessing the achievability of the proposed policy aims. Consideration should also be given to setting out a clear framework for prioritisation, monitoring, and reporting to demonstrate how investment decisions will contribute to the delivery of the policy's objectives and ensure transparency in the allocation of public resources.

5.0 Draft Policy Aims

- 5.1 In relation to the Draft Policy Aims, it is unclear whether these are intended to supplement existing central government policy and guidance, or whether they are intended to replace, amend, or introduce new policy requirements. This distinction is important, as the document's purpose and status will influence how the policy aims are interpreted and applied by public authorities, local councils, developers, heritage bodies, and other stakeholders.
- 5.2 For example, in relation to the identification and protection of historic environments, there is potential for ambiguity regarding the relationship between existing designation processes and the proposed policy objectives. In particular, there may be tension between:

1. Existing central government policy and guidance relating to the identification and designation of Conservation Areas (CAs), Areas of Townscape Character (ATCs), and other recognised heritage assets; and
 2. The apparent intention, reflected in paragraph 42, to recognise locally valued heritage assets and provide greater flexibility for local authorities and communities to identify elements of the historic environment that are considered significant at a local level.
- 5.3 While the recognition of local heritage values may provide opportunities to strengthen community engagement and local distinctiveness, the document does not explain how such an approach would operate alongside established designation processes and existing policy frameworks. Clarification would therefore be beneficial regarding the respective roles of central government, local authorities, and local communities in identifying, recognising, and managing heritage assets.
- 5.4 More generally, a number of the policy aims are expressed as broad aspirations, but the document provides limited information regarding how they will be delivered in practice. As a result, it is difficult to assess their likely effectiveness, resource implications, or relationship with existing policy and regulatory frameworks.
- 5.5 For example, further detail would be welcomed on the following matters:
- How will the policy contribute to the creation and enhancement of distinctive places?
 - What specific policy interventions, planning measures, or funding mechanisms are proposed to achieve this objective?
 - What educational initiatives are envisaged, and how will these be developed, funded, and delivered?
 - What practical actions, programmes, partnerships, or projects will be introduced to support the policy aims?
 - How will success be measured, monitored, and reported throughout the lifetime of the policy?
 - What role will local authorities and other stakeholders be expected to play in the implementation of individual policy aims?
- 5.6 While the consultation document sets out a clear vision for the importance and value of the historic environment, it largely focuses on desired outcomes rather than the mechanisms required to achieve them. Greater clarity regarding implementation arrangements, governance structures, funding, delivery responsibilities, and performance measures would assist stakeholders in understanding how the policy aims are intended to translate into tangible outcomes over the 2027 to 2037 period.

6.0 Heritage Standards and Guidance

Paragraph 34 states:

“We will continue to safeguard our historic environment. However, to realise this aim, action like reviewing and evolving our legislation or designation in line with international conventions is needed. Any changes we make will accord with our own Conservation Principles. The Listed Building and Scheduled Monument Owners’ Surveys suggest that building owners agree with this ethos.”

- 6.1 While the proposed commitment to align heritage protection measures with international conventions and recognised conservation principles is welcomed, the document provides limited detail regarding how international heritage standards and guidance will be interpreted and applied within the proposed policy framework.
- 6.2 International heritage charters and guidance documents often establish broad principles rather than prescriptive rules and can be subject to differing interpretations depending on the context in which they are applied. In some cases, different heritage frameworks may place emphasis on different objectives, resulting in potential tensions when balancing conservation, adaptation, regeneration, sustainability, and community interests.
- 6.3 For example, UNESCO's *Historic Urban Landscape (HUL)* Recommendation promotes an integrated and landscape-based approach to managing historic urban areas, recognising the need to accommodate change while conserving heritage significance. By contrast, the ICOMOS *Burra Charter* places particular emphasis on understanding and conserving the cultural significance of heritage places and ensuring that any change is carefully managed so as not to diminish that significance. While these approaches are not necessarily incompatible, their practical application can lead to different conclusions regarding the extent and nature of acceptable change.
- 6.4 In this context, it would be beneficial for the policy to clarify:
- Which international conventions, charters, and guidance documents are intended to inform future policy development and decision-making;
 - The status that such documents will have within the policy framework;
 - How any differences in interpretation between international heritage standards will be reconciled;
 - The relationship between international guidance, national conservation principles, and existing planning and heritage legislation; and
 - How these principles will be applied in practice when assessing proposals involving change to heritage assets and historic areas.
- 6.5 The reference to reviewing and evolving legislation and designation processes is also significant. However, the document does not indicate whether substantive changes to existing heritage protection mechanisms are envisaged, nor does it explain how stakeholders will be involved in shaping any such reforms. Further information on the scope of any proposed legislative, policy, or designation changes would therefore assist consultees in understanding the potential implications of the policy.
- 6.6 Overall, while the policy's commitment to learning from international best practice is supported, greater clarity is required regarding how international heritage standards will inform decision-making and how they will be integrated with existing legislative and policy frameworks. This would provide greater certainty for local authorities, communities, developers, heritage organisations, and property owners who may be affected by future policy decisions.

7.0 Information and Accessibility

Paragraph 37 states:

“In a future where the historic environment is key to our way of life, we will promote a better understanding of protection along with better access to information, advice and support to help people make optimal use of their heritage assets.”

- 7.1 While the objective of improving access to information, advice, and support is welcomed, the document provides limited detail regarding how this will be achieved in practice. As currently drafted, it is unclear what specific initiatives, services, or investment programmes are envisaged to support improved public access to heritage information and guidance.
- 7.2 In particular, the document does not explain whether improved access will be delivered through enhanced digital platforms, expanded advisory services, improved public records, educational resources, or other forms of engagement. Nor does it identify the organisations that will be responsible for delivery, the resources that will be required, or how success will be measured over the lifetime of the policy.

Similarly, paragraph 43 states:

“Not everyone can access historic places, but it is relevant to us all. And so, a fully documented and cared for historic environment should deliver rewards equally for people from all walks of life. Contemporary presentation and interpretation of heritage could include the better use of technology, bringing heritage to new audiences.”

- 7.3 This aspiration is supported in principle. However, the document provides little information regarding the practical measures that are intended to improve accessibility, participation, and public engagement.
- 7.4 For example, it is unclear whether the proposed use of technology could include:
- Increased digitisation of historic environment records and archives;
 - Expanded online access to information relating to listed buildings, scheduled monuments, conservation areas, and other heritage assets;
 - The use of 3D scanning, digital modelling, virtual reality, or augmented reality technologies to improve accessibility and interpretation;
 - Digital mapping and interactive heritage platforms;
 - Improved public access to heritage data and research;
 - Educational resources and digital learning tools aimed at schools, community groups, and wider audiences.
- 7.5 While these measures may offer significant opportunities to widen access and engagement, the consultation document does not indicate the scale of ambition, the intended priorities, or the resources that may be available to support such initiatives. It is therefore difficult for consultees to assess the practical implications of the proposal or the extent to which it may improve public understanding and appreciation of the historic environment.
- 7.6 More broadly, the document would benefit from greater clarity regarding what is meant by "accessibility" in this context. Accessibility may encompass not only physical access to heritage sites, but also digital access to information, inclusive interpretation, educational engagement, and the removal of barriers that may prevent individuals or communities from participating in or benefiting from heritage initiatives.

Clarification of these objectives would assist stakeholders in understanding the intended outcomes of the policy and how progress towards these aims will be measured.

- 7.7 Overall, while the aspiration to improve access to information and broaden participation in the historic environment is welcomed, further detail is required regarding the technologies, programmes, partnerships, and investment that will be used to deliver these objectives. This would enable stakeholders to better understand the scope, ambition, and likely effectiveness of the proposed measures.

8.0 Conclusion

- 8.1 Overall, the aspirations and objectives set out within the draft policy are broadly supported. The historic environment plays an important role in shaping place, identity, community cohesion, regeneration, and economic development, and the proposed policy rightly recognises its significance within these wider social, cultural, and environmental contexts.
- 8.2 However, the consultation document currently presents a high-level vision, and a series of broad policy aims without providing sufficient detail regarding how these objectives will be implemented in practice. There is a lack of clarity concerning governance arrangements, delivery mechanisms, funding structures, monitoring and performance frameworks, and the respective roles of central government, local authorities, heritage organisations, and other stakeholders.
- 8.3 The relationship between the proposed policy and existing planning policy and guidance also requires further explanation. Greater clarity is needed regarding how the policy will interact with Local Development Plans, community planning processes, heritage designations, and development management functions, and whether any new responsibilities or statutory requirements will arise for district councils and other public bodies.
- 8.4 Similarly, while the document references future funding opportunities, heritage-led regeneration, town centre renewal, housing delivery, educational initiatives, improved accessibility, and the use of technology, limited information is provided regarding the practical measures, programmes, resources, and partnerships that will be required to deliver these ambitions. Without such detail, it is difficult for consultees to assess the likely effectiveness, affordability, and long-term deliverability of the proposed policy framework.
- 8.5 The document would therefore benefit from further information on implementation arrangements, funding criteria, accountability structures, performance indicators, and the relationship between the draft policy aims and any future guidance, action plans, or legislative changes. Providing this information would enable stakeholders to more fully understand the practical implications of the policy and make a more informed assessment of its potential impacts over the proposed 2027 to 2037 period.
- 8.6 Finally, I do not consider that the consultation questionnaire provided by the Department adequately facilitates detailed responses on many of the matters outlined above. The structure of the questionnaire tends to focus on broad agreement or disagreement with policy aims rather than allowing respondents to comment comprehensively on issues of implementation, governance, funding, policy interaction, and practical delivery. A more open-ended consultation format, or the

inclusion of additional opportunities for narrative responses, would have enabled a fuller and more meaningful examination of these important issues.



Subject:	Tree Protection Bill – Call for Evidence.
Date:	15 September 2026
Reporting Officer:	Dermot O’Kane – Acting Development Planning & Policy Manager
Contact Officer:	Garry Thornton, Senior Planning Officer

Is this report restricted?	Yes	☐	No	☒
Is the decision eligible for Call-in?	Yes	☒	No	☐

1.0	Purpose of Report or Summary of Main Issues
1.1	The purpose of this report is to seek the Planning Committee's approval of Belfast City Council's response to the Northern Ireland Assembly's Tree Protection Bill – Call for Evidence.
2.0	Recommendations
	The Planning Committee is requested to: • Note the contents of the Assembly's consultation document; • Agree the proposed Council response as outlined within this report; and • Authorise officers to submit the response to the Northern Ireland Assembly.
3.0	Background
3.1	The Northern Ireland Assembly has published a consultation on Tree Protection Bill - Call for Evidence - Northern Ireland Assembly - Citizen Space . Which opened on 9 July and is due to close on 16 September 2026.
3.2	The Tree Protection Bill sets out to: • Amend and strengthen primary legislation to provide enhanced legal protection for Northern Ireland's oldest and most significant trees and woodlands. • Reform the Tree Preservation Order (TPO) system to align with practice in England, Scotland, and Wales—closing loopholes, ensuring consistent enforcement across local authorities, and broadening designation criteria to reflect the full environmental, social, and health benefits of trees. • Ensure legislative protections reflect the modern understanding of the role trees play in climate resilience and public health. • Protect ancient and long-established woodland by introducing enforceable safeguards against development, recognising these habitats as irreplaceable.
3.3	The consultation document identifies a series of clauses which deal with Tree Preservation Orders, the replacement of trees, tree protection mapping, ancient woodlands and Ecosystem Services.

4.0	Main Issues
4.1	The Bill argues that Northern Ireland's current tree protection framework is weaker than elsewhere in the UK and is failing to adequately protect important trees and woodlands. Key concerns include: • Enforcement of Tree Preservation Orders (TPOs). • Continued loss of ancient and long-established woodland to development. • Lack of specific legal protection for ancient trees. • Poor monitoring and replacement of illegally felled protected trees. • Limited public access to information about protected trees. • Inconsistent implementation of tree protection measures across councils.
4.2	Enforcement of Tree Preservation Orders A central criticism is that Northern Ireland's legislation does not clearly make it an offence to "cause or permit" a breach of a TPO, unlike legislation in England, Scotland and Wales. This can make prosecutions more difficult and creates loopholes for landowners, contractors, or others indirectly responsible for damage.
4.3	Insufficient Protection for Ancient Woodland Ancient and long-established woodland is identified as one of Northern Ireland's rarest habitats, but current planning and forestry controls do not adequately prevent its destruction through development.
4.4	Lack of Dedicated Protection for Ancient Trees The Bill argues that while historic buildings receive statutory protection, there is no equivalent protection for ancient trees despite their ecological, cultural and climate value. It proposes a specific protection mechanism for ancient trees and would require councils to make TPOs for qualifying ancient trees unless they are dead.
4.5	Tree Replacement and Accountability The Bill identifies shortcomings in current replacement requirements when protected trees are unlawfully removed. It seeks to require larger replacement trees and impose replacement obligations on those responsible for the breach. It would also require replacement trees to survive for five years and allow recovery of costs from those responsible for the damage.
4.6	Lack of Monitoring and Transparency The Bill highlights the absence of a comprehensive, publicly accessible record of TPOs. It proposes a Northern Ireland-wide digital Tree Protection Map and the publication of all active TPOs and conservation areas. It would also require Councils to report on TPO applications, approvals and refusals.
4.7	Development Pressure on Protected Woodland A major policy proposal is to restrict development affecting ancient or long-established woodland. The Bill would require planning permission to be refused where development would damage ancient woodland. It would also require a 15-metre protection buffer around ancient and long-established woodland and the removal of permitted development rights where such woodland would be affected, except in wholly exceptional circumstances.
	Potential Concerns and Challenges

4.8	Although the response broadly supports the Bill, it acknowledges several implementation challenges including a financial burden. The Bill would create new responsibilities for councils and the Department for Infrastructure, including the annual inspections of replacement trees, additional enforcement activity, the administration of the new mapping system and arboricultural assessments for ancient trees. Councils may require more specialist tree officers, support from external arboricultural consultants and additional training and administrative support. The proposed 15-metre exclusion zone and stronger planning restrictions may reduce development opportunities on some sites, increase planning complexity and delays and generate appeals and disputes.
4.9	Council Response The principal debate is whether the environmental benefits justify the additional costs, enforcement requirements and potential constraints on development. Overall, the Council supports the Bill's objectives of protecting trees and strengthening enforcement, but raises significant concerns about practicality, resourcing, and the prescriptive nature of several proposals. The Council supports stronger enforcement against unlawful tree damage and felling and the principle of protecting important trees. However the Council has concerns about how some provisions would operate in practice as it is likely that several clauses would impose substantial additional duties on councils without corresponding resources or funding.
4.10	The Council recognises the value of ecosystem services when considering tree protection and already takes these benefits into account in its guidance. However, further regional guidance would be required to clarify what constitutes an ecosystem service and what level of benefit would justify a TPO and how these tests could be applied consistently. The Council supports making it an offence to "knowingly cause or permit" damage to protected trees but notes that the legislation does not clearly explain how this would be evidenced or enforced.
4.11	The Council is unconvinced that changing the current process in relation to the automatic Confirmation of Provisional TPOs in Clause 2 provides any benefit. It believes the existing six-month period already allows sufficient time for site inspections, independent assessment and the consideration of amendments or objections.
4.12	The Council's main concern regarding the proposed requirement for replacement trees is that requiring all replacement trees to be "heavy standard" trees is too prescriptive and may not be appropriate in many circumstances. Different sites may require different replacement approaches. The requirement to monitoring replacement planting for five years would create a significant and unsustainable administrative burden.
4.13	The Council cannot support the proposed inspection duties set out in Clause 5. The requirement for annual inspections of replacement trees would be highly resource-intensive, exceed existing staffing capacity and likely require substantial additional funding and specialist expertise. Furthermore, the Council opposes Clause 6, which relates to enforcement powers and replanting duties. These provisions could require councils to purchase replacement trees, access private land, undertake planting works and recover costs from offenders or landowners. It is likely that these additional responsibilities would create a significant administrative burden for the Council, which currently lacks the capacity and resources to carry out these functions effectively and sustainably.
4.14	The Council already maintains a digital map of Tree Preservation Orders (TPOs) within Belfast, which is a valuable resource for both planning practitioners and the wider public. While the Council would have no objection to a similar provision being implemented across Northern Ireland, it questions whether there is a need for this to be established as

	a statutory requirement. A regional mapping system may offer benefits in terms of consistency and accessibility, but the rationale for placing such a duty in legislation has not been clearly demonstrated.
4.15	Clauses 8 and 9 introduce new restrictions on development affecting ancient and long-established woodland. The Council considers these proposals to be overly prescriptive and is concerned that the proposed 15-metre buffer zone is arbitrary and does not adequately reflect the varying circumstances of individual sites. It is the Council's view that the existing planning system already requires the impacts of development on trees and woodland to be carefully assessed as part of the determination process. Greater flexibility should therefore be afforded to planning authorities to assess proposals on a case-by-case basis, taking account of site-specific characteristics, material planning considerations and professional judgement in accordance with established planning practice.
4.16	While the draft response broadly supports the objective of strengthening tree protection, it raises concerns that several provisions would place significant new obligations on councils without adequate funding, staffing or operational guidance. In particular, the Council considers that the proposed inspection, enforcement and replacement duties would create substantial resource and administrative pressures that are not currently matched by existing capacity. The most significant concerns relate to the long-term monitoring of replacement trees, the exercise of enforcement powers, and the practical implications of undertaking replanting works and cost recovery processes.
4.17	The Council also has reservations regarding the proposed planning restrictions affecting development near ancient and long-established woodland, which it considers to be overly prescriptive and insufficiently flexible to account for site-specific circumstances. Overall, while supportive of measures that improve the protection of trees and woodland, the Council's position is that a number of the Bill's provisions, in their current form, may prove impractical and unsustainable to implement without additional resources, clearer guidance and greater flexibility for local planning authorities. <u>Finance and Resource Implications</u> There are no resource implications associated with this report. <u>Asset and Other Implications</u> None noted. <u>Equality or Good Relations Implications</u> There are no relevant equality or good relations implications attached to this report.
5.0	Appendices
	Appendix 1 – Tree Protection Bill (as introduced) Appendix 2 – Explanatory and Financial Memorandum Appendix 3 – Draft Council Response

Tree Protection Bill

[AS INTRODUCED]

LEGISLATIVE COMPETENCE

At Introduction the Member in charge of the Bill, Mr Peter McReynolds, had made the following statement under Standing Order 30:

“In my view the Tree Protection Bill would be within the legislative competence of the Northern Ireland Assembly.”

Tree Protection Bill

[AS INTRODUCED]

CONTENTS

PART 1

TREE PRESERVATION ORDERS

Tree Preservation Orders

1. Tree preservation orders: councils
2. Provisional tree preservation orders
3. Penalties for contravention of tree preservation orders

Replacement of trees

4. Replacement of trees
5. Council to inspect replacement trees
6. Enforcement of duties as to replacement of trees

Tree Protection Map

7. Tree Protection Map

Long-established and ancient woodland

8. Determination of planning applications
9. Permitted Development

Ecosystem services

10. Ecosystem services

Interpretation

11. Interpretation: 2011 Act
12. Interpretation: 2015 Order

PART 2

SUPPLEMENTARY PROVISIONS

13. Interpretation: general
14. Commencement
15. Short title

A

BILL

TO

Amend the law relating to the protection of trees and woodlands.

BE IT ENACTED by being passed by the Northern Ireland Assembly and assented to by His Majesty as follows:

PART 1

TREE PRESERVATION ORDERS

Tree Preservation Orders

Tree preservation orders: councils

5 **1.**—(1) Section 122 (Tree preservation orders: councils) of the 2011 Act is amended as follows.

(2) In subsection (1) after “amenity” insert “or ecosystem services”.

10 (3) In subsection (1)(a) after “destruction of trees” insert “; or for prohibiting the causing or permitting of the cutting down, topping, lopping, uprooting, wilful damage or wilful destruction of trees,”.

(4) After subsection (1) insert—

15 “(1A) Notwithstanding the requirement under subsection (1) that the making of a tree preservation order appears to a council to be expedient in the interests of amenity or ecosystem services, a council may make a tree preservation order in respect of any tree which is an ancient tree.

20 (1B) Where a council has reason to believe that a tree may be an ancient tree, and the tree has not been confirmed to be an ancient tree by a suitably qualified arboriculturist, the council may, before determining whether to make a tree preservation order in respect of that tree, commission an assessment by a suitably qualified arboriculturist to determine whether the tree is an ancient tree.

(1C) Where, following such an assessment, the arboriculturist determines that the tree is an ancient tree, the council must make a tree preservation order in respect of that tree unless the arboriculturist has confirmed that the tree is dead. Other than if the tree is dead, the condition, health or structural integrity of that tree is not to be considered a ground for refusing to make a tree preservation order.

(1D) Where a council decides not to commission an assessment under subsection (1B), it must provide written reasons for that decision to any person who requested the assessment or who brought the potential ancient status of the tree to the attention of the council.”.

(5) In subsection (3) for “A tree preservation order shall not take effect until it is confirmed by the council and the council may confirm any such” substitute “The council may confirm a tree preservation”.

(6) After subsection (3) insert—

“(3A) A tree preservation order shall take effect on the earlier of the date on which the order is confirmed by the council or the date on which it is deemed to have been confirmed in accordance with subsection 123(2)(b)(ii).”.

(7) After subsection (5) insert—

“(6) In this section, “ecosystem services” means the direct and indirect contributions of ecosystems to human well-being as listed in Schedule 1A.”.

Provisional tree preservation orders

2.—(1) Section 123 (Provisional tree preservation orders) of the 2011 Act is amended as follows.

(2) In subsection (2)(b)(i) after “made” insert “at which time the order will be deemed to have been confirmed, provided that no objections or representations have been received by the council and the council has not issued a decision to revoke the provisional tree preservation order”.

Penalties for contravention of tree preservation orders

3.—(1) Section 126 (Penalties for contravention of tree preservation orders) of the 2011 Act is amended as follows.

(2) In subsection (1) after “destroy it” insert “or knowingly causes or permits a tree to be cut down, uprooted or wilfully destroyed, or wilfully damaged, topped or lopped in such a manner as to be likely to destroy it,”.

Replacement of trees

Replacement of trees

4.—(1) Section 125 (Replacement of trees) of the 2011 Act is amended as follows.

(2) In subsection (1) for “another tree of an appropriate size and species” substitute “a heavy standard tree of an appropriate species”.

(3) In subsection (1) after “can” insert “and to inform the council that such a tree has been planted”.

(4) After subsection (3) insert—

5 “(3A) If any tree planted pursuant to this section dies or becomes damaged, diseased or is removed within 5 years of planting, it shall be the duty of the owner of the land to plant a subsequent replacement tree and the provisions of this section shall apply to any tree planted pursuant to this subsection.

10 (3B) If the owner is not responsible for the breach of the tree preservation order, the replacement and other duties set out in subsections (1) and (3A) are instead imposed on the person responsible for the breach. The owner may elect to replace the tree, and if the person responsible for the breach has failed to replace the tree within 18 months of being notified of the duty by the council or the owner, the owner of the land must replace the tree.
15 If the owner of the land replaces the tree pursuant to this subsection (3B), the owner may recover the reasonable costs of replacement from the person responsible for the breach.”.

Council to inspect replacement trees

5.—(1) After Section 125 (Replacement of trees) insert—

20 **“Council to inspect replacement trees**

125A.—(1) A council must annually inspect, for a period of 5 years from the date of planting, the condition of any tree that is planted in its district pursuant to section 125 with a view to—

- 25 (a) identifying any tree that needs additional care or replacement; and
 (b) informing the owner of the land of any action that they need to take to ensure that the tree becomes established.

30 (2) It is for the council to determine the form of the inspection under subsection (1)(a), and an inspection may be limited to the examination of evidence of the tree’s establishment, or may include a scheduled or unscheduled site visit.

 (3) Where the council requests the owner of the land to provide evidence of the establishment of the tree, the owner must provide the evidence in such form and within such reasonable period as the council may specify.

35 (4) Where remedial action is required pursuant to subsection (1)(a), the council must inform both the owner of the land and, if known, the person responsible for the breach of the remedial action required and may specify a reasonable period during which the action is to be carried out.

40 (5) Unless the owner of the land elects to carry out the remedial action, the person responsible for the breach must carry out the remedial action within the period specified or, if no period is specified, as soon as that person reasonably can.

(6) If the person who committed the breach has not taken the required remedial action within the period specified under subsection (4), the owner of the land must carry out the action as soon as the owner reasonably can.

5 (7) If the owner of the land carries out the remedial action pursuant to section 125A, the owner may recover the reasonable costs of such action from the person responsible for the breach.”.

Enforcement of duties as to replacement of trees

6.—(1) Section 164 (Enforcement of duties as to replacement of trees) of the 2011 Act is amended as follows.

10 (2) In subsection (1) after “plant a” insert “heavy standard”.

(3) After subsection (5) insert—

“ (6) Where a person fails to comply with an enforcement notice under this section, the council may enter the land, carry out the planting, and recover the costs of doing so from the person who committed the breach.

15 (7) Where the person who committed the breach cannot be identified, is insolvent or cannot be found, the council may recover costs from the owner of the land.

(8) Where the owner of the land incurs costs by reason of subsection (7), the owner has a right of action against the person who committed the breach to recover these costs.”.

20

Tree Protection Map

Tree Protection Map

7. After section 128 (Power to disapply section 127) insert—

“Tree Protection Map

25 **128A.**—(1) The Department must make available online free of charge a digital map of tree preservation orders that are in effect in Northern Ireland.

(2) This map will show the boundaries of all conservation areas in Northern Ireland and the number of tree preservation orders received, approved, and rejected by each council.

30 (3) This map is to be known as the Tree Protection Map (and is referred to in this Act as “TPM”).

Upload of information into the Tree Protection Map

128B.—(1) Before the end of the initial upload period each council must enter into TPM—

35 (a) all information that is included in the council’s records under section 242(1)(l) on the archive upload date;

(b) conservation area boundary information for all conservation areas within its district; and

(c) the number of tree preservation order applications received, approved, and rejected by the council per year over the previous 5 years.

(2) Information must be entered into TPM under subsection (1) in such form and manner as may be prescribed.

5 (3) Following the end of the initial upload period under subsection (1), the council must at least once in every 3 month period, upload to TPM any new information and update any existing information that is included in the council's records in respect of the information uploaded under subsection (1) to ensure that the information held in TPM is accurate and current.

10 (4) For the purposes of this section, the Department must by regulations—

(a) specify a date as “the archive upload date”, and

(b) specify a period beginning with that date as the “initial upload period”.

15 (5) Regulations under this section are subject to the negative resolution procedure.

Access to information kept in the Tree Protection Map

128C.—(1) The Department may by regulations make provision for or in connection with making information kept in TPM available.

(2) The regulations may (among other things) make provision about—

20 (a) which information, or descriptions of information, may be made available; and

(b) the form and manner in which information may be made available.

25 (3) The Department must ensure that any person required by a provision of this Act to upload data to TPM is granted suitable access to TPM for that purpose.

(4) Except as otherwise prescribed and subject to section 128D, processing of information by the Department in exercise of functions conferred by or under section 128A or this section does not breach—

(a) an obligation of confidence owed by the Department, or

30 (b) any other restriction on the processing of information (however imposed).

(5) Regulations under this section are subject to the draft affirmative procedure.

Data protection

35 **128D.**—(1) A duty or power to process information that is imposed or conferred by or under sections 128A, 128B or 128C does not operate to require or authorise the processing of personal data that would contravene the data protection legislation (but in determining whether processing of personal data would do so, that duty or power is to be taken into account).

40 (2) In this section—

“the data protection legislation” has the same meaning as in the Data Protection Act 2018 (see section 3(9) of that Act);

“personal data” has the same meaning as in that Act (see section 3(2) of that Act).”.

Long-established and ancient woodland

Determination of planning applications

5 **8.**—(1) Section 45 (Determination of planning applications) of the 2011 Act is amended as follows.

(2) After subsection (1) insert—

“(1A) Where an application is made for planning permission, and the grant of that planning permission would result in—

- 10 (a) the loss or deterioration of ancient or long-established woodland;
 (b) development within 15 metres of ancient or long-established woodland; or
 (c) the deterioration of an ancient tree that is subject to a tree preservation order,

15 the council or, as the case may be, the Department, must refuse planning permission unless the applicant demonstrates that there are wholly exceptional circumstances justifying the grant of planning permission.”.

Permitted Development

20 **9.**—(1) Article 3 (Permitted Development) of the 2015 Order is amended as follows.

(2) After paragraph (5) insert—

“ (5A) The permission granted by the Schedule shall not authorise any development which requires or involves—

- 25 (a) the loss or deterioration of ancient or long-established woodland; or
 (b) (b) development within 15 metres of ancient or long-established woodland.”.

Ecosystem services

Ecosystem services

10.—(1) After Schedule 1 to the 2011 Act insert—

“SCHEDULE 1A

Section 122.

ECOSYSTEM SERVICES

5 1.—(1) The following services are ecosystem services for the purposes
of section 122.

 (2) Cultural Services, including—

 (a) Recreation and tourism;

 (b) Sense of place; and

 (c) Health benefits.

10 (3) Regulating services, including—

 (a) Climate regulation;

 (b) Flood regulation;

 (c) Fire hazard regulation;

 (d) Air and water quality regulation;

15 (e) Erosion control;

 (f) Disease and pest control;

 (g) Soil quality regulation; and

 (h) Noise regulation.

 (4) Supporting services, including—

20 (a) Primary production;

 (b) Soil formation;

 (c) Water cycling; and

 (d) Nutrient cycling.”.

Interpretation

25 **Interpretation: 2011 Act**

11.—(1) In Part 15 (Supplementary), section 250(1), insert the following
definitions in their appropriate places—

30 ““ancient tree” means a tree that meets the criteria for ancient trees
published by the Ancient Tree Forum and the Woodland Trust (or
any successor body to either), or such other criteria as the Department
may by regulations prescribe;

 “ancient woodland” means an area that has been continuously wooded
since at least the end of the year 1600 AD, including ancient
semi-natural woodland and plantations on ancient woodland sites;

35 “heavy standard tree” means a tree that meets the heavy standard
specification set out in British Standard 8545:2014 (Trees: from
nursery to independence in the landscape), or any British Standard
which from time to time replaces, supersedes or is equivalent to that

standard, or meets such other specification or standard as the Department may by regulations prescribe;

“long-established woodland” means an area that has been shown to be continuously wooded since the First Edition six-inch to the mile Ordnance Survey Maps of 1830-1844 were published, but for which no documentary evidence has been found that it was wooded prior to 1600;”.

Interpretation: 2015 Order

12. In Article 2 (Interpretation) of the 2015 Order insert the following definitions in their appropriate places—

““ancient woodland” means an area that has been continuously wooded since at least the end of the year 1600 AD, including ancient semi-natural woodland and plantations on ancient woodland sites;

“long-established woodland” means an area that has been shown to be continuously wooded since the First Edition six-inch to the mile Ordnance Survey Maps of 1830-1844 were published, but for which no documentary evidence has been found that it was wooded prior to 1600;”.

PART 2

SUPPLEMENTARY PROVISIONS

Interpretation: general

13. In this Act—

“the 2011 Act” means the Planning Act (Northern Ireland) 2011; and any reference to a Part, numbered Section, or Schedule, is a reference to that Part, Section of, or Schedule to, the 2011 Act (unless otherwise stated); and

“the 2015 Order” means the Planning (General Permitted Development) Order (Northern Ireland) 2015.

Commencement

14. This Act comes into operation twelve months after the day on which this Act receives Royal Assent.

Short title

15. This Act may be cited as the Tree Protection (Northern Ireland) Act 2026.

Tree Protection Bill

[AS INTRODUCED]

A Bill to amend the law relating to the protection of trees and woodlands.

Introduced by: Mr Peter McReynolds

On: 29 June 2026

Bill Type: Non-Executive Bill

ACCOMPANYING DOCUMENTS

**An Explanatory and Financial Memorandum is printed separately as
NIA Bill 41/22-27 EFM.**



Northern Ireland
Assembly

Published by the Northern Ireland Assembly under the Open Northern
Ireland Assembly Licence (<http://data.niassembly.gov.uk/licence.aspx>)

The information contained in this document is available online
www.niassembly.gov.uk

For more information please contact:

Northern Ireland Assembly
Parliament Buildings
Ballymiscaw
Stormont
Belfast BT4 3XX

Telephone: 028 90 521137

Textphone: 028 90 521209

E-mail: info@niassembly.gov.uk

TREE PROTECTION BILL

EXPLANATORY AND FINANCIAL MEMORANDUM

INTRODUCTION

1. This Explanatory and Financial Memorandum has been prepared by Peter McReynolds MLA (the Bill Sponsor) in order to assist the reader of the Bill and to help inform debate on it. It does not form part of the Bill and has not been endorsed by the Assembly.
2. The Memorandum needs to be read in conjunction with the Bill. It is not, and is not meant to be, a comprehensive description of the Bill. So, where a clause or part of a clause does not seem to require an explanation or comment, none is given.

BACKGROUND AND POLICY OBJECTIVES

3. The Bill seeks to amend and strengthen primary legislation to provide greater legal protection for Northern Ireland's oldest and most significant trees and woods.
4. Northern Ireland has the lowest levels of tree and woodland cover in the UK and Ireland, and the least amount of ancient and long-established woodland.¹ While efforts have been made by central and local government to increase tree planting, there is currently insufficient protection for Northern Ireland's existing trees and woods, particularly ancient and long-established woodland, which are irreplaceable habitats under threat from development.
5. A 2023 YouGov survey commissioned by the Woodland Trust found 45% of respondents would feel sad, and 36% would feel angry, if a large local tree was felled for development, while 82% found it unacceptable to build new infrastructure that damages or destroys ancient woodland.² The Woodland Trust's Living Legends campaign, which called for legally protected heritage status for significant trees and stronger policy protection, received over 100,000 signatures, demonstrating clear public demand for stronger legal protections.³
6. Currently, there are three legal mechanisms for tree protection in Northern Ireland: Tree Preservation Orders (TPOs), conservation areas and planning conditions. However,

¹ Forest Research, Forest Statistics 2024, available at:
https://cdn.forestresearch.gov.uk/2024/10/Ch1_Woodland-WA-amendment.pdf

Government of Ireland, Ireland's National Forest Inventory 2022, available at:
<https://www.gov.ie/en/department-of-agriculture-food-and-the-marine/publications/irelands-national-forest-inventory-nfi/>

Woodland Trust, State of the UK's Woods and Trees 2025, available at:
<https://www.woodlandtrust.org.uk/publications/2025/06/state-of-uk-woods-and-trees-2025/>

² YouGov, Woodland Trust Survey Results. Available at:
https://d3nkl3psvxxpe9.cloudfront.net/documents/WoodlandTrust_AncientTrees_230516_NI_W.pdf

³ Woodland Trust, Living Legends Campaign, available at: [Protect Trees](#)

TPOs are limited in effectiveness because primary Northern Irish legislation does not make it an offence to ‘cause or permit’ a breach of a TPO, unlike in England, Scotland and Wales, creating enforcement challenges and loopholes that can be exploited.

7. Ancient and long-established woodland, one of Northern Ireland’s rarest habitats, lacks robust legal protection from its primary threat – loss to development. While felling licences regulate tree felling, they do not prevent the clearance of these habitats for development.
8. The 2023 Northern Ireland Public Services Ombudsman (NIPSO) report has highlighted failings in the delivery of tree preservation orders across Northern Ireland.⁴ The report’s recommendations, even if fully implemented, would not prevent the loss of ancient and long-established woodland to development, nor would they extend legal protection to ancient trees or strengthen the TPO system to recognise the broader environmental, cultural and health benefits provided by trees and is the basis upon which these proposals are made.
9. In England, Scotland and Wales, it is an offence to ‘cause or permit’ a breach of a TPO. The Town and Country Planning Act 1990 (England and Wales) and the Town and Country Planning (Scotland) Act 1997 make it an offence not only to directly breach a TPO but also to ‘cause or permit’ a breach. This wording extends liability to landowners, contractors, and others who indirectly enable a breach, aiding enforcement and acting as a deterrent.
10. The NIPSO report highlights that during the three-year period between 2019 and 2021, out of 369 tree protection breaches reported to councils, only one resulted in formal enforcement action being taken and no cases were brought to court. This contrasts with numerous documented cases in England and Wales where breaches of TPOs have been successfully prosecuted in the courts.
11. There is no direct reference to ‘cause or permit’ within the primary legislation which governs TPOs in Northern Ireland, although it does sit within the schedule of the Planning (Trees) Regulations (Northern Ireland) 2015. The omission of this phrase in the Planning Act (Northern Ireland) 2011 causes uncertainty as to the likelihood of a successful conviction when a TPO has been breached.
12. It is necessary to amend primary legislation to bring Northern Ireland’s TPO system in line with England, Scotland and Wales, closing existing loopholes and ensuring consistent enforcement across local authorities. Legislative change is also needed to broaden the criteria for making a TPO to reflect the full benefits of trees, aligning protections with the contemporary understanding of the role trees play in climate resilience and public health.
13. In addition to causing or permitting destruction, another policy objective of the Bill is to fasten responsibilities to plant replacement trees on landowners or those felling

⁴ Northern Ireland Public Service Ombudsman, 2023. Available at: [NIPSO Overview Report - Strengthening Our Roots - Tree Protection in the Planning System.pdf](#)

protected trees and to place duties on the Council to inspect and confirm replacement trees are of the appropriate condition and are maintained.

14. The Bill aims to protect ancient and long-established woodland to secure enforceable protection for these irreplaceable habitats against development pressure. Alternative approaches, including policy guidance or non-statutory measures, cannot address the current legislative gaps or provide the deterrent effect required to protect Northern Ireland's oldest and most significant trees and woodlands effectively. The proposed exclusion zone of 15 metres in clauses 8 and 9 where no development will be permitted (save in wholly exceptional circumstances) in clause 8, is intended to be proportionate by not unduly blocking legitimate development whilst ensuring there is concrete legislative provision to protect woodlands and ancient trees.
15. Alternative measures, including policy protections and planning guidance, have been insufficient to prevent loss, with around 13% of Northern Ireland's ancient and long-established woodland that survived to the 1960s since been lost, with 273 woods cleared.⁵ It should be noted that, this evidence provided dates back to 2010, this figure will be higher today.
16. Existing protections, such as TPOs under the Planning Act (Northern Ireland) 2011, are weaker than in other parts of the UK. It is necessary to close this legislative gap to fasten responsibilities on landowners, contractors and others in Northern Ireland. Additionally, while Northern Ireland's oldest buildings benefit from dedicated legal protection, there is no equivalent statutory protection for ancient trees, despite their significant ecological, cultural and climate value.

CONSULTATION

17. A public consultation was carried out between 27 November 2024 and 9 March 2025. A total of 703 responses were received to the online survey, which comprised of 638 individual responses (90.75%) and 65 responses from organisations (9.25%).
18. There was strong support for the proposed legislation in that survey. Only 14.6% of respondents who answered the question think Tree Preservation Orders are effective for protecting trees and groups of trees. 91.0% of respondents support updating the Planning Act (Northern Ireland) 2011 to make it an offence to cause or permit the breach of a Tree Preservation Order. 90.2% support the requirement to plant and maintain a tree if a TPO has been breached. 90.0% agree with the creation of a new heritage tree designation to protect our oldest and most significant trees. 91.2% of respondents supported the proposal to restrict permitted developments from sites with ancient and long-established woodland, legally protected trees and heritage trees. 75.45% agreed that any cost of implementing and enforcing the legislation is acceptable when balanced against its benefits.

⁵ [Woodland Trust, 2010, Back on the Map – An Inventory of Ancient and Long-Established Woodland for Northern Ireland.](#)

19. In addition to the public e-consultation, engagement with key sectoral stakeholders was undertaken. The intention of a survey is to provide testable propositions to inform the process of scrutiny and engagement with those directly involved in the process. Two stakeholder engagement sessions were held on 14 February 2025. The first was specifically for council officials and was attended by Lisburn & Castlereagh, Derry City & Strabane and Ards & North Down Councils. The second session was primarily for the environmental Non-governmental organisation (NGO) sector, however there was representation from Mid Ulster Council, RSPB, Ulster Wildlife, Northern Ireland Environment Link and the Ulster Angling Federation. This discussed the Bill's proposals, the implementation, costs and resources required.
20. The Bill Sponsor spoke with the Tree Officer Forum on 25 October 2024 which was attended by nominated tree officers for all the Councils across Northern Ireland. As a result of this meeting, the Sponsor identified that a specific TPO geared towards ancient trees would be a better way to support older and more significant trees, as a normal TPO would become invalidated by the proportion of those trees that might be diseased or dying, and the safety concerns around that. Additionally, in relation to permitted developments, it was highlighted to me that Class A and C developments were already not permitted if it would involve the removal of trees. Therefore, there is already a precedent set within the existing legislation and would ease the extension of this to include ancient trees and ancient and long-established woodland.
21. The proposals were presented to the Future of UK Treescapes project on 16 November 2024, the Protecting the UK's Tree Heritage Day at the Linnean Society in London on 20 November 2024, and the All-Party Group on Climate Change on 28 February 2025. The Sponsor has also spoken to constituents across Northern Ireland about the proposals, and instances of mature trees at risk of being felled for the progression of a development.
22. Following the consultation process, the Sponsor met with external stakeholders and council planners on an individual basis to discuss further development of the proposals. The Sponsor is conscious that Councils will have new responsibilities under the revised legislation and this engagement is crucial. The Member has also made contact with the Construction Employers Federation to seek their views on the Bill. The construction sector is an important stakeholder in relation to planning legislation and the Bill Sponsor is keen to hear their views.
23. The Bill Sponsor wrote to the Minister for Infrastructure to confirm the Department was not planning to introduce similar legislation to the proposals within this mandate, and on two other occasions to share the initial proposal and the consultation summary of responses.
24. The Minister advised the Department were considering the recommendations of the 2023 NIPSO report, 'Strengthening our Roots', and undertaking a review of the Implementation of the Planning Act (NI) 2011 (RIPA). Following initial correspondence in May 2024, the Minister has not indicated her Department will progress the policy proposals via legislation or other means during this mandate.
25. In July 2024 the previous Minister for Infrastructure advised in correspondence the aspects covering 'Heritage Trees' could come under the remit of the Department for

Agriculture, Environment and Rural Affairs as it was regarding trees. However, the law we are seeking to change is strictly regarding planning legislation which comes under the auspices of the Department of Infrastructure.

26. Opinions from both the Human Rights Commission and the Equality Commission, to confirm there were no initial concerns with the policy objectives of the proposed Bill on human rights or equality legislation. If there are views in this area which become apparent following introduction of the Bill or during its progress, the Sponsor will engage on any points raised.

OPTIONS CONSIDERED

Option One - Do nothing, and continue with the status quo i.e. take no legislative action.

Option Two - Take legislative action to provide greater legal protection for Northern Ireland's oldest and most significant trees and woods.

Only 0.04% of woodland in Northern Ireland is ancient, with tree cover being only 8.6%. To address this, the Bill builds upon research and expertise on how to protect trees from across the UK. 'Cause and permit' need to be refreshed in legislation as case law has been too inconsistently applied under current legislation. The 15m buffer zone is based on precedent set by Natural England and the Forestry Commission, putting it on a statutory basis in Northern Ireland. The NIPSO 'Strengthening our Roots' report recommendations underlines that a single map of TPOs should be made available.

There has been no opposition to date to the Bill as reflected in the consultation. If there are areas for improvement or arguments against what is proposed, the Sponsor will engage constructively on these points.

Implications of not introducing legislation would result in Northern Ireland continuing to have significantly low levels of woodland and leaves significant risk to ancient and long-established woodland.

Following consultation, advice and deliberation, the Bill Sponsor concludes that introducing and enacting primary legislation is the most appropriate and proportionate approach.

OVERVIEW

27. The Bill has 15 Clauses and no Schedules. A commentary on each of the Clauses follows below. However, where a Clause or part of a Clause does not seem to require an explanation or comment, none is given.

COMMENTARY ON CLAUSES

Clause 1 - Tree preservation orders: councils

Clause 1 amends section 122 (Tree preservation orders: councils) of the 2011 Act, which allows a council to make a tree preservation order where it appears expedient in the interests of amenity. Clause 1 extends the grounds for making a TPO to include ecosystem services, defined as the direct and indirect contributions of ecosystems to human well-being (as set out in a new Schedule 1A to the 2011 Act inserted by clause 10).

Clause 1 also amends section 122(1)(a), extending the scope of a TPO by providing that it may prohibit a person from knowingly causing or permitting any of the existing prohibited acts. The existing prohibited acts are the cutting down, topping, lopping, uprooting, wilful damage or wilful destruction of a tree.

Clause 1 inserts new subsections (1A) to (1D) which provide for the protection of ancient trees into section 122. A council may make a TPO in respect of any tree which is an ancient tree without the need to satisfy the amenity or ecosystem services test (new subsection (1A)). Where a council has reason to believe that a tree may be an ancient tree and the tree has not already been confirmed to be an ancient tree by a suitably qualified arboriculturist, the council may commission an assessment by a suitably qualified arboriculturist before determining whether to make a TPO in respect of that tree (new subsection (1B)). If the arboriculturist determines that the tree is an ancient tree, the council must make a TPO in respect of that tree, unless the arboriculturist has confirmed that the tree is dead; the condition, health or structural integrity of the tree is not to be considered a ground for refusing to make an order (new subsection (1C)). Where a council decides not to commission an assessment under subsection (1B), the council must provide written reasons for that decision to any person who requested the assessment or who brought the potential ancient status of the tree to the attention of the council (new subsection (1D)).

Clause 1 further amends section 122(3), which currently provides that a TPO does not take effect until it is confirmed by the council. Clause 1 inserts a new subsection (3A) which provides that a TPO takes effect on the earlier of the date on which the order is confirmed by the council or the date on which it is deemed to have been confirmed in accordance with section 123(2)(b)(ii).

Clause 2 - Provisional tree preservation orders

Clause 2 amends section 123 (Provisional tree preservation orders) of the 2011 Act. Section 123 provides that a provisional TPO takes effect immediately but lapses after six months unless the council confirms it. Clause 2 amends section 123(2)(b)(i) to provide that a provisional TPO will be deemed to have been confirmed after six months where no objections or representations have been received by the council and the council has not issued a decision to revoke the provisional tree preservation order.

Clause 3 - Penalties for contravention of tree preservation orders

Clause 3 amends section 126 (Penalties for contravention of tree preservation orders) of the 2011 Act. Section 126(1) provides that it is an offence for a person to cut down, uproot, wilfully destroy, wilfully damage, top or lop a tree in contravention of a TPO.

Clause 3 amends section 126(1) to provide that a person who "knowingly causes or permits" any of those acts is also guilty of an offence. This is similar to the extension of section 122 (Tree preservation orders: councils) by clause 1.

Clause 4 - Replacement of trees

Clause 4 amends section 125 (Replacement of trees) of the 2011 Act, which currently requires the owner of the land to plant a replacement tree of an appropriate size and species where a tree is removed, uprooted or destroyed in contravention of a TPO.

Clause 4 amends section 125(1) so that a replacement tree must be a "heavy standard tree of an appropriate species" (clause 4(1)). A "heavy standard tree" is defined (by clause 11) by reference to British Standard 8545:2014 or any successor standard. The owner of the land is also required to inform the council when a replacement tree has been planted.

Clause 4 also inserts new subsections (3A) and (3B) into section 125. New subsection (3A) provides that if a replacement tree is planted pursuant to section 125 dies, becomes damaged or diseased, or is removed within 5 years of planting, the owner must plant a subsequent replacement, and the provisions of section 125 apply to any such replacement. New subsection (3B) provides that, where the owner of the land is not responsible for the breach of the TPO, the replacement and other duties under subsections (1) and (3A) are instead imposed on the person responsible for the breach. The owner may elect to replace the tree, and must do so if the person responsible for the breach has failed to replace the tree within 18 months of being notified of the duty by the council or the owner. If the owner replaces the tree pursuant to subsection (3B), the owner may recover the reasonable costs from the person responsible for the breach.

Clause 5 - Council to inspect replacement trees

Clause 5 inserts a new section 125A (Council to inspect replacement trees) into the 2011 Act, placing a duty on councils to monitor replacement trees. For 5 years from the date of planting, a council must carry out an annual inspection of the condition of any tree planted pursuant to section 125 in its district, with a view to (a) identifying any tree that needs additional care or replacement and (b) informing the owner of the land of any action that they need to take to ensure that the tree becomes established (section 125A(1)).

It is for the council to determine the form of the inspection (section 125A(2)). An inspection may be limited to the examination of evidence of the tree's establishment, or may include a scheduled or unscheduled site visit. Where the council requests the owner of the land to provide evidence of the establishment of the tree, the owner must provide the evidence in such form and within such reasonable period as the council may specify (section 125A(3)).

Where remedial action is required, the council must inform both the owner of the land and (if known) the person responsible for the breach of the remedial action required, and may specify

a reasonable period during which the action is to be carried out (section 125A(4)). Unless the owner of the land elects to carry out the remedial action, the person responsible for the breach must do so within the period specified or, if no period is specified, as soon as that person reasonably can (section 125A(5)). If the person who committed the breach has not taken the required remedial action within the period specified, the owner of the land must carry out the action as soon as the owner reasonably can and may recover the reasonable costs of such action from the person responsible for the breach (section 125A(6) and (7)).

Clause 6 - Enforcement of duties as to replacement of trees

Clause 6 amends section 164 (Enforcement of duties as to replacement of trees) of the 2011 Act. Firstly, clause 6 amends section 164(1)(b) so that any enforcement notice served under section 164 requires the planting of a “heavy standard” tree consistent with clause 4 (clause 6(2)).

Secondly, clause 6 inserts new subsections (6) to (8) into section 164 (clause 6(3)). Where a person fails to comply with an enforcement notice, the council may enter the land, carry out the planting, and recover costs of doing so from the person who committed the breach (new subsection (6)). Where that person cannot be identified, is insolvent, or cannot be found, the council may recover costs from the owner of the land (new subsection (7)). The owner of the land has a right of action against the person who committed the breach to recover these costs (new subsection (8)).

Clause 7 - Tree Protection Map

Clause 7 introduces new sections 128A to 128D into the 2011 Act.

New section 128A requires the Department to make available online, free of charge, a digital map ("TPM") showing all tree preservation orders that are in effect in Northern Ireland and the boundaries of all conservation areas in Northern Ireland as well as the number of tree preservation orders received, approved, and rejected by each council.

New section 128B requires each council to enter into the TPM all information included in its records under section 242(1)(l), conservation area boundary information, as well as the number of tree preservation order applications received, approved and rejected, before the end of an "initial upload period" (section 128B(1)). The Department must ensure that anyone required to upload data to the TPM is given suitable access (section 128C(2)).

The initial upload period and the form and manner in which data must be entered are to be prescribed by regulations (section 128B(4) and (2)). Following the initial upload period, councils must at least once in every three month period upload to the TPM any new information and update any existing information (section 128B(3)). Regulations under section 128B are subject to the negative resolution procedure (section 128B(5)).

New section 128C provides that the Department may by regulations make provision for or in connection with making information kept in the TPM available (section 128C(1)). Regulations under section 128C are subject to the draft affirmative resolution procedure (section 128C(5)).

Section 128C(4) provides that, subject to section 128D, processing of information by the Department in exercise of functions under sections 128A or 128C does not breach an obligation of confidence or any other restriction on the processing of information.

New section 128D provides that the duty or power to process information under sections 128A, 128B or 128C does not require or authorise the processing of personal data in contravention of the data protection legislation, as defined by reference to the Data Protection Act 2018.

Clause 8 - Determination of planning applications

Clause 8 amends section 45 (Determination of planning applications) of the 2011 Act by inserting a new subsection (1A) that provides that planning permission must be refused where the grant of planning permission would result in (a) the loss or deterioration of ancient or long-established woodland, (b) development within 15 metres of ancient or long-established woodland, or (c) the deterioration of an ancient tree that is subject to a TPO, unless the applicant demonstrates that there are "wholly exceptional circumstances" justifying the grant of planning permission.

Clause 9 - Permitted Development

Clause 9 amends Article 3 of the 2015 Order to remove permitted development rights for development that would affect ancient or long-established woodland. Permitted development rights will no longer be available where development requires or involves (a) the loss or deterioration of ancient or long-established woodland, or (b) development within 15 metres of such woodland.

Clause 9 amends Article 3 (Permitted development) of the 2015 Order by inserting a new paragraph (5A). The permission granted by the Schedule to the 2015 Order will not authorise any development which requires or involves (a) the loss or deterioration of ancient or long-established woodland, or (b) development within 15 metres of ancient or long-established woodland.

Clause 10 - Ecosystem services

Clause 10 sets out the ecosystem services that may justify making a TPO (see clause 1). A new Schedule 1A lists three categories, namely cultural services, regulating services, and supporting services, and specifies examples of what these categories include.

Clause 11 - Interpretation: 2011 Act

Clause 11 inserts a number of new definitions into section 250(1) of Part 15 (Supplementary) of the 2011 Act. "Ancient tree" is defined by reference to the criteria published by the Ancient Tree Forum and the Woodland Trust (or any successor body), or such other criteria as the Department may prescribe by regulations. "Ancient woodland" is defined as an area that has been continuously wooded since at least the end of the year 1600 AD, including ancient semi-natural woodland and plantations on ancient woodland sites. "Heavy standard tree" is defined as a tree meeting the heavy standard specification in British Standard 8545:2014 (Trees: from nursery to independence in the landscape), or any successor standard, or such other

specification as the Department may prescribe by regulations. "Long-established woodland" is defined as an area shown to have been continuously wooded since the First Edition six-inch to the mile Ordnance Survey Maps of 1830–1844 were published, but for which no documentary evidence has been found that it was wooded prior to 1600.

Clause 12 - Interpretation: 2015 Order

Clause 12 inserts definitions of "ancient woodland" and "long-established woodland" into Article 2 (Interpretation) of the 2015 Order, in the same terms as the definitions inserted into the 2011 Act by clause 11.

Clause 13 - Interpretation: general

Clause 13 provides general interpretive provisions for the Act, defining "the 2011 Act" as the Planning Act (Northern Ireland) 2011 and "the 2015 Order" as the Planning (General Permitted Development) Order (Northern Ireland) 2015, and clarifying that references to Parts, numbered sections, and Schedules are references to the 2011 Act unless otherwise stated.

Clause 14 - Commencement

Clause 14 provides that the Act comes into operation twelve months after the day on which it receives Royal Assent.

FINANCIAL EFFECTS OF THE BILL

28. The Bill will likely have modest, but ongoing implications for the public purse. The scale of such impact would be highly dependent on its implementation, including enforcement.
29. While the Bill intends to both strengthen environmental protection and provide long-term public benefits, it will place additional administrative, staffing and enforcement pressures on public bodies, particularly local councils and the Department for Infrastructure.
30. In the short to medium terms, costs would be expected to arise from establishing new regulatory processes, training staff, handling applications and appeals, monitoring compliance, and taking enforcement action where required. Those costs could vary significantly between councils, depending on, for example, existing capacity, tree cover and development pressures.
31. New and expanded responsibilities on councils and the Department include administering tree protection measures, assessing applications and consent requests, maintaining records, monitoring compliance and undertaking enforcement action where breaches occur. As a result, administrative and staffing costs are likely to be the most immediate and tangible public purse impacts. The Sponsor is keen to engage further on how to deliver the legislation in a proportionate and cost-effective manner.

32. Councils could experience varying levels of financial pressure, depending on factors such as existing tree management capacity, levels of development activity and the number of trees likely to fall under protection. Councils with limited specialist expertise could be required to invest in training, additional staff and/or external arboricultural advice, while those with established systems could be better positioned to absorb costs within existing budgets.
33. There also could be legal and enforcement-related costs, particularly in cases of appeals, disputes over tree removal or prosecution for non-compliance. While it would not be expected such costs would arise uniformly or frequently, they could introduce a degree of financial uncertainty, making overall expenditure for councils difficult to predict with precision.
34. Indirect financial impacts include possible delays or additional administrative burdens within the planning system, which could have knock-on effects for both public bodies and developers. However, many of these impacts would depend on how the Bill is implemented in practice and the extent to which guidance and procedures would be streamlined.
35. Careful implementation, realistic funding assumptions and ongoing monitoring are important to ensure that the Bill's environmental objectives could be achieved without creating disproportionate or unfunded burdens on public services.
36. Overall, any potential financial implications are expected to be modest, as the Bill is building on existing statutory framework and responsibilities for councils. Restraints on development are intended to be modest and necessary to protect the natural heritage and therefore the Bill is carefully constructed with this balance in mind.

HUMAN RIGHTS ISSUES

37. The provisions of the Bill are considered to be compatible with the European Convention on Human Rights and with Article 2(1) of the Windsor Framework.

EQUALITY IMPACT ASSESSMENT

38. An Equality Impact Assessment (EQIA) has not been undertaken. Engagement between the Bill Sponsor and the Equality Commission on the outline proposal did not raise any potential adverse effects. If these emerge, the sponsor will engage to understand any points raised.
39. The Bill Sponsor is satisfied that the Bill will not have an adverse effect on any of the groups identified in section 75 of the Northern Ireland Act 1998.

LEGISLATIVE COMPETENCE

40. At Introduction, Peter McReynolds MLA made the following statement under Standing Order 30:

“In my view the Tree Protection Bill would be within the legislative competence of the Northern Ireland Assembly.”



**Northern Ireland
Assembly**

Published by the Northern Ireland Assembly under the Open Northern
Ireland Assembly Licence (<http://data.niassembly.gov.uk/licence.aspx>)

This information contained in this document is available online
www.niassembly.gov.uk

For more information please contact:

Northern Ireland Assembly
Parliament Buildings
Ballymiscaw
Stormont
Belfast BT4 3XX

Telephone: 028 90 521137
Textphone: 028 90 521209

E-mail: info@niassembly.gov.uk

Clause 1 - TPOs - expansion to powers...

Do you agree with Clause 1 of the Bill?

Unsure.

Please provide information to support your answer here:

The Council already recognises the potential ecosystem services benefits of trees in our published guidance on TPOs. However, as is often the case in planning, there is a question of balance and resources, and it is ultimately the decision of each planning authority whether to pursue a new TPO. Therefore, the Council is of the view that revised regional guidance could be helpful if it clearly sets out how 'ecosystem services' can/should be interpreted in relation to section 122 of the Act, including what level of ecosystem would be considered worth of protection.

The Council would support the intention to make it an offence to knowingly permit any prohibited act, such as cutting, damaging, or destroying a tree. However, it is not clear how, 'knowingly causing or permitting' is to be determined.

The Council also notes that Ancient Trees can currently be protected due to age/rarity.

It is not clear how Clause 1 would change when a TPO takes effect.

Clause 2 - Provisional TPOs...

Now deemed confirmed at 6-month point if no objections...

Agree? Unsure

Currently, process allows sufficient time to consider modifications/independent checks to be carried out.

Do you agree with Clause 2 of the Bill?

Unsure.

Please provide information to support your answer here:

The Council considers that the current process, in which a provisional TPO lasts for 6 months before it must be formally confirmed (or allowed to lapse) provides sufficient time to consider modifications and/or for independent checks to be carried out on site.

The Council is unsure as to the benefits, or value of changing the process to deemed TPOs confirmed at the six-month point if the Council has received no objections or representations and has not issued a decision to revoke the order.

Clause 3 - Penalties for contravention of tree preservation order

Range of conduct that constitutes an offence

Do you agree with Clause 3 of the Bill?

Yes.

Please provide information to support your answer here:

The Council in principle agrees with the amendment to add that anyone who knowingly causes or permits any of the prohibited acts is also guilty of an offence. However, it will need to be made clear how Councils can/should determine this.

Clause 4 – Replacement of trees

Do you agree with Clause 4 of the Bill?

Unsure.

Please provide information to support your answer here:

The mandate that any replacement must be a heavy standard tree of an appropriate species would be considered too prescriptive. Sites vary, and heavy standard replacement may not be appropriate for all sites.

The Council would not have the resources required to monitor and administer a requirement for landowners to notify the Council upon planting and to ensure that any replacement planting is carried out within a five-year period. The significant additional workload that these obligations would create would not be feasible for the Council to manage and would be unsustainable in the long term.

Clause 5 – Council to inspect replacement trees

Do you agree with Clause 5 of the Bill?

No.

Please provide information to support your answer here:

This new duty is too onerous on Councils and, if enacted, would require significant additional funding and staffing. The Council does not have the number of staff with the required level expertise needed to undertake annual inspections to identify trees needing extra care or further replacement.

Clause 6 – enforcement of duties as to replacement of trees

Do you agree with Clause 6 of the Bill?

No.

Please provide information to support your answer here:

As with Clause 5, this proposed amendment would place an excessive burden on councils. Belfast City Council does not have the resources required to purchase replacement trees, access sites, and undertake replanting works. In addition, the Council lacks the capacity to administer and recover costs from either the individual responsible or the landowner. To exercise these new enforcement powers in a meaningful and effective way, the Council would require significant additional funding and resources. Without such support, the implementation of these powers would not be feasible or sustainable.

Clause 7

Unsure

We currently have our own map showing updated TPOs etc. Not sure of benefits of further mapping.

Do you agree with Clause 7 of the Bill?

Unsure.

Please provide information to support your answer here:

Belfast CC currently has an online map showing all TPOs in the Council area that is updated on a regular basis. The Council is not sure of the benefits of further mapping.

Clause 8 – Determination of planning applications

Do you agree with Clause 8 of the Bill?

No.

Please provide information to support your answer here:

The Council feels that this new section would potentially be too onerous and prescriptive. The Council believes that considerations of Clause 8 are already a consideration of any planning application currently. The 15m limit is also considered too arbitrary.

If this Clause is to be carried forward, the text should be amended from ‘...requiring Councils’, to, ‘...allowing Councils...’.

The Clause should also provide a definition of deterioration and provide guidance on how to link that to development proposals.

Clause 9

But, as with Clause 8, could be deemed arbitrary and could lead to resourcing implications RE application numbers going up.

Do you agree with Clause 9 of the Bill?

Unsure.

Please provide information to support your answer here:

The Council has no issue with the intention of the Clause, but, as with Clause 8, considers this Clause to also be too arbitrary. Sites and planning applications vary, and there should be scope to allow for this variability.

Clause 10 - Ecosystem services

Do you agree with Clause 10 of the Bill?

Unsure.

Please provide information to support your answer here:

See response to Clause 1.

Clause 11 - Interpretation: 2011 Act

Do you agree with Clause 11 of the Bill?

Yes.

Please provide information to support your answer here:

No issue from a planning perspective.

Clause 12 – Interpretation: 2015 Order

Do you agree with Clause 12 of the Bill?

Yes.

Please provide information to support your answer here:

No issue from a planning perspective.

Clause 13 - Interpretation: general

Do you agree with Clause 13 of the Bill?

Yes.

Please provide information to support your answer here:

No issue from a planning perspective.

Clause 14 - Commencement

Do you agree with Clause 14 of the Bill?

Yes.

Please provide information to support your answer here:

No issue from a planning perspective.

This page is intentionally left blank



Subject:	Consultation on proposed changes to the Classes and Thresholds in the Schedule to the Planning (Development Management) Regulations (Northern Ireland) 2015 by the Department for Infrastructure
Date:	15 th September 2026
Reporting Officer(s):	Kate Bentley, Director of Planning and Building Control
Contact Officer(s):	Ed Baker, Planning Manager (Development Management)

Restricted Reports	
Is this report restricted?	Yes ☐ No ☒
If Yes, when will the report become unrestricted?	
After Committee Decision	☐
After Council Decision	☐
Some time in the future	☐
Never	☐

Call-in	
Is the decision eligible for Call-in?	Yes ☒ No ☐

1.0	Purpose of Report or Summary of Main Issues
1.1	To report on the Department for Infrastructure's latest public consultation on its review of the Development Management Regulations. The Department is seeking views on its proposed changes to the classes and thresholds in the Schedule of the Regulations. These relate to the definition of <i>Major development</i> and the thresholds for requiring councils to consult the Department as to whether the application is deemed of <i>regional significance</i> and determined by the Department.
1.2	The Committee is asked to agree the Council's response to the consultation.
2.0	Recommendation
2.1	That the Committee notes the content of the report and agrees the Council's response as set out in this report (paragraph 3.13 to 3.46). The Committee is asked to give delegated authority to the Director of Planning and Building Control to finalise the Council's response in line with this report and any additional comments made by the Committee.

3.0	Main Report
	<u>Background</u>
3.1	The Planning (Development Management) Regulations (Northern Ireland) 2015 (“the Regulations”) set out a range of provisions including, but not limited to, the following: • Hierarchy of development – the definition of Major development. • Regionally significant applications – the development thresholds for when councils are required to consult DfI on whether it considers the proposal to be regionally significant and wishes to “call-in” in the application for its determination. • Proposal of Application Notices (PANs) – the content of PAN applications required to be made to the Council. PAN applications set out the proposals for Pre-application Community Consultation relating to applications for Major Development. • Pre-application Community Consultation – requirements for Pre-application Community Consultation including holding a public event and publicising the proposal in a newspaper. • Duty to decline to determine applications where section 27 is not complied with – specifying a period of 21 days for a council to require additional information before declining to determine an application for Major development where the requirements of the PAN process were not followed. • Pre-Determination Hearings – the requirement to hold a Pre-Determination Hearing for applications notified to DfI but which it has returned to the council for determination.
3.2	A copy of the current Regulations is provided at Appendix 1 .
3.3	The Department for Infrastructure (DfI) previously undertook public consultation on proposed changes to the Regulations between December 2023 and March 2024.
3.4	The Committee considered and agreed the Council’s response to this earlier consultation at its 13 th February 2024 meeting (item 16). The Committee delegated authority to the Director of Planning and Building Control to respond to the public consultation as per the assessment outlined within the report. A copy of the response is provided at Appendix 2 .
	<u>Subsequent changes to the Regulations</u>
3.5	Following the previous public consultation, DfI subsequently made changes to the Regulations through the Planning (Miscellaneous Amendments) Regulations (Northern Ireland) 2025, enacting the following changes:
3.6	i. that councils are only required to produce an Annual Monitoring Report in respect of its Local Development Plan once its Local Policies Plan has been adopted; ii. to require applicants for planning permission for Major development to maintain a website in respect of Pre-Application Community Consultation; and iii. removal of the requirement for councils to hold mandatory Pre-Determination Hearings under certain circumstances.
3.7	DfI refers to these changes as “Phase 1” of its review of the Regulations.

	<u>Public Consultation on Phase 2 of DfI's review of the Regulations</u>
3.8	Following engagement workshops with council officers, elected members, planning agents and other stakeholders from across the region in Autumn 2025, DfI has issued a fresh public consultation on specific proposals to amend the classes and thresholds in the Schedule to the Regulations. The consultation runs from 14th August to 9th October 2026. A copy of the public consultation document is provided at Appendix 3.
3.9	DfI is seeking views on its proposed changes to the following: • Regulation 2 – hierarchy of development • Regulation 3 – DfI's jurisdiction in relation to developments of regional significance • Schedule – Major development thresholds (i.e. definition of Major development)
3.10	DfI states that these changes are part of a wider package of measures delivering change through the regional Planning Improvement Programme (PIP), brought forward by DfI, local government and other stakeholders, in response to the 2022 NI Audit Office and NI Assembly Public Accounts Committee reviews of the NI planning system.
3.11	DfI is aiming to encourage a more proportionate and responsive approach to processing planning applications, with resources and decision-taking mechanisms tailored according to the scale and complexity of the proposed development. The objective of the proposed changes is to ensure that the classes of development and corresponding thresholds in the Schedule remain fit for purpose and relevant for current and future development trends.
3.12	DfI confirms that it would retain the ability to call-in any application at any point in the process, where appropriate.
	<u>Assessment</u>
3.13	Officers advise that the proposed changes to the classes and thresholds are largely technical in nature, and in the most part relate to infrastructure, commercial uses and industrial processes. The proposals affect the following classes only: • Class 2 – Energy Infrastructure • Class 3 – Transport Infrastructure • Class 4 – Waste Infrastructure • Class 5 – Extractive Industry • Class 8 – Business, Industry, Storage and Distribution • Class 9 – Any other development Class 2 – Energy Infrastructure
3.14	DfI describes the proposed changes as moving away from individually described developments to the fundamental purpose of the technology in question. The revised class includes generation; storage and transmission; and the types of development within that class including heat or electricity generation, thermal, electrical, mechanical or chemical storage. The changes are in part intended to future proof new technologies.
3.15	<i>Major development thresholds:</i> these include an increase from 5mw to 10mw for heat and electricity generation stations. There would be a new threshold of 200 mw hours for energy storage, 500 mw hours for below ground storage of energy in chemical form and 1 gw per hour for chemical energy storage. Other thresholds would remain the same.

3.16	<i>Regionally significant development thresholds:</i> the threshold for electricity generating stations would increase from 30 mw to 75 mw, likely meaning that more applications would be determined by councils. There would also be new thresholds to reflect the new sub-classes.
3.17	<i>Officer assessment:</i> the proposed changes seek to provide greater clarity around the different forms of energy infrastructure and future proof new technologies. The changes are of a technical nature and no objection is offered.
	Class 3 – Transportation
3.18	No changes are proposed to the thresholds for Major and regionally significant development. However, DfI proposes to separate the various sub-classes and adjust the formatting.
3.19	<i>Officer assessment:</i> the proposed changes seek to provide greater clarity around the different forms of transport infrastructure and are supported.
	Class 4 – Waste infrastructure
3.20	DfI proposes to change some of the thresholds. It also proposes to change the description of the class to include land-fill of non-hazardous waste.
3.21	<i>Major development thresholds:</i> DfI proposes to remove the annual 25,000 tonnes threshold for waste management facilities for hazardous waste so that all such facilities are classified as Major development. It also proposes to change the threshold for incineration and chemical treatment facilities from 100 tonnes per day (i.e. 36,500 tonnes per annum) to 25,000 tonnes per annum. There are no proposals to change the threshold for waste water treatment plants.
3.22	<i>Officer assessment:</i> it is understood that smaller waste management facilities would likely have a capacity of at least 15,000 tonnes per annum and so the removal of the current threshold of 25,000 tonnes could result in more schemes being classified as Major development, however, the number of such applications is likely to be limited. The change to the threshold for incineration and chemical treatment facilities could similarly increase the number of Major applications in this category but again is unlikely to be very significant. The changes are of a technical nature and no objection is offered.
	Class 5 – Extractive industry
3.23	DfI proposes to change the title of this class from “Minerals” to “Extractive Industry”, along with reformatting the layout and descriptions. The proposals also include the introduction of a new sub-class of “Exploration or extraction of geothermal energy”.
3.24	<i>Major development thresholds:</i> no changes are proposed to the current thresholds. A threshold is introduced for the proposed new sub-classes of “exploration or extraction of geothermal energy” (“where the drilling is or exceeds 200m”); and “petroleum and natural gas” (“any proposals relating to the exploration or extraction of hydrocarbons”).
3.25	<i>Regionally significant thresholds:</i> similarly, there are new thresholds for the new sub-classes of “exploration or extraction of geothermal energy” (“where the drilling is or exceeds 500m”); and “petroleum and natural gas” (“any proposals relating to the exploration or extraction of hydrocarbons”).

3.26	<i>Officer assessment:</i> the proposed changes to this class relate to the introduction of the sub-classes and their associated major and regionally significant thresholds. It is considered that these changes are of a technical nature and no objection is raised. Class 8 – Business, industry, storage and distribution
3.27	DfI proposes to introduce a new sub-class for carbon capture installations as these installations are often associated with industrial activities. Carbon capture and storage (CCS) is a process by which carbon dioxide (CO₂) from industrial installations and other large-scale emission sources is separated before it is released into the atmosphere, then transported to a long-term storage location. The CO₂ is captured from a large point source, such as power stations, cement or steel plants, or natural gas processing facilities and is typically stored in a deep geological formation.
3.28	<i>Major development thresholds:</i> no changes are proposed to the current thresholds. However, all proposed carbon capture installations involving underground storage / sequestration of carbon would be considered Major development, as well as require consultation with DfI to consider whether the proposal would be regionally significant.
3.29	<i>Officer assessment:</i> the introduction of the new sub-class for carbon capture installations recognises that such underground development could give rise to particular and significant environmental impacts, which would warrant pre-application community consultation and additional assessment time through a Major application. The changes are of a technical nature and no objection is offered. Class 9 – Any other developments
3.30	DfI proposes to amend the description to: ‘<i>Development not falling within any class or sub-class of development described in Parts 1 – 8 above.</i>’ This removes the words “wholly” and “single” from the current class description to clarify the requirement and threshold.
3.31	<i>Officer assessment:</i> it is understood that this change is to remove any ambiguity as to whether a mixed-use development that comprises uses falling under different classes, but individually falling below the threshold for that class, would be Major development under class 9. This change is therefore welcomed. In addition, officers consider it beneficial for the Department to substitute “Parts” for “Classes”, the latter being more consistent with section 2 of the Schedule, which describes the table as setting out the “classes” of development belonging to the category of Major development (rather than “parts”). Major housing development
3.32	At the Autumn 2025 workshops with stakeholders, DfI presented proposals to amend Class 6 Housing, lowering the threshold for Major housing development from the current 50 residential units to 25 residential units. Officers expected this change to be reflected in the public consultation, but it is not included.
3.33	Officers advise that smaller developments of 25 to 49 residential units (currently classified as Local development) can have similar impacts on communities as Major development, particularly in tight inner urban sites in Belfast compared with greenfield development on the edge of the city. There may therefore be merit in reducing the threshold for Major housing development to 25 residential units to increase mandatory public engagement at the pre-application stage, helping to shape better development with communities. Such a change would also reflect the fact that slightly smaller housing schemes can be equally as complex to assess and process. Officers would therefore suggest that the lowering of the residential Major development threshold should be further considered.

3.34	DfI has confirmed to officers that it has not included proposals to lower the threshold for Major housing development in this consultation because of the need for further policy development in this area. Other points
3.35	If it is the Department's intention to retain an ability to call in any application at any time, it is considered that it should issue clear guidance in the interests of certainty and transparency as to the circumstances when it would exercise such powers and at what point in the application process.
3.36	In its response to the previous public consultation (see Appendix 2), the Council raised the following additional points. Officers consider that these points should be repeated in its response to the current public consultation.
3.37	The consequence of development being classified as "Major" is twofold. 1. that the applicant is required to carry out formal pre-application community consultation before submitting the application to the council; 2. that the decision on the application cannot be delegated to officers but must be made by the planning committee.
3.38	DfI has suggested that proposals for Major development '<i>...require considerably more assessment and processing resources than local developments which, by comparison, are less complex and, on the whole, raise fewer public interest issues.</i>' (par. 2.2).
3.39	However, this is not always the experience of the Council's Planning Service. Applications for Local development, such as housing schemes of less than 50 residential units, can often be equally complex and sometimes raise more public interest issues than Major applications. Consideration should be given to the requirement for mandatory secondary "lighter touch" pre-application community consultation on certain scale Local applications. Local applications can have a significant impact on local people, particularly in locations such as Belfast which comprise many areas of tight-knit and dense communities where changes to the built environment can have considerable consequences. There should be a formal opportunity for those communities to engage with developers to help shape proposals for the better.
3.40	Conversely, there are examples of Major development proposals, such as larger commercial buildings on industrial estates, where the value of mandatory pre-application community consultation is questionable. There should be the provision for the council to advise that pre-application community consultation is not required in specific cases or for a council to be able to publish "local guidance" on when pre-application community consultation is necessary (this would be criteria based similar to a scheme of delegation) so that the application process can be expedited, where appropriate.
3.41	Officers recognise that consideration of these issues cannot be separated from the work to date of the regional Planning Engagement Partnership, which published its report: Planning Your Place: Getting Involved in March 2022. The report made various recommendations on how to improve public engagement in the planning process including the pre-application community consultation process.

3.42	It is noteworthy that the Council's Planning Service no longer places emphasis on whether a proposal falls under the "Major" or "Local" development categories, but whether a proposal is of "strategic" importance to the city. For example, there are many examples of Local applications which are of strategic significance to Belfast and Major applications which are not necessarily of strategic importance, classified as "technical Major applications" by virtue of their scale, particularly those relating to change of use of a large area of land.
3.43	Regarding category 7 'Retailing, Community, Recreation & Culture', consideration should be given to splitting 'Retailing' into a separate category since retail development presents distinct issues from the other forms of development in this category including retail impact.
3.44	Consideration should be given to increasing the 1 ha threshold for Major developments to 2 ha as some Major applications are considered "technical Major applications" because of their scale but not their impact. Typically, this relates to proposals for a change of use of land or proposals such as "environmental improvements" relating to public realm. Minor applications
3.45	Officers would welcome the introduction of a third category of development, perhaps titled "Minor" development, for smaller scale proposals such as householder, advertisement, Listed Building Consent and Conservation Area Consent applications. This recognises that the definition of "Local" development is currently far too wide, ranging for an application for single storey extension or satellite dish to 49 dwelling units, and does not permit meaningful interrogation of performance. There should in turn be an even shorter statutory target for determination of such Minor applications, which is less than the 15 weeks average processing time currently prescribed to Local applications (in GB, there has been a target of 8 weeks to process smaller scale applications).
3.46	Consideration should also be given to removing the requirement for all applications for Major development to be decided by a planning committee. This should be a matter for each council to decide and set out in its scheme of delegation.
4.0	Financial & Resource Implications
4.1	The proposals include increases to some of the thresholds for regionally significant applications, which could mean more applications being processed by the Council. The NI planning system does not operate on a cost-recovery basis with planning fees set regionally and do not cover the cost of delivery of the Council's planning functions. Therefore, the proposals could result in some additional costs to the Council. However, this needs to be offset by the desirability of the Council determining such applications and context of local accountability.
5.0	Equality or Good Relations Implications / Rural Needs Assessment
5.1	There are no equality or good relations / rural needs implications associated with this report.
6.0	Appendices – Documents Attached
	Appendix 1 – current Development Management Regulations. Appendix 2 – Council's response to the 2023/24 public consultation Appendix 3 – DfI consultation review document

This page is intentionally left blank

2015 No. 71

PLANNING

**The Planning (Development Management) Regulations
(Northern Ireland) 2015**

Made - - - - *25th February 2015*

Coming into operation - *1st April 2015*

The Department of the Environment makes the following Regulations in exercise of the powers conferred by sections 25(2), 26(1), 27(4) and (5), 30(1), 31(1) and (3), 50(2) and 247(1) and (6) of the Planning Act (Northern Ireland) 2011^(a).

Citation, commencement and interpretation

1.—(1) These Regulations may be cited as the Planning (Development Management) Regulations (Northern Ireland) 2015 and come into operation on 1st April 2015.

(2) In these Regulations a reference to a section is a reference to a section of the Planning Act (Northern Ireland) 2011.

(3) In these Regulations—

“the GDPO” means the Planning (General Development Procedure) Order (Northern Ireland) 2015^(b);

“appointed officer” means a person appointed by the council for the purposes of section 31(1)(a);

“appropriate council” means the council for the district in which the land to which the application relates is situated;

“council” means a district council;

“EIA development” has the same meaning as in regulation 2 of the Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2015^(c).

Hierarchy of Developments

2.—(1) For the purposes of section 25(1)(hierarchy of developments) the classes of development belonging to the category of major development are—

- (a) development described in Column 1 of the table in the Schedule, where any applicable threshold or criterion in the corresponding entry in Column 2 of that table is met or exceeded; and

^(a) 2011 c.25 (N.I.).

^(b) SR 2015 No.72.

^(c) SR 2015 No.74.

- (b) any change to or extension of development of a class described in paragraphs 1 to 9 of Column 1 of the table in the Schedule where that change or extension itself meets or exceeds the threshold or criterion in the corresponding entry in Column 2 of that table.
- (2) All other development belongs to the category of local development.

Department's jurisdiction in relation to developments of regional significance

3. The major development prescribed for the purposes of section 26(1) is—
- (a) development described in Column 1 of the table in the Schedule, where any applicable threshold or criterion in the corresponding entry in Column 3 of that table is met or exceeded; and
 - (b) any change to or extension of development of a class described in paragraphs 1 to 5 of Column 1 of the table in the Schedule where that change or extension itself meets or exceeds the threshold or criterion in the corresponding entry in Column 3 of that table.

Content of proposal of application notice

4. A proposal of application notice must be in writing and must, in addition to those matters required by section 27(4), also contain—
- (a) a copy (where applicable) of any determination made under regulation 7(1)(a) of the Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2015 in relation to the development to which the proposal of application notice relates;
 - (b) a copy of any notice served by the Department under section 26(4) or (6); and
 - (c) an account of what consultation the prospective applicant proposes to undertake, when such consultation is to take place, with whom and what form it will take.

Pre-application community consultation

5.—(1) Where the prospective applicant has been served with a notice under section 26(4), the Department must consult the appropriate council as respects a proposed application and in doing so, must give a copy of the proposal of application notice to that council.

- (2) The prospective applicant must—
- (a) hold at least one public event in the locality in which the proposed development is situated where members of the public may make comments to the prospective applicant as regards the proposed development; and
 - (b) publish in a newspaper circulating in the locality in which the proposed development is situated a notice containing—
 - (i) a description of, and the location of, the proposed development,
 - (ii) details as to where further information may be obtained concerning the proposed development,
 - (iii) the date, time and place of the public event,
 - (iv) a statement explaining how, and by when, persons wishing to make comments to the prospective applicant relating to the proposal may do so, and
 - (v) a statement that comments made to the prospective applicant are not representations to the council or as the case may be the Department and if the prospective applicant submits an application there will be an opportunity to make representations on that application to the council or as the case may be the Department at a later stage.

(3) A public event held by the prospective applicant in accordance with paragraph (2)(a) must not be held earlier than 7 days after notification of the date, time and place of such event is given under paragraph (2)(b)(iii).

Duty to decline to determine application where section 27 not complied with

6. The period prescribed for the purposes of section 50(2) is the period of 21 days beginning with the day on which the additional information referred to in that subsection was requested.

Pre-determination hearings

7.—(1) The classes of development prescribed for the purposes of section 30(1) are those developments to which a direction under Article 17 of the GDPO applies where the Department has notified the council that it does not intend to determine the application under section 29(1).

(2) The persons who submit representations to the council in respect of the application in accordance with paragraph (1) are prescribed for the purposes of section 30(1), as persons to whom the council are to give an opportunity of appearing before and being heard by a committee of the council.

Content of scheme of delegation

8.—(1) A scheme of delegation must—

- (a) describe the classes of local development to which the scheme applies; and
- (b) state with respect to every such class which of the applications mentioned in paragraph (2) are to be determined by an appointed officer and, if such application is only to be so determined in particular circumstances, specify those circumstances.

(2) The applications are—

- (a) an application for planning permission; or
- (b) an application for consent, agreement or approval required by a condition imposed on a grant of planning permission.

(3) A scheme of delegation must include provision that prohibits an appointed officer from determining an application for planning permission in the circumstances mentioned in paragraph (4).

(4) The circumstances are that—

- (a) the application is made by the council or an elected member of the council; or
- (b) the application relates to land in which the council has an estate.

Procedure for the preparation and adoption of scheme of delegation

9. The council must send a copy of the scheme of delegation to the Department and must not adopt the scheme until the scheme has been approved by the Department.

Publication of the scheme

10. On adoption of the scheme the council must—

- (a) make a copy of the scheme of delegation available for inspection at an office of the council; and
- (b) publish the scheme of delegation on the website of the council.

Subsequent schemes of delegation

11. The council must prepare a scheme of delegation at intervals of no greater than three years.

Transitional provision

12. Section 27 (pre-application community consultation) applies only to applications for planning permission made on or after 1st July 2015 and the requirement in Article 3(3)(e) of the GDPO shall not apply before that date.

Sealed with the Official Seal of the Department of the Environment on 25th February 2015



Angus Kerr
A senior officer of the
Department of the Environment

SCHEDULE

Regulations 2 and 3

Major Development Thresholds

1. In the Table below—

“airport” has the meaning assigned to it in Article 2(2) of the Airports (Northern Ireland) Order 1994^(a)

“area of works” includes any area occupied by apparatus, equipment, machinery, materials, plant, spoil heaps or other facilities or stores required for construction or installation;

“floor space” means floor space in a building or buildings;

2. The Table below sets out the classes of development belonging to the category of major development.

<i>Description of Development</i>	<i>Major Developments Threshold or Criteria</i>	<i>Major Developments prescribed for the purpose of section 26(1) of the Planning Act (Northern Ireland) 2011</i>
<u>1.EIA development</u>	Development of a description in paragraphs; 1, 3, 4, 5, 6, 11, 12, 15, 17, 18, 22, 23 and 24; mentioned in Schedule 1 to the Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2015.	Development of a description in paragraphs 1, 3, 22, 23 and 24 mentioned in Schedule 1 to the Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2015.
<u>2. Energy Infrastructure</u>		
Electricity generating stations	1. The construction of an electricity generating station where its capacity is or exceeds 5 megawatts. 2. All onshore development associated with the construction of an offshore electricity generating station.	1. The construction of an electricity generating station where its capacity is or exceeds 30 megawatts. 2. All onshore development associated with the construction of an offshore electricity generating station with a capacity which is or exceeds 30 megawatts.
Electrical power lines	The installation of an electrical power line where the voltage exceeds 33 kilovolts if the purpose of the line is the provision of a supply to more than one customer.	The installation of an electrical power line where the voltage: -is 110 kilovolts double circuit overhead line; or -is or exceeds 275 kilovolts, and a length of more than 15 kilometres.

^(a) S.I. 1994/426 (N.I.1).

<i>Description of Development</i>	<i>Major Developments Threshold or Criteria</i>	<i>Major Developments prescribed for the purpose of section 26(1) of the Planning Act (Northern Ireland) 2011</i>
Storage	1. Installations for the storage of petroleum, petrochemical, chemical products or natural gas where the storage capacity of the facility is expected to be 30,000 tonnes or more. 2. Installations for the underground geological storage of petroleum, natural gas, carbon dioxide or compressed air energy storage.	1. Installations for the storage of petroleum, petrochemical, chemical products or natural gas where the storage capacity of the facility is expected to be 200,000 tonnes or more. 2. Installations for the underground geological storage of petroleum, natural gas, carbon dioxide or compressed air energy storage.
Extraction	1. Any proposal relating to the extraction of unconventional hydrocarbons. 2. The extraction of petroleum and natural gas for commercial purposes where the amount extracted exceeds 250 tonnes per day in the case of petroleum and 250,000 cubic metres per day in the case of gas.	1. Any proposal relating to the extraction of unconventional hydrocarbons. 2. The extraction of petroleum and natural gas for commercial purposes where the amount extracted exceeds 500 tonnes per day in the case of petroleum and 500,000 cubic metres per day in the case of gas.
Pipelines	Pipelines with a diameter of more than 400 millimetres or more than 20 kilometres in length: -for the transport of gas, oil or chemicals, or -for the transport of carbon dioxide streams for the purposes of geological storage, including associated booster stations.	Pipelines with a diameter of more than 800 millimetres or more than 40 kilometres in length: -for the transport of gas, oil or chemicals, or -for the transport of carbon dioxide streams for the purposes of geological storage, including associated booster stations.
<u>3. Transport infrastructure.</u> Construction of new or replacement railways, airports, harbours and ports, waterways, transit ways.	The areas of work is or exceeds 1 kilometre in length or 1 hectare.	a) construction of lines for long-distance railway traffic and of airports with a basic runway length of 2,100 metres or more; b) inland waterways and ports for inland-waterway traffic which permit the passage of vessels of over 1,350 tonnes; or c) trading ports, piers for loading and unloading connected to land outside ports (excluding ferry piers) which

<i>Description of Development</i>	<i>Major Developments Threshold or Criteria</i>	<i>Major Developments prescribed for the purpose of section 26(1) of the Planning Act (Northern Ireland) 2011</i>
		can take vessels of over 1,350 tonnes.
<u>4. Waste infrastructure.</u>		
Construction of facilities for use for the purpose of waste management, disposal or treatment.		
Waste Management Facilities	1. An installation for the disposal, treatment or recovery of hazardous waste with a capacity for an annual intake of or more than 25,000 tonnes. 2. Waste disposal installations for the incineration or chemical treatment (as defined in Annex I to Directive 2008/98/EC under heading D9(a)) of non-hazardous waste with a capacity exceeding 100 tonnes per day.	1. An installation for the disposal, treatment or recovery of hazardous waste with a capacity for an annual intake of or more than 100,000 tonnes. 2. Waste disposal installations for the incineration or chemical treatment (as defined in Annex I to Directive 2008/98/EC under heading D9) of non-hazardous waste with a capacity for an annual intake exceeding 100,000 tonnes.
Waste Water	Waste water treatment plants with a capacity exceeding 50,000 population equivalent as defined in Article 2 point (6) of Directive 91/271/EEC.	Waste water treatment plants with a capacity exceeding 150,000 population equivalent as defined in Article 2 point (6) of Directive 91/271/EEC(b).
<u>5. Minerals</u>		
Extraction of minerals	The area of the site is or exceeds 2 hectares.	a) development involving quarries or open-cast mining where the surface of the site exceeds 25 hectares, or peat extraction where the surface of the site exceeds 150 hectares; or b) development involving underground mining where the surface of the site exceeds 2 hectares.
<u>6. Housing.</u>		
Construction of buildings structures or erections for use as residential accommodation;	a) development that comprises 50 units or more; or b) the area of the site is or exceeds 2 hectares.	

(a) O.J. No.L312, 22.11.08, p.3.

(b) O.J. No. L135, 30.5.91, p.40.

<i>Description of Development</i>	<i>Major Developments Threshold or Criteria</i>	<i>Major Developments prescribed for the purpose of section 26(1) of the Planning Act (Northern Ireland) 2011</i>
includes private schemes.		
<u>7. Retailing, Community, Recreation and Culture.</u> (according to Parts A and D of the Schedule to the Planning (Use Classes) Order (Northern Ireland) 2015 ^(a)). Including shops, financial, professional and other services, community and cultural uses, and assembly and leisure.	a) development that comprises 1,000 square metres or more gross floor space outside town centres; or b) the area of the site is or exceeds 1 hectare.	
<u>8. Business, Industry (Light and General), Storage and Distribution.</u> (according to Part B of the Schedule to the Planning (Use Classes) Order (Northern Ireland) 2015	a) development that comprises 5,000 square metres or more gross floor space; or b) the area of the site is or exceeds 1 hectare.	
<u>9. All other development.</u> Any development not falling wholly within any single class of development described in Parts 1 to 8 above.	a) development that comprises 5,000 square metres or more gross floor space; or b) the area of the site is or exceeds 1 hectare.	

(a) S.R. 2015 No. 40.

EXPLANATORY NOTE

(This note is not part of the Order)

These Regulations make provision for the new development management processes for determining planning applications. The statutory rule puts in place the regulatory framework required to implement the development management provisions in Part 3 of the Planning Act (Northern Ireland) 2011 (“the 2011 Act”).

Regulation 2 prescribes the classes of major development.

Regulation 3 prescribes the classes of major development that are considered to potentially be developments of regional significance.

Regulation 4 makes provision regarding the content of the proposal of application notice required under section 27(4) of the 2011 Act.

Regulation 5 sets out the prescribed manner of pre-application community consultation which an applicant will have as a minimum to undertake. This requires the holding of a public event and publication of the proposed event in a local newspaper.

Regulation 6 prescribes the time period for requesting additional information where section 27 of the 2011 Act may not have been complied with.

Regulation 7 prescribes the classes of development in respect of applications for which a council must hold a hearing before reaching a decision and provides who is to be given an opportunity to appear before the committee of the council.

Regulations 8-11 relate to schemes of delegation. Section 31 of the 2011 Act requires a council to prepare a scheme of delegation by which applications for planning permission for local development and for consent, agreement or approval required by a condition imposed on a grant of planning permission are to be determined by an appointed person. This person is defined in regulation 1 as the “appointed officer”. Regulation 8 makes provision in relation to the content of the scheme of delegation and prescribes the circumstances that prohibit an appointed officer from determining an application for planning permission. Regulation 9 requires the council to send a copy of the proposed scheme of delegation to the Department and it may not adopt the scheme until it has been approved by the Department. Regulation 10 sets out the manner of publication of the adopted scheme. Section 31(1)(a)(ii) of the 2011 Act requires a council to prepare a scheme of delegation at such intervals as may be provided for in regulations and regulation 11 sets this period at no greater than every 3 years.

Regulation 12 makes a transitional provision.

The Schedule to these Regulations prescribes the classes of development for the purposes of regulations 2 and 3.

A regulatory impact assessment has been prepared in relation to these Regulations. A copy may be obtained from the Department of the Environment, Causeway Exchange, 1-7 Bedford Street, Belfast, BT2 7EG or accessed at www.doeni.gov.uk

The Explanatory Memorandum is available alongside the Regulations on the government’s website www.legislation.gov.uk

© Crown copyright 2015

Printed in the UK by The Stationery Office Limited under the authority and superintendence of Carol Tullo, Controller of Her Majesty’s Stationery Office being the Government Printer for Northern Ireland and the Officer appointed to print Acts of the Northern Ireland Assembly.

2015 No. 71

PLANNING

**The Planning (Development Management) Regulations
(Northern Ireland) 2015**

£6.00

N6472 03/2015 456472T 19585

ISBN 978-0-337-99638-2



9 780337 996382

Place and Economy Department
Planning and Building Control



Your Ref:

Our Ref:

(Please quote at all times)

Regional Planning Governance & Legislation Team
Department for Infrastructure

Belfast Planning Service
Cecil Ward Building
4-10 Linenhall Street
BELFAST
BT2 8BP

By email: Legislation.Planning@infrastructure-ni.gov.uk

Tel: 028 90 500510

Date: 26th February 2024

Dear Sirs or Madam,

Public Consultation – Review of the Planning (Development Management) Regulations (Northern Ireland) 2015

I refer to the above public consultation, which was considered by Belfast City Council's Planning Committee on 13th February.

The Council's response to the consultation is set out in this letter along with the Committee report, enclosed.

Review of classes of development

The consequence of development being classified as "Major" is twofold. Firstly, that the applicant is required to carry out formal pre-application community consultation before submitting the application to the council. Secondly, that the decision on the application cannot be delegated to officers but must be made by the planning committee.

In its consultation, DfI suggests that proposals for Major development '*...require considerably more assessment and processing resources than local developments which, by comparison, are less complex and, on the whole, raise fewer public interest issues.*' (par. 2.2).

However, this is not always the experience of the Planning Service. Applications for Local development, such as housing schemes of less than 50 residential units, can often be equally complex and raise more public interest issues than Major applications. Whilst the current thresholds for Major development are generally considered to be appropriate, consideration should be given to the requirement for mandatory secondary "lighter touch" pre-application community consultation on certain scale Local applications. Local applications can have a significant impact on local people, particularly in locations such as Belfast which comprise many areas of tight-knit and dense communities where changes to the built environment can have

considerable consequences. There should be a formal opportunity for those communities to engage with developers to help shape proposals for the better.

Conversely, there are examples of Major development proposals, such as larger commercial buildings on industrial estates, where the value of mandatory pre-application community consultation is questionable. There should be the provision for the council to advise that pre-application community consultation is not required in specific cases or for a council to be able to publish “local guidance” on when pre-application community consultation is necessary (this would be criteria based similar to a scheme of delegation).

The Council recognises that consideration of these issues cannot be separated from the work to date of the regional [Planning Engagement Partnership](#), which published its report: [Planning Your Place: Getting Involved](#) in March 2022. The report made various recommendations on how to improve public engagement in the planning process including the pre-application community consultation process.

It is noteworthy that the Council’s Planning Service no longer places emphasis on whether a proposal falls under the “Major” or “Local” development categories, but whether a proposal is of “strategic” importance to the city. For example, there are many examples of Local applications which are of strategic significance to Belfast and Major applications which are not necessarily of strategic importance, classified as “technical Major applications” by virtue of their scale, particularly those relating to change of use of a large area of land.

Nevertheless, there is often a perception of the importance of a Major application and in this regard, the Department may wish to consider increasing the types of energy infrastructure development, particularly renewables, that fall within the Major development category in order that they are prioritised. Although this needs to be balanced against the commercial disadvantages of making applicants have to go through the 12-week Proposal of Application (PAN) process in terms of added time to the process when the regional objective is to facilitate such proposals in an efficient and timely manner.

The Council welcomes the proposed introduction of a “mixed development” category of Major development for the avoidance of any doubt – its Planning Service has experience of applicants trying to argue that their proposal is not Major development because it is a mixed-use scheme which does not fall within any of the specific current categories even though it is of considerable scale.

Following a High Court challenge, clarification should be provided in the updated regulations of the category of development that Battery Energy Storage Systems (BESS) fall under to avoid future potential confusion.

In relation to category 6 ‘Housing’, a significant upward change in the threshold for definition of major housing developments could result in virtually all residential developments proposed being classified as ‘local’ with resultant implications for the time available for processing and the removal of the need for pre-engagement processes such as PAD and PAN along with the requirement to consider masterplanning under Policy DES2 of the Belfast LDP Plan Strategy 2035. This would therefore not be supported.

Regarding category 7 ‘Retailing, Community, Recreation & Culture’, consideration should be given to splitting ‘Retailing’ into a separate category since retail development presents distinct issues from the other forms of development in this category including retail impact.

Consideration should be given to increasing the 1 ha threshold for Major developments to 2 ha as some Major applications are considered “technical Major applications” because of their scale but not their impact. Typically, this relates to proposals for a change of use of land or proposals such as “environmental improvements” relating to public realm.

The Council has no observations in relation to the current thresholds for consulting DfI on potentially regionally significant planning applications.

Pre-application Community Consultation

The Council recognises the significant merits of online and digital consultation in reaching a wider and in some cases younger population. However, it is considered that this should not be a substitute for face-to-face public events because of the value of in-person communication and commitment to genuine engagement that face to face meetings can demonstrate. The Council therefore supports “Option 1” of the consultation, which is to require both an in-person public event and online/digital consultation. Option 2, which is to give the developer discretion as to whether to carry out in-person consultation or online/digital consultation is not considered appropriate.

The requirements of the pre-application community consultation process should be re-examined having regard to the *Planning Your Place: Getting Involved* report. Consideration should be given to prescribing further publicity requirements including “leaflet drops” to local property and site notices to be erected by applicants.

It is also essential that pre-application community consultation is much more than a simple “tick box” exercise carried out by the applicant. The bar for Pre-Application Community Consultation (PACC) reports submitted with applications is arguably low. There must be a mandatory requirement for applicants to set out the views of local people and interested parties in the report, how they have responded to each of the points, and where changes were not made to address them, to clearly explain and justify the reasons why.

There should also be an automatic requirement for the applicant to notify the locally Elected Members for the area of the pre-application community consultation.

Pre-Determination Hearings

The Department is proposing to remove the requirement for councils to hold a Pre-Determination Hearing (which in turn triggers a further meeting of the Committee to retake the decision) when an application is returned to the council for determination following notification to DfI. The current requirement is an unnecessary and excessive administrative burden which adds to delays to the application process and creates considerable uncertainty for applicants, an anathema for investors.

The proposal to remove the requirement for statutory Pre-Determination Hearings under such circumstances and to instead give councils the power to hold a discretionary Pre-Determination Hearing is very much welcomed with Belfast City Council having lobbied for this change for many years.

Other points

The Council welcomes the proposal for a third category of development, perhaps titled “Minor” development, for smaller scale proposals such as householder,

advertisement, Listed Building Consent and Conservation Area Consent applications. This recognises that the definition of “Local” development is currently far too wide, ranging from an application for single storey extension or satellite dish to 49 dwelling units, and does not permit meaningful interrogation of performance. There should in turn be an even shorter statutory target for determination of such Minor applications, which is less than the 15 weeks average processing time currently prescribed to Local applications.

Consideration should also be given to removing the requirement for all applications for Major development to be decided by a planning committee. This should be a matter for each council to decide and set out in its scheme of delegation.

The regulations relating to schemes of delegation should also be amended. Unlike in NI, there is no requirement in England and Wales for councils to have their schemes of delegation approved by central government. This is a localised decision-making matter and the current requirements are one of too many examples of the Department’s over-interventionalist role in the planning system. The Department could perhaps amend the legislation to enable it to intervene if it considers that an individual council’s scheme of delegation is inappropriate. In practice, it is questioned how many times the Department has not approved a council’s scheme of delegation since 2015.

Importantly, the Council’s proposed response to this focused consultation should not be considered to conclude that these regulations (and others applicable to the development management process) do not need further consideration and potential amendment.

I trust that this feedback to the consultation is constructive and helpful. Please let me know should you require any clarification or further information.

Yours faithfully,

Ed Baker
Planning Manager (Development Management)

PUBLIC CONSULTATION

Review of the Classes and Thresholds Schedule to The Planning (Development Management) Regulations (Northern Ireland) 2015

August 2026



© Crown copyright, Department for Infrastructure 2026

You may use and re-use this information (not including logos) under the terms of the Open Government Licence.

Email enquiries regarding the re-use of this information to: psi@nationalarchives.gsi.gov.uk.

Contents

1	Responding to this consultation document	4
1.1	Consultation Period	4
1.2	How to Respond.....	4
1.3	Freedom of Information Act 2000 - Confidentiality of responses.....	5
1.4	Impact Assessments	6
2	Introduction	6
3	Structure of the consultation	8
4	Regulations 2 and 3, and the Schedule (Major Development Thresholds) to The Planning (Development Management) Regulations (Northern Ireland) 2015	9
5	Class 2 - Energy Infrastructure in the Schedule to The Planning (Development Management) Regulations (Northern Ireland) 2015.....	13
6	Class 3 - Transport Infrastructure in the Schedule to The Planning (Development Management) Regulations (Northern Ireland) 2015.....	20
7	Class 4 - Waste Infrastructure in the Schedule to The Planning (Development Management) Regulations (Northern Ireland) 2015.....	22
8	Class 5 - Extractive Industry in the Schedule to The Planning (Development Management) Regulations (Northern Ireland) 2015.....	24
9	Class 8 - Business, Industry, Storage and Distribution in the Schedule to The Planning (Development Management) Regulations (Northern Ireland) 2015.	26
10	Class 9 - Any Other Development in the Schedule to The Planning (Development Management) Regulations (Northern Ireland) 2015.....	27
11	Draft Statutory Rule amending The Planning (Development Management) Regulations (Northern Ireland) 2015	29

1 Responding to this consultation document

The Department for Infrastructure would like to invite views and contributions from partners and stakeholders on this targeted consultation on potential changes to the **Classes and Thresholds in the Schedule to The Planning (Development Management) Regulations (Northern Ireland) 2015** (the Development Management Regulations), as set out in this document.

1.1 Consultation Period

The targeted consultation will run for 8 weeks from **14 August to the 9 October 2026**.

1.2 How to Respond

The preferred way to respond to this targeted consultation is **online** via the **NI Direct - Citizen Space** website using the link below:

<https://consultations2.nidirect.gov.uk/dfi-1/review-of-the-classes-and-thresholds>

Copies in other languages and formats (including Braille, large print etc.), can be made available on request. If it would assist you to access this document in an alternative format or language other than English, please contact us using the Email or postal address below or by calling 0300 200 7830.

Written responses should reflect the structure of the consultation document as far as possible with references to question numbers where relevant. Where these cannot be submitted via Citizen Space, they can be sent to us by:

1. **Email:**

Legislation.Planning@infrastructure-ni.gov.uk

2. **Post:**

Public Consultation
Review of the Classes and Thresholds in the Schedule to The Planning
(Development Management) Regulations (NI) 2015
Regional Planning Governance and Legislation
Department for Infrastructure
3rd Floor, James House
2 - 4 Cromac Avenue, The Gas Works
Belfast BT7 2JA

The Department welcomes submissions up to 5.00pm Friday 9 October 2026; unfortunately, responses received after this date will not be considered.

If you have any comments or complaints about the consultation process itself (rather than the content of this document), these should be directed to the postal or Email address above.

1.3 Freedom of Information Act 2000 - Confidentiality of responses

The Department may publish a summary of responses following the closing date for receipt of comments. Your response, and all other responses to this publication, may be disclosed on request and/or made available on the DfI website (in a redacted form). The Department can only refuse to disclose information in exceptional circumstances. Before you submit your response, please read the paragraphs below on the confidentiality of responses as this will give you guidance on the legal position about any information given by you in response to this publication.

The Freedom of Information Act 2000 (FOIA) and Environmental Information Regulations 2004 (EIR) give the public a right of access to any information held by a public authority, namely, the Department in this case. This right of access to information includes information provided in response to a consultation. The Department cannot automatically consider as confidential information supplied to it in response to a consultation. However, it does have the responsibility to decide whether any information provided by you in response to this publication, including information about your identity, should be made public or treated as confidential. The Lord Chancellor's Code of Practice on the Freedom of Information Act provides that:

- The Department should only accept information from third parties in confidence if it is necessary to obtain that information in connection with the exercise of any of the Department's functions and it would not otherwise be provided.
- The Department should not agree to hold information received from third parties 'in confidence' which is not confidential in nature.
- Acceptance by the Department of confidentiality provisions must be for good reasons, capable of being justified to the Information Commissioner.

The information you provide in your response, excluding personal information, may be published, or disclosed in accordance with FOIA or EIR. Any personal information you provide will be handled in accordance with the UK-GDPR and will not be published. If you want the non-personal information that you provide to be treated as confidential, please tell us why, but be aware that, under the FOIA or EIR, we cannot guarantee confidentiality.

For information regarding your personal data, please refer to the DfI Privacy Notice at www.infrastructure-ni.gov.uk/dfi-privacy.

For further details on confidentiality, the FOIA and the EIR please refer to www.ico.org.uk.

1.4 Impact Assessments

Government bodies are required to screen the impact of new policies and legislation against a wide range of criteria, including equality and human rights.

Equality Impact Assessment Screenings and a Preliminary Regulatory Impact Assessment have been undertaken and are available to view or download from the Citizen Space web link or the Department's [website](#).

The Department has determined that there would be no differential impact in rural areas or on rural communities. It also determined that the proposals laid out in this document are fully compliant with the Human Rights Act 1998.

The Department welcomes views and comments on whether the conclusions contained in the above assessments are correct.

2 Introduction

- 2.1 This targeted consultation invites views from partners and stakeholders on potential changes to the Classes and Thresholds in the Schedule to **The Planning (Development Management) Regulations (Northern Ireland) 2015** ('the Development Management Regulations'). These potential changes focus on the following aspects of the Development Management Regulations:

- regulation 2 (Hierarchy of developments);

- regulation 3 (Department's jurisdiction in relation to developments of regional significance); and
- Schedule (Major development thresholds).

2.2 Changes to the Development Management Regulations are part of a wider package of measures delivering change through the **Planning Improvement Programme**¹ ('PIP'), brought forward by the **Department for Infrastructure** ('the Department'), local government and other stakeholders. This is one of many measures being brought forward that aim to create an efficient, effective and equitable planning system, trusted to deliver high quality, sustainable inclusive and healthy places.

2.3 The PIP includes actions and measures recommended through the review of the implementation of the **Planning Act (Northern Ireland) 2011** ('the 2011 Act'), which was required under section 228 of the 2011 Act. The recommendations emerged from numerous proposals, suggested revisions and recommendations for change or improvement submitted following the Call for Evidence.

2.4 In relation to the Development Management Regulations, the Department confirmed in its Review Report² that it would undertake a review of the classes of development, existing thresholds and categories of development to determine the need for revisions.

2.5 In December 2023 the Department issued an initial consultation paper on the review of the Development Management Regulations. The consultation was designed to obtain views and comments on a number of aspects including Pre-Application Community Consultation (PACC), Pre-Determination Hearings (PDHs) and various classes and thresholds for determining the hierarchy of development proposals in Northern Ireland. The review was separated into two phases, phase one which covered legislative amendments to the Development Management Regulations, PACC and PDH's provisions and procedures came into operation on the 1 August 2025. This targeted consultation represents the second phase of the review of the Development Management Regulations and specifically relates to the classes and thresholds schedule.

¹ <https://www.infrastructure-ni.gov.uk/topics/planning/planning-improvement-programme>

² <https://www.infrastructure-ni.gov.uk/publications/review-planning-act-ni-2011-report>

- 2.6 Following the initial public consultation in December 2023, the Department hosted two workshops in Autumn 2025 to discuss the responses and the proposed changes. As a result of this process and having considered the very helpful, knowledgeable and informative input from all stakeholders, the Department has drafted the proposed amendments to the Schedule.
- 2.7 While some amendments are minor and reflect simple changes to the descriptions, thresholds or metrics, the responses received have resulted in other more fundamental amendments. Conscious these somewhat more significant changes will be unexpected and will represent a shift from the previous format, the Department has decided to hold a further 8-week targeted consultation period to obtain views on the proposed changes.
- 2.8 The classifications and thresholds set out in the Schedule form part of a screening framework. Their purpose is to determine whether a proposed development falls within the category of major, or regionally significant development, and therefore the procedural route it will follow within the planning system. They do not in themselves determine whether a proposal is acceptable in planning terms, nor do they assess the merits of an application or the extent to which any impacts may be mitigated. The acceptability of any development, including its environmental, social and economic effects, will continue to be assessed in full through the planning application process, in accordance with relevant policy, legislation and consultation requirements.
- 2.9 While the classifications aim to provide clarity and provide for future technologies, through broad and consistent categories, it is recognised that no system can capture every scenario precisely. Accordingly, safeguards remain in place. The Department retains the ability to call in applications where appropriate, and proposals falling to be screened by the Department may still be screened out and returned for determination by the councils. This ensures that the system remains flexible, proportionate, and capable of responding to the particular circumstances of individual developments.

3 Structure of the consultation

- 3.1 This targeted consultation sets out the aims and various amendment proposals to the Classes and Thresholds in the Schedule to the Development Management Regulations and seeks views and feedback on the proposed changes.

- 3.2 Section 4 of this consultation document explores the aims and key issues supporting regulations 2 and 3 relating to the hierarchy of development, which provide the thresholds and criteria for the category of major development, and developments prescribed for the purpose of section 26(1) of the 2011 Act. The consultation outlines a series of questions relating to proposals to amend the classes of development and their thresholds and criterion as set out in the *Major Development Thresholds* Schedule. The aim is to ensure they are relevant, fit for purpose and take account of future development trends.

Details of the Respondent

Q.1: Respondent Information:

Are you responding as an individual or an organisation?

Individual

☐

Organisation

☐

Please provide your organisation's name:

4 Regulations 2 and 3, and the Schedule (Major Development Thresholds) to The Planning (Development Management) Regulations (Northern Ireland) 2015

Introduction

- 4.1 Section 25 of the 2011 Act introduced a hierarchy of development within the planning system, establishing development as one of two categories, major or local. The aim of the hierarchy is to encourage a more proportionate and responsive approach to processing planning applications, with resources and decision-taking mechanisms tailored according to the scale and complexity of the proposed development³.
- 4.2 Proposals for major development, which tend to be more economically, environmentally and socially significant, are likely to require considerably more assessment and processing

³ Para 5.40 Strategic Planning Policy Statement (SPPS)

resources than local developments which, by comparison, are less complex and, on the whole, are likely to raise fewer public interest issues.

- 4.3 The Development Management Regulations set out the categories of development and the relevant thresholds or criteria for each class. The Schedule provides clarity for prospective applicants and planning authorities about which process a proposed development should follow and which developments require consultation with the community during the pre-application phase.
- 4.4 In the Development Management Regulations, there are nine classes of development identified in Column 1 of the table in the Schedule (Major Development Thresholds), each with a threshold or criterion to establish major development. They also identify thresholds or criteria for major development which may be considered regionally significant under section 26(1).

Major development

- 4.5 Major developments have important economic, social, and environmental implications for a council area. With potential to deliver important benefits for the local community, planning applications for major development will be given appropriate resources to avoid undue delay and risk to investment decisions⁴.
- 4.6 Regulation 2 of the Development Management Regulations confirms that major development is the relevant class of development which meets or exceeds the threshold or criterion outlined in Column 2 of the table in the Schedule. Planning applications for major development are submitted to the appropriate council, however they can also be called-in for determination by the Department under section 29 of the 2011 Act.
- 4.7 All major development is subject to section 27 of the 2011 Act and PACC must be undertaken prior to the submission of the planning application. In defining the classes and thresholds for major development, the aim is to achieve a balanced approach to the types of application that would most affect the community without over-burdening users of the system or the public by over-consultation.

⁴ Para 5.45 Strategic Planning Policy Statement (SPPS)

4.8 Community consultation is an essential part of an effective and inclusive planning system. The aim of PACC is to inform local communities about forthcoming development proposals, allowing them the opportunity to view and comment on the emerging design proposals, and for the developer to take any comments into consideration, before a formal planning application is submitted. The intention is to add value and improve the quality of the proposed development, by addressing community issues, improving understanding, and mitigating potential negative impacts, where possible⁵. The process aims to encourage trust and more open, positive working relationships from the earliest stages in the development management process. The Department has brought forward legislative change to the Development Management Regulations PACC provisions and procedures, which came into operation on the 1 August 2025, to allow for a dual approach to PACC which now involves:

- A statutory requirement to hold at least one in-person public community consultation event, ensuring that those who prefer or need face-to-face engagement are not excluded.
- Developers being required to provide a dedicated website to display draft proposals and collect feedback at pre-application stage.

4.9 We appreciate that not everyone has easy access to the internet, and this approach ensures that no one is left out, retaining accessibility for all, while also embracing digital tools that can broaden participation and accessibility to information to make the process more transparent and inclusive. It also brings Northern Ireland into line with other jurisdictions, such as Scotland and Wales, where digital engagement is now a core part of pre-application consultation, helping to modernise planning practice and reach a wider audience.

Major development of regional significance

4.10 Regionally significant developments form the top tier of development proposals which have a critical contribution to make to the economic and social success of Northern Ireland as a whole, or a substantial part of the region. They also include developments which potentially have significant effects beyond Northern Ireland or involve a substantial departure from a local development plan (LDP)⁶.

⁵ Development Management Practice Note 10 - <https://www.infrastructure-ni.gov.uk/publications/development-management-practice-notes>

⁶ Para 5.44 Strategic Planning Policy Statement (SPPS)

4.11 Regulation 3 of the Development Management Regulations confirms that development prescribed for the purposes of section 26(1) is major development which meets or exceeds the threshold or criterion outlined in Column 3 of the relevant class of development within the Schedule to the Development Management Regulations. Where the thresholds are met or exceeded it does not automatically equate to the application being considered regionally significant, it is a prompt to enter into consultations with the Department and follow the procedures outlined in section 26 of the 2011 Act.

4.12 Planning applications for major development deemed regionally significant⁷ are submitted to and determined by the Department. They are also subject to section 27 of the 2011 Act and require PACC.

Local development

4.13 Local developments comprise all other developments (other than permitted development⁸) that do not fall within the category of major development. The vast majority of local development proposals are for residential and minor commercial applications and are determined by councils.

Potential changes

4.14 The objective of bringing forward the proposed changes is to ensure that the classes of development and the corresponding thresholds in the Schedule remain fit for purpose and relevant for current and future development trends. The questions focus on specific proposals to amend the classes and thresholds as set out in the Development Management Regulations based on a previous public consultation and a number of tailored workshops and stakeholder events carried out by the Department.

Schedule classes and thresholds

4.15 In addition, since the Development Management Regulations were introduced in 2015, new technologies and types of development have been emerging which do not fall clearly into the current classes of development. Similarly, it is timely to evaluate whether the current thresholds are reasonable and proportionate to enable local communities to engage on

⁷ Confirmed by a notice issued under section 26(4) of the Planning Act (NI) 2011

⁸ <https://www.legislation.gov.uk/nisr/2015/70/contents/made>

complex development proposals which may impact them, whilst ensuring there is a balanced approach to timely decision-making.

- 4.16 When considering the amendments to the Schedule, and in particular the *Energy Infrastructure* class, the Department was very conscious of the speed at which technology, specifically in the renewable energy sector, has been changing. This prompted us to think about how future technologies would be captured by the present schedule. To avoid constant future amendments to accommodate new or novel technologies, it was important that the classes and descriptions were broad enough but also that they remain relevant. This also offered the opportunity to make the schedule easier to understand, require less interpretation around development types and make the screening process more transparent.

The Planning (Development Management) Regulations (Northern Ireland) 2015 Classes and Thresholds Proposed Amendments

5 Class 2 - Energy Infrastructure in the Schedule to The Planning (Development Management) Regulations (Northern Ireland) 2015.

- 5.1 The class of *Energy Infrastructure* has been largely redesigned in a move away from individually described developments and towards the fundamental purpose of the technology in question. The class includes *generation*, *storage* and *transmission*, and the types of development within that class include *heat* or *electricity generation*, and *thermal*, *electrical*, *mechanical*, or *chemical storage*. These elementary groupings are designed to ensure that whatever the development, now or in the future, it can be accommodated by the Schedule.
- 5.2 The thresholds have been considered with regard to their potential environmental, land use, safety and energy system impacts. Single, capacity-based thresholds have been used for each type of development, rather than multiple or hybrid metrics to provide consistency and in keeping with the aim of simplification.
- 5.3 The following sets out the rationale behind the proposed classifications and thresholds for energy-related development. The system is intended to:

- Provide clarity and proportionality in how energy projects are assessed;
- Ensure communities and stakeholders are appropriately consulted on developments of varying scale; and
- Create a robust, future-proof framework capable of accommodating existing and emerging renewable energy technologies.

5.4 The energy sector is undergoing rapid technological change, the proposed revised Class 2 - *Energy Infrastructure* table has been deliberately designed to be broad, flexible, and sector-agnostic, ensuring that technologies not yet widely deployed, such as next-generation batteries, advanced hydrogen systems, long-duration thermal storage, or novel renewable generation technologies, can nevertheless fit within the framework without future legislative overhaul.

5.5 *Energy infrastructure* currently incorporates several types of development including electricity generating stations, electrical power lines, storage, extraction, and pipelines. Each type of development has a different threshold for both major development and consideration as regionally significant development under section 26(1).

5.6 Whilst the growth in traditional renewable energy technologies, such as wind and solar, is likely to continue, new viable energy technologies and solutions may emerge in the coming years which merit new or adapted energy infrastructure descriptions. In tandem, it is likely that new electricity support technologies and infrastructure may also be required to support a flexible and resilient renewables-based electricity network.

5.7 The thresholds are intended to ensure that developments are classified in a way that reflects their scale, likely impacts and strategic importance, so that projects with the greatest potential impacts are subject to the appropriate level of planning scrutiny. They are primarily based on energy storage capacity Mega-watt hour ('MWh') or Giga-watt hour ('GWh'), as this provides a consistent and comparable measure of the size and contribution of different technologies, and generally correlates with physical infrastructure, land use and environmental effects. The levels have been set to strike a balance between capturing genuinely significant infrastructure as major development, while avoiding disproportionate regulation of smaller or emerging projects, and cognisant of scale in a Northern Ireland context. The approach also maintains broad consistency across different technology types, so that similar-scale developments are treated in a comparable way, while allowing for

proportionate variation where impacts arise differently, such as between above-ground and below-ground forms. It is recognised that applying a single framework across a wide and evolving range of technologies is inherently challenging, and the thresholds therefore represent a pragmatic, high-level structure designed to accommodate diverse proposals within a limited number of clear and workable categories.

Revised Classes and Thresholds - Generation

- 5.8 The first revised development type relates to *Generation* and covers any technology that produces electricity or heat, regardless of fuel source. By defining *generation* by functional output rather than technology type, the framework ensures that established technologies (wind, solar, biomass, gas and combined heat power) are captured and that emerging technologies (advanced geothermal, marine energy, hybrid renewable parks, or future net-zero fuels) are automatically included.
- 5.9 The Department proposes introducing a new description under *Generation for the construction of an onshore heat generating station*, with the proposed threshold being set at 10 Mega-watt ('MW') for Major Development and 30MW for the purpose of section 26(1) Major Development proposals.
- 5.10 The Department proposes changing the current threshold for *the construction of an onshore electricity generating station* from 5MW to 10MW for Major Development and from 30MW to 75MW for Major Developments prescribed for the purpose of section 26(1), this would include but is not limited to development related to solar PV, wind farms and geothermal.
- 5.11 For *onshore development associated with offshore electricity generating stations*, it is proposed that all such development falls within the Major Development category, with a 75MW threshold applied for classification as Major Developments prescribed for the purpose of section 26(1).
- 5.12 Using output-based definitions (e.g. "electricity-generating station" and "heat-generating station") ensures that *generation* is categorised by its functional output rather than specific technology. This means both today's technologies and tomorrow's (e.g. floating offshore wind landfall substations, new bioenergy systems, solar-thermal concentrators) are naturally included.

5.13 After considering the various responses to this question in the initial public consultation, the Department will not be bringing forward any proposals to establish a separate wind farm description under *Generation*. The Department considers the newly proposed categorisation of the development types and updated threshold parameters for *the construction of an onshore electricity generating station* will give appropriate coverage for wind farms and other development proposals.

Revised Classes and Thresholds - Energy storage

5.14 The second revised development type is *Energy storage*, and the Department proposes 4 distinct types within this description which will appropriately cater for new technologies now and in the future. The 4 proposed new energy storage types as set out below will include *thermal, electrical, mechanical* and *chemical*.

5.15 *Energy storage* is essential to renewable integration and is rapidly diversifying into thermal, electrical, mechanical, and chemical solutions. By defining storage functionally rather than technologically, the class accommodates current systems (battery energy storage, pumped heat storage, mechanical flywheels) and future innovations (including long-duration technologies such as compressed CO₂ energy storage).

Thresholds and Metrics for *Energy storage*

5.16 GWh and MWh are the preferred metrics for energy storage because they directly measure the total amount of usable energy a system can deliver, rather than its instantaneous power output. These metrics are considered to scale proportionately with the environmental and operational impacts of storage installation, such as land take, infrastructure size and safety requirements, and they also reflect the contribution the facility can make to the wider energy system in terms of duration, resilience, and flexibility. Using stored energy metrics ensures consistent comparison across different technologies, present and future, and provides a clear indicator of the strategic value of a storage project.

5.17 We propose introducing a *Thermal energy storage* description for *the development of a facility for the storage of energy in thermal form above and below ground* - this will include hot water tanks and district heat systems. Part of the rationale for this development type was to establish a meaningful measurement for the threshold. We therefore propose introducing a MWh/GWh measurement for this activity and setting a 200MWh threshold for

Major Development and a 1GWh threshold for Major Developments prescribed for the purpose of section 26(1), for above and below ground thermal energy storage facilities.

- 5.18 Under the development type of *Electricity storage* we propose introducing a description '*the development of an electricity storage facility which consists of battery energy storage*'. This threshold will also be measured in MWh/GWh and we propose a threshold of 200MWh for Major Development and a 1GWh threshold for Major Developments prescribed for the purposes of section 26(1) development proposals.
- 5.19 To be certain that all aspects of *Energy storage* are covered appropriately we propose introducing a development type *Mechanical energy storage* to cover '*development of a facility for the storage of energy in mechanical form*' which would include development for flywheels, pumped hydro and compressed air energy storage, again we propose measuring the threshold in MWh/GWh and the Major Development threshold will be set at 200MWh with the Major Developments prescribed for the purposes of section 26(1) threshold being set at 1GWh.
- 5.20 We also propose introducing a *Chemical energy storage* description '*installations for the above and below ground storage of energy in chemical form*'. The proposal is to be measured in stored energy capacity with the threshold in MWh/GWh. The threshold for **above ground** major development will be set at a stored energy capacity of 1GWh for Major Development and 5GWh for Major Developments prescribed for the purposes of section 26(1) development proposals, while **underground** chemically stored energy capacity will be set at 500MWh for Major Development and 2GWh for Major Developments prescribed for the purposes of section 26(1). Lower thresholds for underground storage reflect the additional geotechnical, groundwater and long-term containment considerations associated with subsurface development, which may give rise to significant planning impacts at comparatively smaller scales.
- 5.21 Energy storage descriptions (*thermal, electrical, mechanical, and chemical*) are internationally recognised classifications. Treating energy storage in this way ensures the framework remains relevant as new storage chemistries and long-duration solutions become commercially viable.

Revised Classes and Thresholds – Transmission and distribution

5.22 Under the *Energy infrastructure* class we will also propose maintaining the development type ‘electrical power lines and pipelines’, but with a new heading under *Transmission and distribution* with no proposed changes to the current thresholds or descriptions.

Additional information

5.23 Part of the overall proposals includes the transfer of the *Extractive* development classification from Class 2 *Energy Infrastructure* to the Class 5 *Extractive Industry*; this matter will be covered as part of question 5.

5.24 In arriving at these proposals the Department has carefully considered all the responses to the initial public consultation, along with other information gathering exercises and specific discussions with key stakeholders.

5.25 Table 1 below sets out the proposed changes to the Major Development Thresholds for Class 2 Energy Infrastructure.

Table 1.

SCHEDULE

Major Development Thresholds - Class 2 Energy Infrastructure

<i>Description of Development</i>	<i>Major Developments Threshold or Criteria</i>	<i>Major Developments prescribed for the purpose of section 26(1) of the Planning Act (Northern Ireland) 2011</i>
2. Energy Infrastructure - Generation		
Heat generating stations The construction of an on-shore heat generating station (when constructed or extended).	Where its capacity is or exceeds 10 megawatts.	Where its capacity is or exceeds 30 megawatts.
Electricity generating stations The construction of an on-shore electricity generating station (when constructed or extended).	Where its capacity is or exceeds 10 megawatts.	Where its capacity is or exceeds 75 megawatts.
Onshore development associated with the construction of an off-shore electricity generating station	All proposals.	Where its capacity is or exceeds 75 megawatts.
Energy Infrastructure - Storage		
Thermal Energy Storage The development of a facility for the storage of energy in thermal form above or below ground	Where its capacity is or exceeds 200 megawatt-hours.	Where the total maximum stored thermal energy capacity exceeds 1 gigawatt-hour.
Electricity Storage* The development of an electricity storage facility which consists of Battery Energy Storage	Where its capacity is or exceeds 200 megawatt-hours.	Where the rated energy storage capacity exceeds 1 gigawatt-hour.
Mechanical Energy Storage The development of a facility for the storage of energy in mechanical form	Where its capacity is or exceeds 200 megawatt-hours.	Where the maximum stored mechanical energy capacity exceeds 1 gigawatt-hour.
Chemical Energy Storage Installations for the above ground storage of energy in chemical form (Excluding Battery Energy Storage)	Where its stored energy capacity is or exceeds 1 gigawatt-hour.	Where the total maximum energy content of stored materials exceeds 5 gigawatt-hours.
Installations for the below ground storage of energy in chemical form (Excluding Battery Energy Storage)	Where its stored energy capacity is or exceeds 500 megawatt-hours.	Where the total maximum energy content of stored substances exceeds 2 gigawatt-hours.
Energy Infrastructure - Transmission / distribution		
Pipelines Pipelines for the transport of gas/oil/chemicals or for the transport of carbon dioxide streams for the purposes of geological storage, including associated booster stations	With a diameter of more than 400 millimetres or a length of more than 20 kilometres.	With a diameter of more than 800 millimetres or a length of more than 40 kilometres.
Electrical power lines The installation of an electrical power line.	Where the voltage exceeds 33 kilovolts if the purpose of the line is the provision of a supply to more than one customer.	Where the voltage: -is 110 kilovolts double circuit overhead line; or -is or exceeds 275 kilovolts, and a length of more than 15 kilometres.

* Definition in the regulations to be finalised.

Q.2: Do you agree with the amendment proposals outlined in Class 2 - Energy Infrastructure to the Schedule of the Development Management Regulations?

Yes ☐ No ☐

If no, please outline suggestions for change and explain your reasoning.

6 Class 3 - Transport Infrastructure in the Schedule to The Planning (Development Management) Regulations (Northern Ireland) 2015.

- 6.1 The *Transport infrastructure* class covers the construction of new or replacement railway lines, airport runways, port and harbour installations, waterways and transit ways. There have been no proposed changes to the current thresholds for Major Development or Major Developments prescribed for the purpose of section 26(1) for this class. However, we have taken the opportunity to separate the various sub-classes and change the format, setting out the unique thresholds to the various descriptions under this class.
- 6.2 Table 2 below sets out the proposed changes to the Major Development Thresholds for Class 3 Transport Infrastructure.

Table 2.

SCHEDULE

Major Development Thresholds – Class 3 Transport Infrastructure

<i>Description of Development</i>	<i>Major Developments Threshold or Criteria</i>	<i>Major Developments prescribed for the purpose of section 26(1) of the Planning Act (Northern Ireland) 2011</i>
3. Transport infrastructure. Construction of new or replacement:		
a) Railway Lines	The area of works is or exceeds 1 kilometre in length or 1 hectare.	a) Lines for long-distance railway traffic
b) Airport Runways	The area of works is or exceeds 1 kilometre in length or 1 hectare	b) the runway length is or exceeds 2100 metres
c) Port and Harbour Installations	The area of works is or exceeds 1 kilometre in length or 1 hectare	c) trading ports, piers for loading and unloading connected to land and outside ports (excluding ferry piers) which can take vessels of over 1,350 tonnes.
d) Waterways and transit ways	The area of works is or exceeds 1 kilometre in length or 1 hectare	d) Inland waterways and ports for inland waterway traffic which permit the passage of vessels of over 1,350 tonnes.

Q.3: Do you agree with the amendment proposals outlined in Class 3 - Transport Infrastructure to the Schedule of the Development Management Regulations?

Yes ☐ No ☐

If no, please outline suggestions for change and explain your reasoning.

7 Class 4 - Waste Infrastructure in the Schedule to The Planning (Development Management) Regulations (Northern Ireland) 2015.

- 7.1 Class 4 of the Schedule to the Development Management Regulations covers development and construction of facilities related to waste infrastructure for the purpose of waste management, treatment or disposal and also waste water treatment plants.
- 7.2 The Development Management Regulations prescribe a Major Development threshold for installations for the disposal, treatment or recovery of hazardous waste with a capacity for an annual intake of more than 25,000 tonnes. The Department proposes removing this threshold and instead requiring consultation with the Department for all development proposals within this class. However, the Department proposes no change to the separate threshold for Major Development prescribed for the purposes of section 26(1), under which an installation for the disposal, treatment or recovery of hazardous waste with a capacity for an annual intake of or more than 100,000 tonnes is treated as a development of regional significance.
- 7.3 The Development Management Regulations prescribe a Major Development threshold for waste disposal installations for the incineration or chemical treatment (as defined in Annex I to Directive 2008/98/EC under heading D9) of non-hazardous waste with a capacity exceeding 100 tonnes per day. The Regulations also prescribe for the purposes of section 26(1), a threshold for waste disposal installations for the incineration or chemical treatment of non-hazardous waste with a capacity for an annual intake exceeding 100,000 tonnes. The Department proposes changing the Major Development threshold from 100 tonnes per day to a capacity for an annual intake exceeding 25,000 tonnes. No change is proposed to the threshold prescribed for the purposes of section 26(1). The Department also proposes changing the description of the class to include landfill of non-hazardous waste.
- 7.4 Table 3 below sets out the proposed changes to the Major Development Thresholds for Class 4 Waste Infrastructure.

Table 3.

SCHEDULE

Major Development Threshold – Class 4 Waste Infrastructure

<i>Description of Development</i>	<i>Major Developments Threshold or Criteria</i>	<i>Major Developments prescribed for the purpose of section 26(1) of the Planning Act (Northern Ireland) 2011</i>
4. Waste infrastructure.		
Construction of facilities for use for the purpose of waste management, disposal, recovery, or treatment.	Any proposal for hazardous waste.	Where the annual intake capacity of hazardous waste exceeds 100,000 tonnes per annum.
Waste disposal installations for the incineration or chemical treatment (as defined in Annex I to Directive 2008/98/EC under heading D9(5)) or landfill of non-hazardous waste (as defined in regulation 6 of the Hazardous Waste Regulations (Northern Ireland) 2005).	Where the annual intake capacity of non-hazardous waste exceeds 25,000 tonnes per annum.	Where the annual intake capacity of non-hazardous waste exceeds 100,000 tonnes per annum.
Waste water treatment plants	With a capacity exceeding 50,000 population equivalent.	With a capacity exceeding 150,000 population equivalent as defined in Article 2 point (6) of Directive 91/271/EEC(5).

Q.4: Do you agree with the amendment proposals outlined in Class 4 - Waste Infrastructure to the Schedule of the Development Management Regulations?

Yes ☐ No ☐

If no, please outline suggestions for change and explain your reasoning.

8 Class 5 - Extractive Industry in the Schedule to The Planning (Development Management) Regulations (Northern Ireland) 2015.

- 8.1 The Department proposes re-formatting this Class by firstly changing the Class title from *Minerals* to *Extractive Industry*, along with reformatting the layout and descriptions. The proposals also include the introduction of a new subclass of *Exploration or extraction of geothermal energy* as well as the transfer of the *Extraction* subclass from Class 2 *Energy Infrastructure* to the newly titled Class 5 *Extractive Industry*.
- 8.2 While the layout of the subclasses for *Quarries and Open Cast Mining*, *Peat Extraction* and *Underground Mining* has been updated the Department proposes no changes to the thresholds for either Major Development or Major Development prescribed for section 26(1).
- 8.3 The Department proposes adding an additional subclass for the *Exploration and extraction of geothermal energy* to Class 5 *Extractive Industry*, and establishing a Major Development threshold for drilling of 200m and setting the threshold at 500m for Major Developments prescribed for section 26(1) development proposals.
- 8.4 The Department also proposes transferring the *Extraction* subclass from Class 2 *Energy Infrastructure* to the Class 5 *Extractive Industry* class under the heading *Petroleum and Natural Gas*. Both Major Development and section 26(1) development proposals will be categorised as any proposal relating to the exploration or extraction of hydrocarbons, with the Department being consulted on all development proposals under this class, this is considered a more appropriate fit for this type of development.
- 8.5 Table 4 below sets out the proposed changes to the Major Development Thresholds for Class 5 Extractive Industry.

Table 4.

SCHEDULE

Major Development Thresholds - Class 5 Extractive Industry

<i>Description of Development</i>	<i>Major Developments Threshold or Criteria</i>	<i>Major Developments prescribed for the purpose of section 26(1) of the Planning Act (Northern Ireland) 2011</i>
5. Extractive Industry		
Quarries and Open Cast Mining	The area of the site is or exceeds 2 hectares.	The area of the site exceeds 25 hectares.
Peat Extraction	The area of the site is or exceeds 2 hectares.	The area of the site exceeds 150 hectares.
Underground Mining	The area of the site is or exceeds 2 hectares.	The area of the site is or exceeds 2 hectares.
Exploration or extraction of Geothermal Energy	Where the drilling is or exceeds 200m	Where the drilling is or exceeds 500m
Petroleum and natural gas	Any proposal relating to the exploration or extraction of hydrocarbons.	Any proposal relating to the exploration or extraction of hydrocarbons.

Q.5: Do you agree with the amendment proposals outlined in Class 5 - Extractive Industry to the Schedule of the Development Management Regulations?

Yes ☐ No ☐

If no, please outline suggestions for change and explain your reasoning.

9 Class 8 - Business, Industry, Storage and Distribution in the Schedule to The Planning (Development Management) Regulations (Northern Ireland) 2015.

- 9.1 We propose introducing a sub-class to Class 8 Business, Industry, Storage and Distribution for carbon capture installations as these installations are often associated with industrial activities. Carbon capture and storage (CCS) is a process by which carbon dioxide (CO₂) from industrial installations and other large-scale emission sources is separated before it is released into the atmosphere, then transported to a long-term storage location. The CO₂ is captured from a large point source, such as power stations, cement or steel plants, or natural gas processing facilities and is typically stored in a deep geological formation. Where the captured CO₂ is used, for example in enhanced oil recovery, the process is more accurately described as carbon capture, utilisation and storage (CCUS), which is a broader term that encompasses CCS and the utilisation of captured CO₂.
- 9.2 Table 5 below sets out the proposed changes to the Major Development Thresholds for Class 8 Business, Industry, Storage and Distribution.

Table 5.

SCHEDULE

Major Development Thresholds - Class 8 Business, Industry, Storage and Distribution

<i>Description of Development</i>	<i>Major Developments Threshold or Criteria</i>	<i>Major Developments prescribed for the purpose of section 26(1) of the Planning Act (Northern Ireland) 2011</i>
8. Business, Industry (Light and General), Storage and Distribution		
According to Part B of the Schedule to the Planning (Use Classes) Order (Northern Ireland) 2015.	a) development that comprises 5,000 sq metres or more gross floorspace; or b) the area of the site is or exceeds 1 hectare.	
Carbon Capture Installations	Any proposals related to the underground storage / sequestration of carbon.	Any proposals related to the underground storage / sequestration of carbon.

Q.6: Do you agree with the amendment proposals outlined in Class 8 - Business, Industry, Storage and Distribution to the Schedule of the Development Management Regulations?

Yes ☐ No ☐

If no, please outline suggestions for change and explain your reasoning.

10 Class 9 - Any Other Development in the Schedule to The Planning (Development Management) Regulations (Northern Ireland) 2015.

10.1 The Department proposes the following amendment to the Class 9 *All other development* narrative as follows – ‘*Development not falling within any class or sub-class of development described in Parts 1 – 8 above*’. This removes the words “wholly” and “single” from the class description to clarify the requirement and the threshold.

10.2 Table 6 below sets out the proposed changes to the Major Development Thresholds for Class 9 All other Development.

Table 6.

SCHEDULE

Major Development Thresholds - Class 9 All Other Development

<i>Description of Development</i>	<i>Major Developments Threshold or Criteria</i>	<i>Major Developments prescribed for the purpose of section 26(1) of the Planning Act (Northern Ireland) 2011</i>
9. All other development.		
Development not falling within any class or sub-class of development described in Parts 1 to 8 above.	a) development that comprises 5,000 sq metres or more gross floorspace; or b) the area of the site is or exceeds 1 hectare.	

Q.7: Do you agree with the amendment proposals outlined in Class 9 - All Other Development to the Schedule of the Development Management Regulations?

Yes ☐ No ☐

If no, please outline suggestions for change and explain your reasoning.

11 Draft Statutory Rule amending The Planning (Development Management) Regulations (Northern Ireland) 2015

STATUTORY RULES OF NORTHERN IRELAND

2026 No.

PLANNING

The Planning (Development Management) (Amendments) Regulations (Northern Ireland) 2026

Made - - - - - ***

Coming into Operation - - - - - ***

The Department for Infrastructure, in exercise of the powers conferred by sections 25(2), and 247(1) and (6) of the Planning Act (Northern Ireland) 2011⁽⁹⁾ makes the following Regulations.

Citation, commencement

1.—(1) These Regulations may be cited as the Planning (Development Management) (Amendments) Regulations (Northern Ireland) 2026 and come into operation on *****.

Amendment to the Planning (Development Management) Regulations (Northern Ireland) 2015

2. — (1) In regulation 3(b) after “5” insert “and 8”.

(2) Substitute the Schedule (Major Development Thresholds) to the Planning (Development Management) Regulations (Northern Ireland) 2015 as set out in these regulations.

Sealed with the Official Seal of the Department for Infrastructure on XXXX



Rosemary Daly
A senior officer of the
Department for Infrastructure

⁽⁹⁾ 2011 c.25 (NI)

SUBSTITUTION OF THE SCHEDULE TO THE PLANNING (DEVELOPMENT MANAGEMENT)
REGULATIONS (NORTHERN IRELAND) 2015

“SCHEDULE

Regulations 2 and 3

Major Development Thresholds

1. In the Table below –

“airport” means an airport which complies with the definition in the 1944 Chicago Convention setting up the International Civil Aviation Organisation (Annex 14)⁽¹⁰⁾,

“area of works” includes any area occupied by apparatus, equipment, machinery, materials, plant, spoil heaps or other facilities or stores required for construction or installation;

“floorspace” means floorspace in a building or buildings,

“electricity storage” means a facility that stores electricity within electrochemical battery systems for subsequent discharge as electricity.

2. The Table below sets out the classes of development belonging to the category of major development.

<i>Description of Development</i>	<i>Major Developments Threshold or Criteria</i>	<i>Major Developments prescribed for the purpose of section 26(1) of the Planning Act (Northern Ireland) 2011</i>
1. EIA development.	Development of a description in paragraph; 1, 3, 4, 5, 6, 11, 12, 15, 17, 18, 19, 22, 23, and 24; mentioned in Schedule 1 to The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017.	Development of a description in paragraph 1, 3, 22, 23 and 24 mentioned in Schedule 1 to The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017.
2. Energy infrastructure.		
Generation:		
<u>Heat generating stations</u> The construction of an on-shore heat generating station (when constructed or extended).	Where its capacity is or exceeds 10 megawatts.	Where its capacity is or exceeds 30 megawatts.
<u>Electricity generating stations</u> The construction of an on-shore electricity generating station (when constructed or extended).	Where its capacity is or exceeds 10 megawatts.	Where its capacity is or exceeds 75 megawatts

Onshore development associated with the construction of an off-shore electricity generating station.	All proposals.	Where its capacity is or exceeds 75 megawatts.
Energy Storage:		
<u>Thermal Energy Storage</u> The development of a facility for the storage of energy in thermal form above or below ground.	Where its capacity is or exceeds 200 megawatt-hours.	Where the total maximum stored thermal energy capacity exceeds 1 gigawatt-hour.
<u>Electricity Storage</u> The development of an electricity storage facility which consists of Battery Energy Storage.	Where its capacity is or exceeds 200 megawatt-hours.	Where the rated energy storage capacity exceeds 1 gigawatt-hour.
<u>Mechanical Energy Storage</u> The development of a facility for the storage of energy in mechanical form.	Where its capacity is or exceeds 200 megawatt-hours.	Where the maximum stored mechanical energy capacity exceeds 1 gigawatt-hour.
<u>Chemical Energy Storage</u> Installations for the above ground storage of energy in chemical form (Excluding Battery Energy Storage).	Where its stored energy capacity is or exceeds 1 gigawatt-hour.	Where the total maximum energy content of stored materials exceeds 5 gigawatt-hours.
Installations for the below ground storage of energy in chemical form (Excluding Battery Energy Storage).	Where its stored energy capacity is or exceeds 500 megawatt-hours.	Where the total maximum energy content of stored substances exceeds 2 gigawatt-hours.
Transmission / distribution:		
<u>Pipelines</u>		
Pipelines for the transport of gas/oil/chemicals or for the transport of carbon dioxide streams for the purposes of geological storage, including associated booster stations.	With a diameter of more than 400 millimetres or a length of more than 20 kilometres.	With a diameter of more than 800 millimetres or a length of more than 40 kilometres.
<u>Electrical power lines</u>		
The installation of an electrical power line.	Where the voltage exceeds 33 kilovolts if the purpose of the line is the provision of a supply to more than one customer.	Where the voltage: -is 110 kilovolts double circuit overhead line; or -is or exceeds 275 kilovolts, and a length of more than 15 kilometres.

3. Transport infrastructure. <u>Construction of new or replacement:</u> a) Railway Lines b) Airport Runways c) Port and Harbour Installations d) Waterways and Transit Ways	The area of works is or exceeds 1 kilometre in length or 1 hectare. The area of works is or exceeds 1 kilometre in length or 1 hectare. The area of works is or exceeds 1 kilometre in length or 1 hectare. The area of works is or exceeds 1 kilometre in length or 1 hectare.	Lines for long-distance railway traffic. Runway length is or exceeds 2,100 metres. Trading ports, piers for loading and unloading connected to land and outside ports (excluding ferry piers) which can take vessels of over 1,350 tonnes. Inland waterways and ports for inland waterway traffic which permit the passage of vessels of over 1,350 tonnes.
4. Waste infrastructure. <u>Waste Management Facilities</u> Construction of facilities for use for the purpose of waste management, recovery, treatment or disposal. Waste disposal installations for the incineration, chemical treatment (as defined in Annex I to Directive 2008/98/EC), of the European Parliament and of the Council on waste and repealing certain directives under heading D9) or landfill of non-hazardous waste (as defined in regulation 6 of the Hazardous Waste Regulations (Northern Ireland) 2005). <u>Waste Water</u>	Any proposal for hazardous waste. Where the annual intake capacity of non- hazardous waste exceeds 25,000 tonnes per annum. Waste water treatment plants with a capacity exceeding 50,000 population equivalent.	Where the annual intake capacity of hazardous waste exceeds 100,000 tonnes per annum. Where the annual intake capacity of non- hazardous waste exceeds 100,000 tonnes per annum. Waste water treatment plants with a capacity exceeding 150,000 population equivalent as defined in Article 2 point (6) of Directive 91/271/EEC(5).
5. Extraction Industry. a) Quarries and Open Cast Mining.	The area of the site is or exceeds 2 hectares.	The surface of the site exceeds 25 hectares.

b) Peat Extraction.	The area of the site is or exceeds 2 hectares.	The surface of the site exceeds 150 hectares.
c) Underground Mining.	The area of the site is or exceeds 2 hectares.	The surface of the site is or exceeds 2 hectares.
d) Exploration or extraction of Geothermal Energy.	Where the drilling is or exceeds 200m.	Where the drilling is or exceeds 500m.
e) Petroleum and natural gas.	Any proposal relating to the exploration or extraction of hydrocarbons.	Any proposal relating to the exploration or extraction of hydrocarbons.
6. Housing. Construction of buildings, structures or erections for use as residential accommodation; includes private schemes.	a) development that comprises 50 units or more; or b) the area of the site is or exceeds 2 hectares.	
7. Retailing, Community, Recreation and Culture. (according to Parts A and D of the Schedule to the Planning (Use Classes) Order (Northern Ireland) 2015). Including cultural and community facilities, retail, leisure and entertainment development.	a) development that comprises 1,000 sq metres or more gross floorspace outside town centres; or b) the area of the site is or exceeds 1 hectare.	
8. Business, Industry (Light and General), Storage and Distribution. (according to Part B of the Schedule to the Planning (Use Classes) Order (Northern Ireland) 2015). Carbon Capture Installations	a) development that comprises 5,000 sq metres or more gross floorspace; or b) the area of the site is or exceeds 1 hectare. Any proposals related to the underground storage / sequestration of carbon.	Any proposals related to the underground storage / sequestration of carbon.
9. All other development. Development not falling within any class or sub-class of development described in Parts 1 to 8 above.	a) development that comprises 5,000 sq metres or more gross floorspace; or b) the area of the site is or exceeds 1 hectare.	

This page is intentionally left blank

Development Management Officer Report Committee Application

Summary	
Application ID: LA04/2026/0216/F	Committee Meeting Date: 15 th September 2026
Proposal: Single-storey rear extension and 2-storey rear and side extension.	Location: 1 Cricklewood Crescent, Belfast, BT9 5HD
Referral Route: Paragraph 3.8.1 of the Scheme of Delegation (request for referral of application to Committee from an Elected Member Cllr M. Murray)	
Recommendation:	Approval subject to conditions
Applicant Name and Address: Dan Clark 1 Cricklewood Crescent Stranmillis Belfast BT9 5HD	Agent Name and Address: Terry McGlinchey, Architect 2 Northland's Park Belfast BT10 0JG
Date Valid:	07 Feb 2026
Target Date:	11 th November 2026
Contact Officer:	Ciara Reville, Principal Planning Officer (Development Management)
Executive Summary: This application seeks full planning permission for a rear and side extension to the existing dwelling. The side extension and part of rear extension is proposed at 2-storey with pitched roof, with part of the rear extension being stepped down to single-storey with flat roof where it adjoins the attached dwelling (No. 3 Cricklewood Crescent). The extension walls would be finished in smooth render, with the pitched roof being slate to match the existing. The key issues relevant to consideration of the application are: • Design and impact on the character of the area • Impact on neighbouring amenity • Road safety & car parking • Matters raised in representation 13no. representations have been made from 2no. neighbouring properties, including one from a political representative on behalf of a neighbouring property. All representations object to the proposal both in its initial form, and as now proposed following the submission of amendments. The issues raised are addressed in the main report. DfI Roads has been consulted and offers no objection to the proposal subject to conditions. Having regard to the policy context, the proposal is considered acceptable and planning permission is recommended for approval. Delegated authority is sought for the Director of Planning and Building Control to finalise the wording of the conditions and deal with any other issues that arise provided that they are not substantive.	

Officer Report

1.0

PLANS

Site location plan:

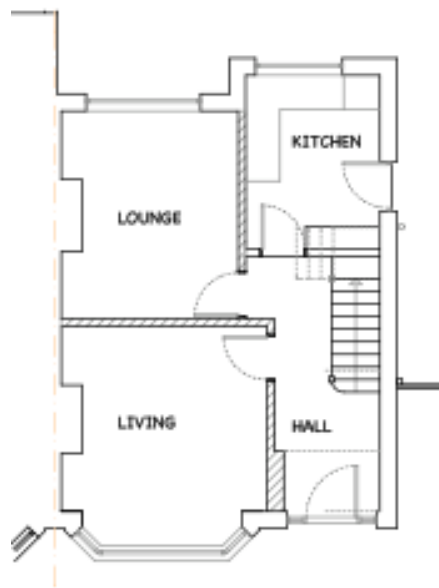


Proposed Block Plan:



[illegible][illegible]

Existing Floor Plans:

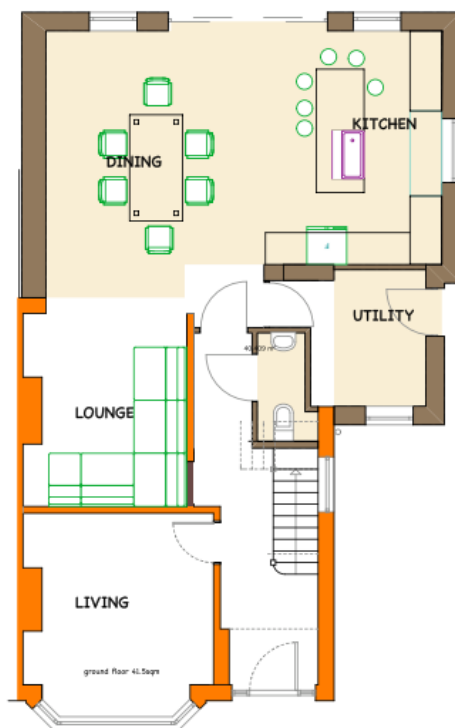


EXISTING GROUND FLOOR PLAN

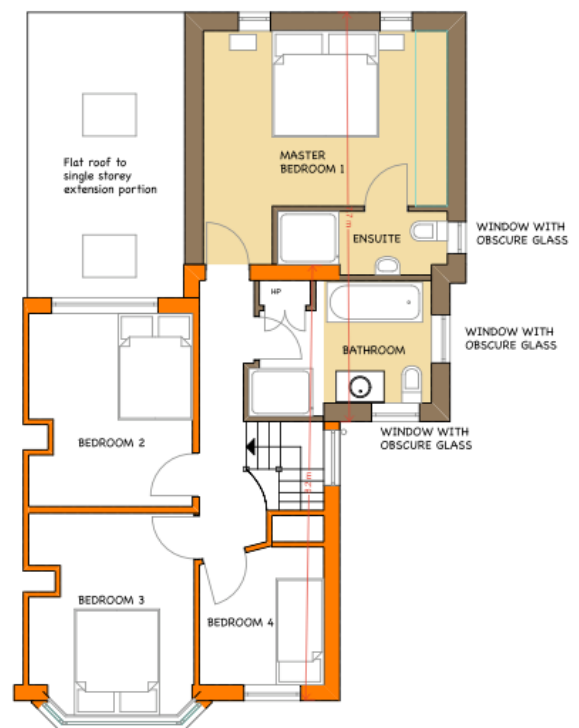


EXISTING FIRST FLOOR PLAN

Proposed Floor Plans:

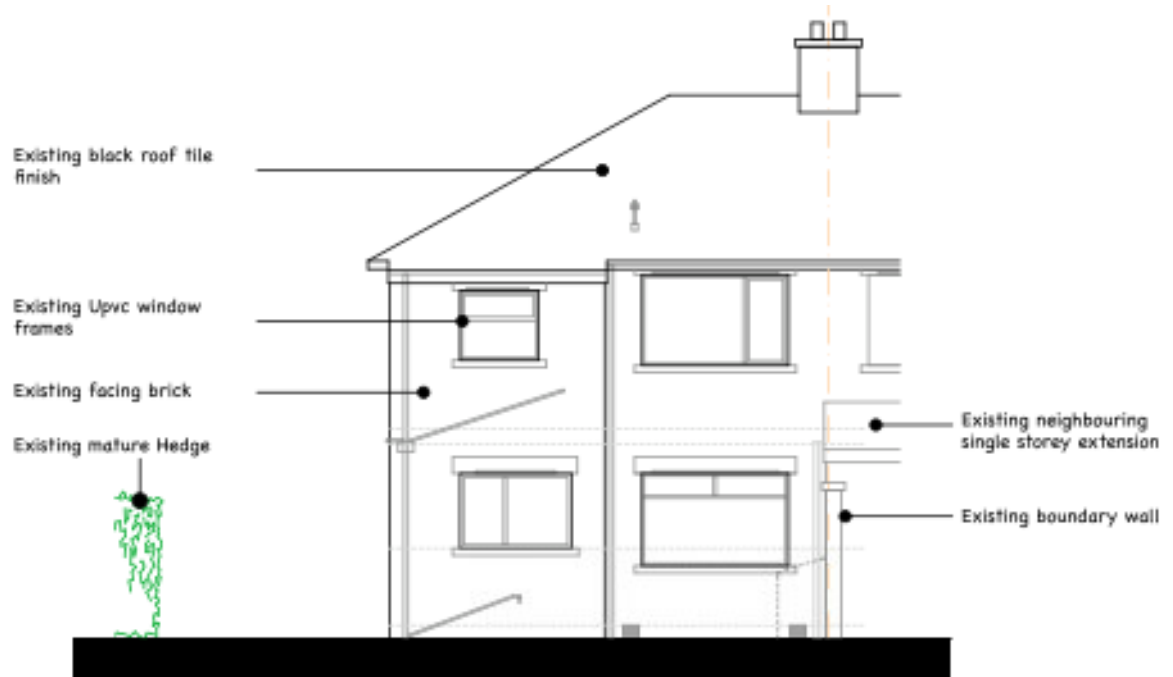


PROPOSED GROUND FLOOR PLAN

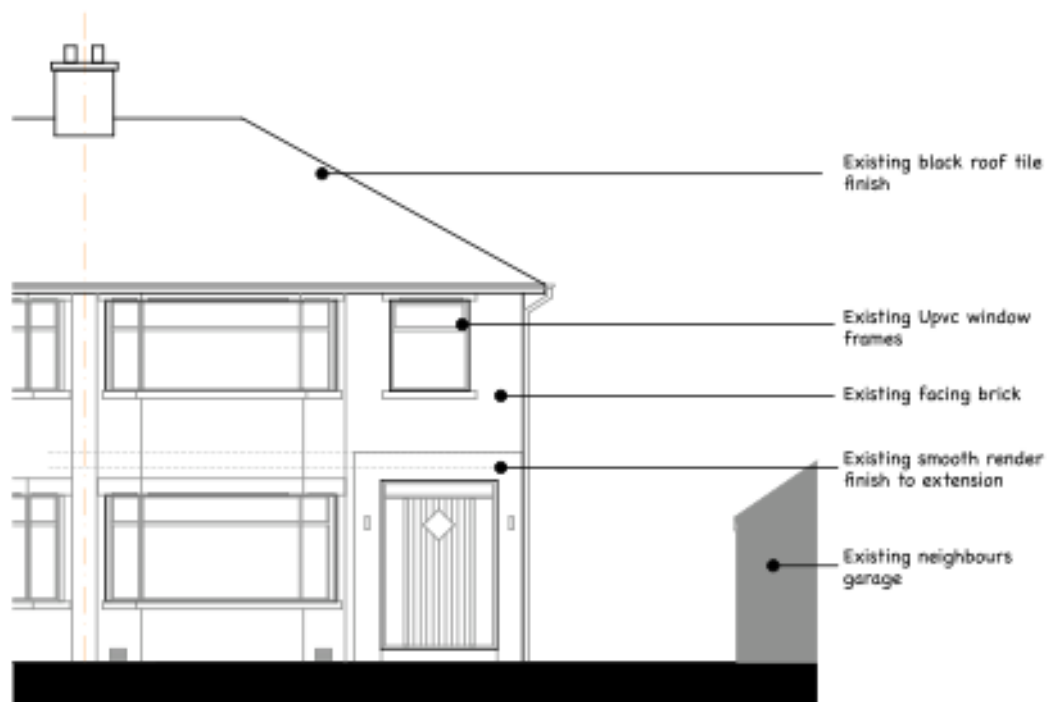


PROPOSED FIRST FLOOR PLAN

Existing Elevations:



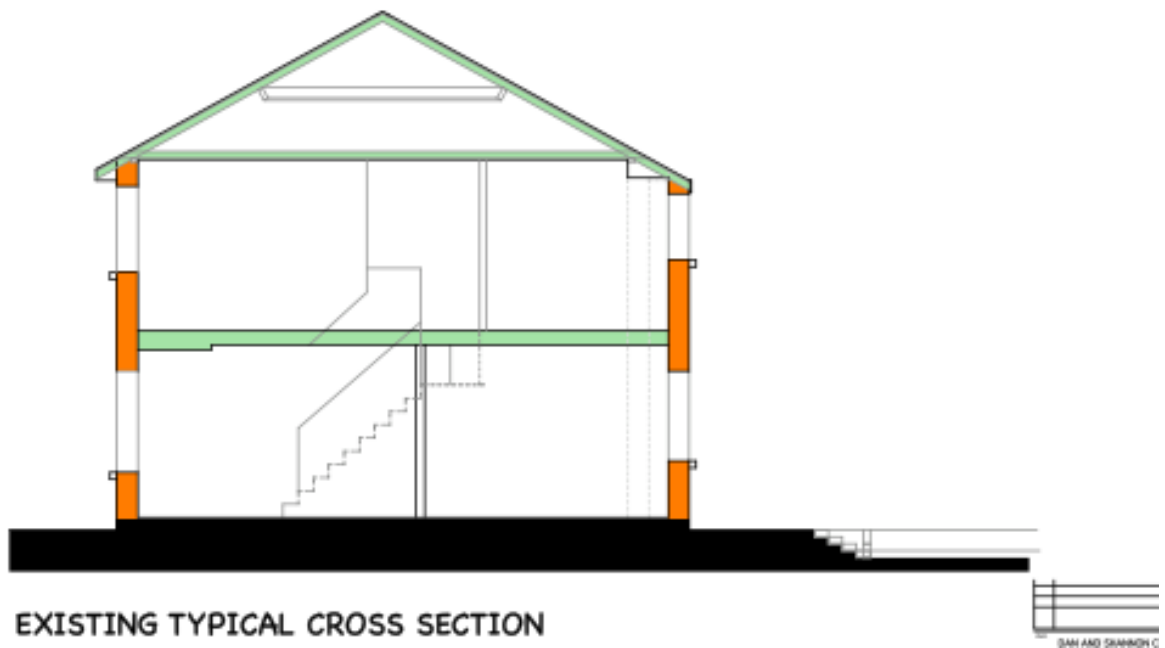
EXISTING REAR ELEVATION



EXISTING FRONT ELEVATION



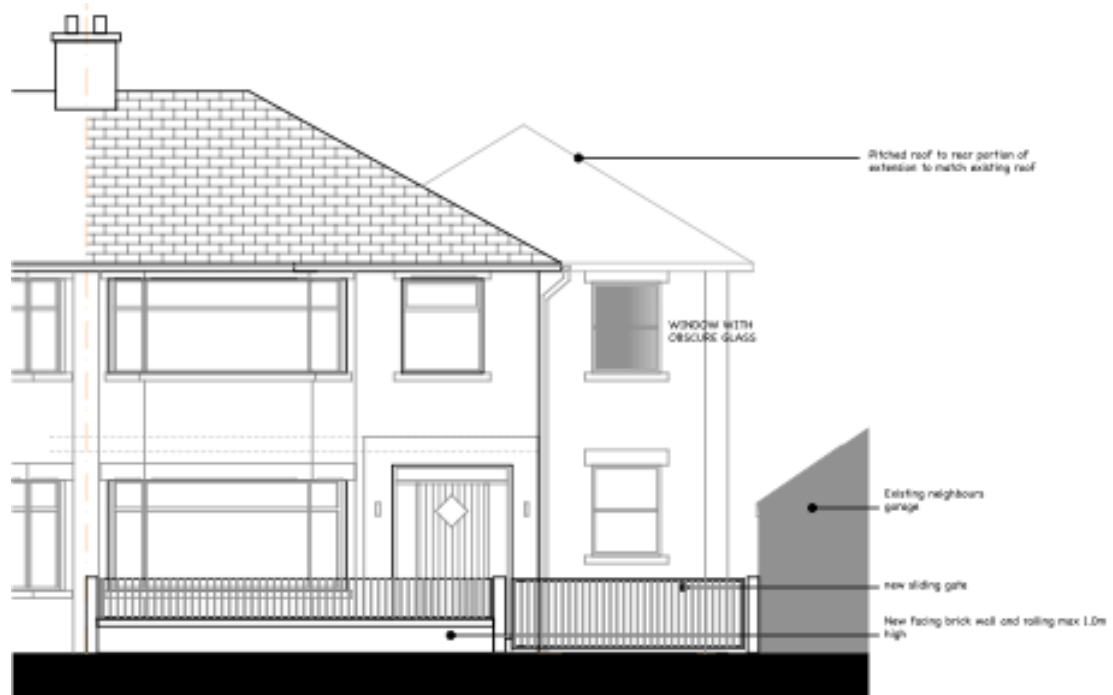
EXISTING SIDE ELEVATION



EXISTING TYPICAL CROSS SECTION

DAW AND SHANBON C

Proposed Elevations:



PROPOSED FRONT ELEVATION



PROPOSED REAR ELEVATION

	approximate scale of existing garage to 52 Cricklewood park shaded grey Roof finish to match existing Upvc double glazed windows External smooth render finish to complete rear extension WINDOW WITH OBSCURE GLASS WINDOW WITH OBSCURE GLASS approximate scale of existing mature hedge shaded green PROPOSED SIDE ELEVATION (south facing) Roof finish to match existing External smooth render finish to complete rear extension Flat roof to rear single storey extension New facing brick to new external wall of single storey extension on boundary to reduce future maintenance requirements Existing timber boundary fence PROPOSED SIDE ELEVATION FROM ADJOINING NEIGHBOUR (north facing)
2.0	Characteristics of the Site and Area
2.1	The application relates to No. 1 Cricklewood Crescent, which comprises a semi-detached, 2-storey dwelling finished in red brick with a detached garage to the rear. To the front of the property is a gravel area with tarmac hardstanding, extending down the side of dwelling. To the rear of the site is an area of private amenity garden space, with the site benefitting from mature hedging to the south facing side boundary and the east facing rear boundary.
2.2	The prevailing character of the area is predominantly residential in nature of mainly semi-detached houses that are finished in brick with small front gardens and areas of hardstanding and amenity space to the rear. A number of dwellings in the vicinity have benefitted from side/rear/roofscape extensions of differing scales over a number of years.

3.0	Description of Proposal
3.1	The application seeks full planning permission for a side and rear 2-storey extension with part rear extension single-storey only. The extension would allow for interior reconfiguration to form a new kitchen/dining area and utility at ground floor level with a new bathroom, bedroom and en-suite at first floor level.
4.0	Planning Policy and Other Material Considerations
4.1	Development Plan – operational policies Belfast Local Development Plan, Plan Strategy 2035
4.2	Development Plan – zoning, designations and proposals maps Belfast Urban Area Plan (2001) BUAP Draft Belfast Metropolitan Area Plan 2015 (v2004) Draft Belfast Metropolitan Area Plan 2015 (v2014)
4.3	Regional Planning Policy Regional Development Strategy 2035 (RDS) Strategic Planning Policy Statement for Northern Ireland (SPPS)
4.4	Other Policies Residential Extensions & Alterations Supplementary Planning Guidance (SPG) Creating Places (DfI)
4.5	Relevant Planning History There is no planning history relevant to this application.
5.0	Consultations and Representations
	Statutory Consultations
5.1	DfI Roads – No objection subject to condition.
5.2	Initially, DfI Roads considered that acceptable access and parking arrangements had not been demonstrated. Amended plans have since been received; DfI Roads have considered the amendments to the proposal and offer no objection.
5.3	Representations 13no. representations have been received from 2no. neighbouring properties, including one from a political representative on behalf of a neighbouring property. The issues raised are considered and addressed in full in the report.

6.0	PLANNING ASSESSMENT
6.1	Development Plan Context
6.2	Section 6(4) of the Planning (Northern Ireland) Act 2011 states that in making any determinations under the Act, regard is to be had to the local development plan, and the determination must be made in accordance with the plan unless material considerations indicate otherwise.
6.3	Section 45(1) of the Act states that in determining planning applications, the Council must have regard to the local development plan, so far as material to the application, and to any other material considerations.
6.4	The Development Plan is the Belfast Local Development Plan, which replaces the Belfast Urban Area Plan 2001 as the statutory plan for the city. The Belfast LDP is in two parts: Part 1 is the Plan Strategy, which was adopted on 02 May 2023. Part 2 is the Local Policies Plan, which will provide the zonings and proposals map for Belfast and has yet to be published.
6.5	Operational policies – the Plan Strategy contains a range of operational policies relevant to consideration of the application. These are listed below: • DES1 – Design • RD2 – Residential Extensions & Alterations • ENV2 and ENV3 – Mitigating and Adapting to Environmental Change • ENV5 – Sustainable Drainage Systems (SuDS) • TRAN6 – Access to public roads • TRE1 – Trees
6.6	Proposals Maps – until such time as the Local Policies Plan is adopted, the Council must have regard to the land-use zonings, designations and proposals maps in the Belfast Urban Area Plan 2001, both versions of the draft Belfast Metropolitan Area Plan (v2004 and v2014) (draft BMAP 2015) and other relevant area plans. The weight to be afforded to these proposals maps is a matter for the decision maker. It is considered that significant weight should be given to the proposals map in draft BMAP 2015 (v2014) given its advanced stage in the development process, other than policies that relate to Sprucefield, which remain contentious. Referral route
6.7	The application is referred to the Committee at the request of Councillor Murray, who refers to the representations from 54 Cricklewood Park in relation to issues including dominance, overlooking, overshadowing and loss of light.

	MAIN ASSESSMENT Key Issues
6.8	The key issues relevant to consideration of the application are: • Design and impact on the character of the area • Impact on neighbouring amenity • Road safety & car parking • Matters raised in representation Design and impact on the character of the area
6.9	Policy DES1 states that planning permission will be granted for new development that is of high quality, sustainable design that makes a positive contribution to placemaking by responding positively to local context and character.
6.10	Policy RD2 states that planning permission will be granted for extensions or alterations to an existing residential property where the scale, massing, design and external materials of the proposal are appropriate to the built form and appearance of the existing property and will not detract from the character of an established residential area.
6.11	Paragraph 4.1.1 of the Residential Extensions & Alterations Supplementary Planning Guidance (SPG) states that it is important that an extension or alteration does not upset the balance of a property, and that an extension or alteration should therefore be subordinate to the existing property in order to reduce the visual impact of the additional element and that ideally, the depth should be no greater than the depth of the side elevation of the existing property.
6.12	Paragraph 4.1.4 states that the council will expect extensions to be <i>i. Set back from the front of the house by 500mm; and</i> <i>ii. Set down from the existing roofline by 500mm; with</i> <i>iii. At least 1m separation from plot boundary in the case of side extensions.</i> This will allow sufficient space for maintenance and rear access and also limit the 'terracing effect'.
6.13	Paragraph 4.1.10 of the SPG states that a side extension is a practical way to extend a house, where there is sufficient space to do so, and provided that the proposed addition does not result in a negative impact on the street scene or on the amenity and privacy of neighbouring properties.
6.14	Paragraph 4.1.17 of the SPG states that rear extensions may not always be visible from the surrounding area, but care must be taken to ensure the design quality is of a high standard and that rear extensions do not detract from the original house. Care must therefore be taken with design and detailing; and the extension should be of an appropriate length, reflecting the scale, proportion and mass of the existing property.

6.15	The side extension is set back from the front of the existing dwelling by approx. 5.2m. It projects 2m in width at the front, with a total side length of approx. 7.8m. It projects out a further 0.3m where it aligns with the existing rear elevation of the property.
6.16	To the rear it measures a total of 8.3m wide at ground floor level. The single-storey element measures approx. 3m wide, 5.4m long and 2.8m high. The 2-storey element would be approx. 5.3m wide, approx. 5m high to the eaves and 7m to the ridge. It would be stepped down from the existing ridge by the recommended 500mm.
6.17	The footprint of the existing ground floor covers an area of approx. 48.5sqm, and existing first floor covers approx. 48.5sqm. These are proposed to increase to approx. 96.4sqm and 80.3sqm respectively; an increase of approx. 47.5sqm to ground floor and 31.5sqm to first floor.
6.18	The material finish of the extension is to be smooth render, with the single-storey element to be finished in brick where it faces the adjoining dwelling. The roof finish on the 2-storey element is to be slate to match existing, with a flat roof with rooflights on the single-storey.
6.19	A new front boundary treatment is proposed to enclose the front of the site, by way of a low facing brick wall with railing on top, sliding access gate and metal posts at a height of 1m.
6.20	Having due regard to the application site, neighbouring properties and the prevailing character of the local area, the proposal is considered to be subordinate to the existing dwelling for the following reasons.
6.21	It is sufficiently set back from the front elevation by a distance of 5.2m and would therefore not be considered imposing or dominant in the street-scene. The depth of extension, approx. 7.8m, is less than the existing side elevation, approx. 8.2m. The eaves height on the 2-storey element would match the existing, whilst its ridgeline would be lower by 500mm.
6.22	Whilst it would for the most part be finished in smooth render, it is well set back from the street and public views would be limited to the side elevation where one enters Cricklewood Crescent from Cricklewood Park. The visual primacy of the redbrick front elevation and portion of side elevation will ensure the overall balance and character of the street scene remain. The use of white render would also help soften and reduce the visual impact of the extension, distinguishing it clearly as an extension; whereas if it were finished in red brick this would increase the visual perception of the dwelling as a whole in terms of scale and mass. It is also noted that white render is a common finish used in residential extensions and would not in itself be considered harmful to residential character. The matching roof finish allows it to remain subordinate but complementary to the existing. Furthermore, it is accepted that precedent exists across the city within residential areas for extensions to be materially different, providing they are acceptably subordinate and complementary to the host dwelling.

6.23	Existing private amenity space is approximately 142sqm. This would reduce to approx. 111sqm as a result of this proposal. If the garage was not demolished, private amenity space would measure approx. 92.5sqm. Paragraph 5.19 of the Creating Places design guide states that back garden provision/private amenity space should be around 70sqm or greater, and anything less than 40sqm would be unacceptable. Sufficient private amenity space would therefore remain on the site.
6.24	By reason of its scale massing design and external material finish, the proposal is appropriate to the built form and appearance of the existing property and will not detract from the character of the area. For these reasons, the proposal is considered to comply with Policies DES1 (design) and RD2 (residential extensions and alterations), Residential Extensions & Alterations SPG and relevant provisions of the SPPS.
6.25	Impact on Neighbouring Amenity
6.26	Policy DES1 states that planning permission will be granted for new development that is of high quality, sustainable design that makes a positive contribution to placemaking by responding positively to local context and character, ensuring no undue effect on the amenity of neighbouring properties or public spaces by minimising the impact of overshadowing and loss of daylight and ensuring that on-site vehicle parking provision and movement and any external bin storage areas do not have a negative impact at street level.
6.27	Paragraph 7.3.20 of the justification and amplification of Policy RD2 states that proposals for residential extensions must not cause unacceptable harm to local character, environmental quality or residential amenity. Particular regard should be given to spacing between buildings and safeguarding of privacy.
6.28	Paragraph 4.1.10 of the SPG states that a side extension is a practical way to extend a house, where there is sufficient space to do so, and provided that the proposed addition does not result in a negative impact on the street scene or on the amenity and privacy of neighbouring properties.
6.29	Paragraph 4.1.17 of the SPG states that it is particularly important when considering rear extensions to safeguard against any significant negative impact on neighbouring amenity, ensuring privacy and light to neighbouring properties and minimising visual intrusion.
6.30	Paragraph 4.1.20 of the SPG states that care must also be taken to avoid overlooking and it is also preferable that side walls of extensions should be of a solid finish. Where windows facing a shared boundary are proposed, they will only be acceptable where it can be demonstrated that there will be no negative impact on the privacy of neighbours.
6.31	Paragraph 4.1.21 of the SPG states that the use of boundary screening or obscured glazing may be acceptable to mitigate. Paragraph 4.3.6 of the SPG states that the extent to which the potential problems may arise is usually

	dependent upon the separation distance, height, depth, mass and location of an extension and window positions.
6.32	Paragraph 4.3.18 of the SPG states that dominance (in the sense of being overbearing) is the extent to which a new development adversely impinges on the immediate aspect or outlook from an adjoining property. Neighbouring occupiers should not be adversely affected by a sense of being 'hemmed in' by an extension. This can often result from the construction of a large blank wall. Dominance can be increased when the neighbouring property is at a lower ground level to the development site. Loss of light is usually a consequence of dominance.
6.33	Paragraph 4.3.19 of the SPG further goes on to say that two-storey rear extensions to semi-detached and terraced dwellings are usually very prominent when viewed from adjoining dwellings and can dominate outward views from adjoining ground floor windows, appearing excessively large and overbearing. It is appropriate, however, to take account of the prevailing local environment.
6.34	The side elevation of the rear extension, which is on the boundary with 3 Cricklewood Crescent to the north, is single-storey and flat roof finish. The adjoining property has a single-storey rear return where it abuts the application property and comes out along the boundary for approx. 1.4m at a height of 2.6m to eaves. There is also a 2.1m high wall and further 1m high fence running along the northern boundary.
6.35	Whilst the single-storey element would break the 45 degrees angles test from the adjoining habitable window, it would not be considered to a detrimental level due to its orientation at the rear and being south-east facing; sufficient sunlight and daylight will remain to neighbouring habitable rooms. It is also noted that the 2-storey element does not break the 45 degrees angles test and there are no windows proposed on the north facing elevation at ground or first floor level and therefore there is no concern of overlooking, over and above the existing situation to no. 3 Cricklewood Crescent.
6.36	2no. windows are proposed at first floor level on the rear elevation, facing east, which would serve a bedroom. The separation distance between these and habitable windows on facing dwellings to the east would be between 17m and 18.5m. Whilst Creating Places recommends 20m separation, this is a guideline and all proposals must be assessed on their individual merits and taking account of all material considerations. In this instance, when considering the distances between other properties in the vicinity, the application plot size and neighbouring plot sizes, the proposed separation would not be dissimilar or out of keeping with existing character. A mature boundary hedge and tree are also located to the rear of the site which would significantly reduce the potential for overlooking of neighbouring amenity space and ground floor windows. A condition is attached to ensure that all trees, hedging and boundary treatments are retained, and subject to this, the council is satisfied that, on balance, the proposal would not cause demonstrable harm to neighbours to the east by way of overlooking or privacy.

6.37	The side elevation to the south is staggered and a separation distance of 1m from the boundary is achieved at all times. Due to the topography of the site, the boundary runs at an angle from west to east and the separation distance increases from 1m to 1.7m at its widest point towards the rear. This is in line with the SPG recommendation for a 1m separation distance to allow for maintenance, bin storage and to limit the terracing effect.
6.38	2no. first floor windows are proposed on this elevation, which, due to the orientation of the application site and neighbouring properties, face the rear garden of 54 Cricklewood Park to the south. A door and window are also proposed to replace an existing door and 2 no. windows at ground floor level.
6.39	As above, this elevation is located approx. 1m from the boundary, and due to the mature boundary hedging which provides adequate screening, the door and window at ground floor would not cause issues of overlooking. The boundary treatment will be conditioned to ensure their retention.
6.40	The 2 no. windows at first floor level will serve the main bathroom and en-suite, and these would be fitted with obscure, opaque glazing. A condition is attached to ensure that these are implemented and retained as such, and subject to this, there would be no issues of overlooking or impact on privacy to the south from these windows.
6.41	Building Research Establishment Guidelines - Site Layout Planning for Daylight & Sunlight states that 50% of a garden must receive 2 hours of sunlight on 21st of March. Having undertaken a calculation of sunlight hours on SunCalc.org, the council is satisfied that the host and all neighbouring gardens will still receive at least 2 hours of sunlight on 50% of their garden/outdoor amenity space in light of the proposed works.
6.42	Whilst the proposal would cast a shadow to the north, this would be limited to early afternoon, and sufficient light would remain to neighbouring dwellings. It would therefore not be considered dominant or at a level which would cause detriment to neighbouring amenity. Whilst the two-storey nature may increase the visual appearance of the rear element of the property, in the absence of any significant direct or consequential impact on neighbouring properties or amenity, it would be unreasonable to require further reduction or justify refusal of the application on this aspect.
6.43	For these reasons, and subject to conditions, the proposal would not harm the amenity of adjacent and nearby properties by way of loss of privacy, dominance, overshadowing/loss of light or loss of outlook at an unacceptable level.
6.44	The proposal is therefore considered to comply with Policies RD2 (residential extensions and alterations) and DES1 (principles of urban design), Residential Extensions & Alterations SPG and relevant provisions of the SPPS.

6.45	Road Safety & Car Parking Policy TRAN6 states that planning permission will be granted for a development proposal involving direct access, onto a public road where such access will not prejudice road safety or significantly inconvenience the flow of road users.
6.46	In line with DfI Creating Places & Parking Standards, a semi-detached house should have 1no. in-curtilage space provided, with provision for a total of 2.25no. car parking spaces, including on-street parking. According to Parking Standards the standard space requirements for a car is 2.4m x 4.8m. In line with this, there is sufficient space on site to accommodate the safe parking and manoeuvring of 2no. cars, with additional provision on street. DfI Roads have been consulted in relation to parking and access arrangements as the competent authority. Whilst concerns were initially, amended plans have since been received which DfI Roads has considered and now finds acceptable.
6.47	Car parking is considered conducive and ancillary to the use of the dwelling and the proposal, as now amended, is considered acceptable as per Policy TRAN6 (access to public roads) and relevant provisions of the SPPS. A condition is attached requiring implementation of access and parking arrangements as per the amended plans. Other Considerations
6.48	The proposal would not result in an unacceptable loss of existing on-site parking spaces. Suitable provision for bin storage would remain. The proposal includes appropriate measures to enable people to stay within their own home and energy efficiency enhancements. Sufficient amenity space remains on site having regard to the location of the property. Representations
6.49	A total of 13no. representations has been made on the application from neighbouring properties and from an elected politician on behalf of a neighbour. The issues raised are summarised and addressed as follows: Ground levels not accurate on existing plans: <i>The council clarified with the applicant/agent that the levels indicated are correct. Having conducted a site visit, officers are content that the plans as submitted present an accurate representation.</i> Formal request for site visit: <i>A site visit has been undertaken by the case officer to the proposal site and neighbouring properties.</i> Overdevelopment of the site: <i>The proposal has been assessed above under relevant planning policy, guidance and having regard for all material considerations. Sufficient amenity</i>

space and parking would remain on site; separation distances are considered acceptable; and the site is of sufficient size to accommodate the proposed extension without detriment to the application site or neighbouring properties.

- **Design of rear extension detracts from original house:**

The proposed design has been assessed against policy and, subject to appropriate conditions, is considered acceptable in this instance for the reasons noted above.

- **Visual dominance, scale & mass are not subordinate:**

The extension is considered subordinate for the reasons noted in this report. The proposed height, depth and separation distances to neighbouring properties meet the policy and guidance tests. It is set back from the front elevation, set down from the ridgeline, and suitable distances from boundaries are as required. The visual impact of the two-storey element does not in itself result in any consequential impact on neighbouring amenity.

- **Material finish not in keeping, upsets balance of street scene:**

The material finish has been considered above, and whilst it is acknowledged that the surrounding area is characterised by red brick, in this instance the extension is sufficiently set back from the street scene and is located predominantly to the rear. Public views would be limited to the side elevation where one enters Cricklewood Crescent from Cricklewood Park, and it is also noted that the roof finish will match the existing. The visual primacy of the redbrick front elevation and retained portion of the side elevation will remain, and as such the visual impact would not be considered detrimental to the overall balance of the wider street scene. Furthermore, it is noted that were the proposal to be finished in red brick, this may increase the visual perception of dwelling as a whole in terms of scale and mass. The proposal is not located within a conservation area or Area of Townscape Character, and white render is not an uncommon or unsuitable material for residential extensions. Precedent exists in residential areas for a variety of material finishes providing they are complementary to the host dwelling.

- **Impact on neighbouring amenity – loss of light, skyline views & overshadowing:**

The impact on amenity, including light levels and overshadowing has been assessed above. Whilst the single storey element fails the 45 degrees angles test to the north; owing to the site orientation, existing development and boundary treatment, this would be minimal and restricted to a small portion of the day. Sufficient daylight and sunlight levels will remain, in line with BRE guidelines. Whilst the proposal would be visible from neighbouring properties, the loss of views of the skyline from gardens or windows is not a protected under planning policy and is not material planning consideration.

	Impact on neighbouring amenity – privacy/overlooking: <i>As assessed above, the side extension would not cause issues of overlooking. Ground floor level windows are screened by existing boundary treatment, which are conditioned to be retained in situ, and first floor side elevation windows will be conditioned to be obscure glazed as per the submitted plans.</i> Health impacts due to loss of amenity: <i>The proposal has been assessed in regard to neighbouring amenity and will not cause undue detriment to existing amenity provision.</i> Protection of hedging: <i>Alterations to existing hedges does not require planning permission, therefore an Arboriculture Report is not required in this instance. That being said, the proposal has been assessed as presented on the plans in regard to the site conditions, and all existing hedging and boundary treatments are conditioned to be retained to ensure adequate screening remains in situ. As per the condition, any boundary treatment that is removed during construction must be suitably replaced.</i> Issues relating to parking, access provision & pedestrian safety: <i>As noted above, DfI Roads has been consulted and, having considered the amended plans, offers no objection. Subject to condition, the proposal complies with policy in regard to both parking and access arrangements. No concerns were raised in respect of road or pedestrian safety.</i> Bin storage: <i>Bin storage and access have been assessed and are policy compliant.</i> Issues with guttering: <i>This is not a material planning consideration in the assessment of this proposal.</i>
6.50	A concern was noted in respect of the initial submission, with issues raised over the level of set back from the front elevation. Amended plans have since been submitted and the set back as now proposed, approx. 5.2m; far exceeds the minimum requirement of 500mm, and for the reasons noted is found to be acceptable.
6.51	Having considered all relevant concerns noted in the representations, officers are satisfied that the proposal complies with planning policy and that there are no material considerations in this instance that would outweigh the above policy position or justify further amendments or refusal of planning permission.

7.0	Recommendation
7.1	Having regard to the development plan and other material considerations, the proposal is considered acceptable. It is recommended that planning permission is granted subject to conditions.
7.2	Delegated authority is sought for the Director of Planning and Building Control to finalise the wording of conditions and deal with any other matters which may arise.

DRAFT CONDITIONS:

1. The development hereby permitted must be begun within five years from the date of this permission.

Reason: As required by Section 61 of the Planning Act (Northern Ireland) 2011.

2. Notwithstanding the provisions of the Planning (General Permitted Development) Order (Northern Ireland) 2015 (or any order revoking and/or re-enacting that order), the first-floor windows on the proposed side elevation serving a bathroom and en-suite as indicated on drawing no's 08C, 10D & 11A shall at all times be glazed with obscure glass to at least Pilkington Level 3 (or equivalent).

Reason: To safeguard the privacy of adjacent properties.

3. All trees, hedging and boundary treatments within the site and as indicated on the approved plans shall be retained unless shown on the approved drawings as being removed. Any trees or planting indicated on the approved drawings which, within a period of five years from the date of planting, die, are removed, or become seriously damaged, diseased, or dying, shall be replaced during the next planting season (October to March inclusive) with other trees or plants of a location, species and size to be first approved in writing by the Council.

Reason: In the interests of residential amenity and to safeguard the privacy of neighbouring properties.

4. The vehicular access shall be provided in accordance with Drawing No.07C uploaded to the Planning Portal 6th May 2026, prior to the occupation of any other works or other development hereby permitted.

Reason: To ensure there is a satisfactory means of access in the interests of road safety and the convenience of road users.

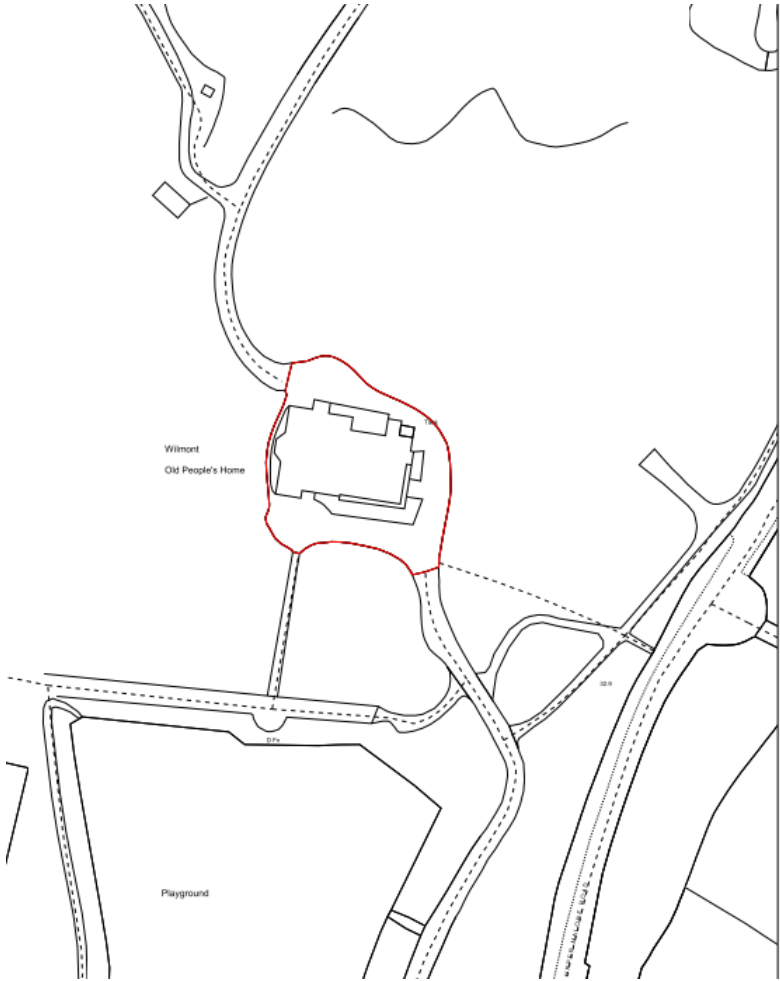
5. The development hereby permitted shall not be occupied until hard surfaced areas have been constructed in accordance with Drawing No.07C uploaded to the Planning Portal 6th May 2026 to provide for parking within the site. No part of these hard surfaced areas shall be used for any purpose at any time other than for the parking and movement of vehicles.

Reason: To ensure adequate provision has been made for parking within the site.

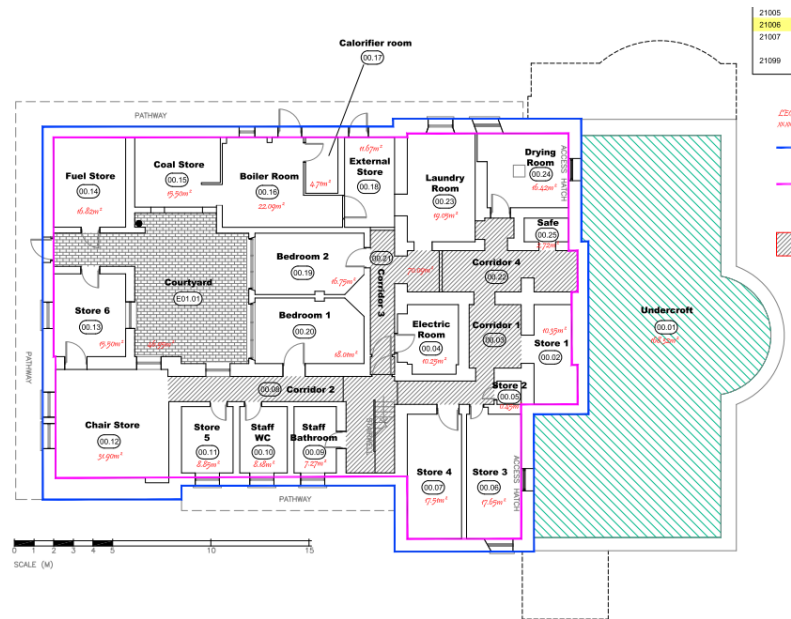
Committee Application

Development Management Report	
Committee Date: 15 th September 2026	
Application ID: LA04/2026/1207/LBC	
Proposal: Enabling works for safe access and asbestos removal to allow condition survey to occur.	Location: Wilmont House, Sir Thomas and Lady Dixon Park, 243 Upper Malone Rd, Dunmurry, Belfast, BT17 9LA
Referral Route: The application is made by Belfast City Council and on lands to which the Council has an estate (3.8.5 (c) and (d) of the Scheme of Delegation)	
Recommendation	Grant Listed Building Consent
Applicant Name and Address: Neil Gowdy Belfast City Council Property and Projects Department 9-21 Adelaide Street Belfast BT2 8DJ	Agent Name and Address: Neil Gowdy Belfast City Council Property and Projects Department 9-21 Adelaide Street Belfast BT2 8DJ
Date Valid:	29 th July 2026
Target Date:	11 th November 2026
Contact Officer:	Ciara Reville, Principal Planning Officer (Development Management)
Summary of Issues: The application seeks Listed Building Consent to accommodate enabling work for safe access to the building to allow for removal of asbestos and to allow for a condition survey to be undertaken. The site is located outside of the Settlement Development Limits for Belfast and falls within Area of Outstanding Natural Beauty Lagan Valley (AONB 1), Lagan Valley Regional Park Area (COU 9) and Lagan Valley Regional Park Node; Lady Dixon Park (CA 08). Wilmont House is a Grade B+ Listed Building, is of special architectural or historic interest and is protected by Section 80 of the Planning Act (NI) 2011. Its initial use was as a residential country home and has been used as a residential care home in the recent past but is currently derelict and unused. The key issues relevant to consideration of the application are: • Impact on the setting of Listed Buildings • Other considerations Department for Communities; Historic Environment Division was consulted on the proposal and offer no objection to the proposed works and are content with the proposal. Recommendation	

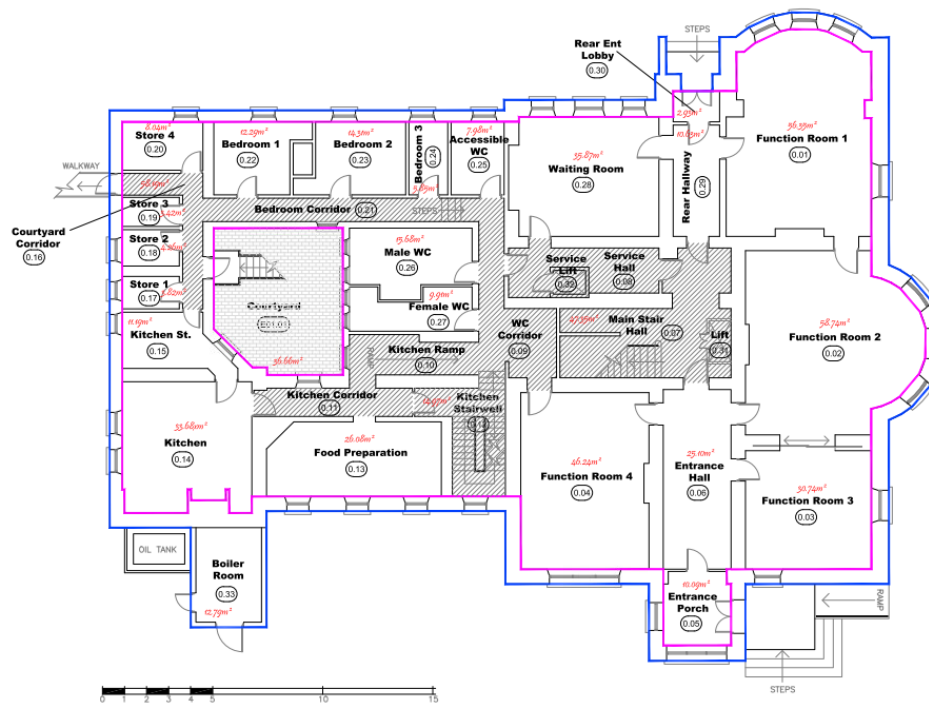
Having had regard to the development plan, relevant planning policies, and other material considerations, it is considered that the proposal should be approved. Delegated authority is sought for the Director of Planning and Building Control to finalise the conditions and deal with any other matters which may arise so long as they are not substantive.

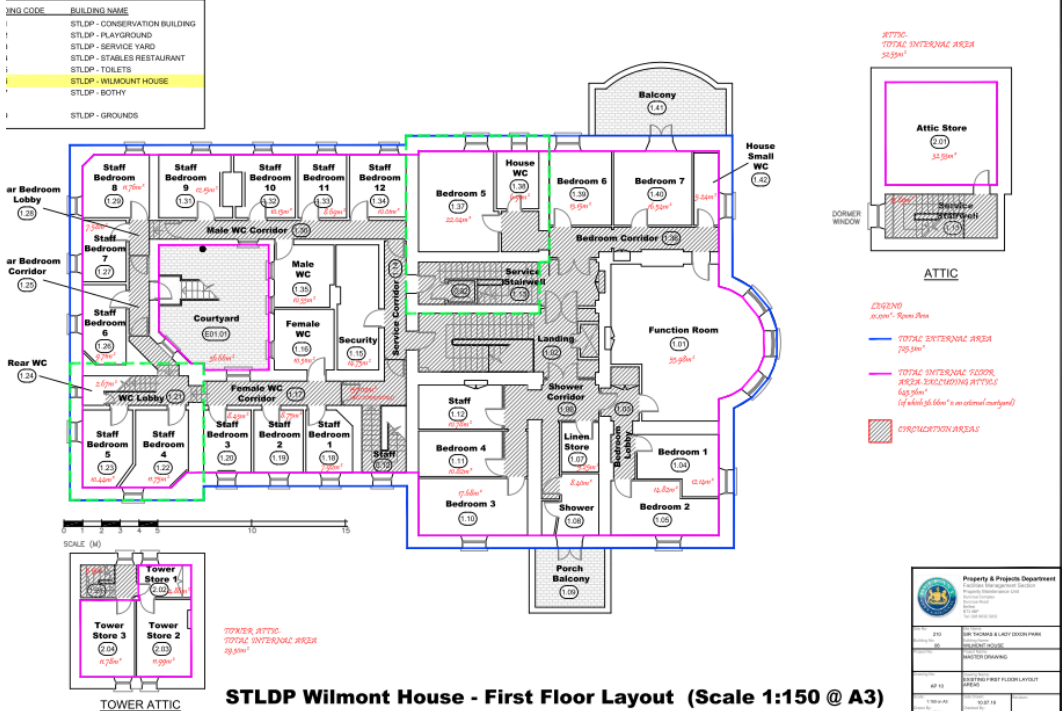
Site Visit Report	
	Site Location Plan:  The map is a line drawing showing a site location. A building complex, labeled 'Wilmont Old People's Home', is outlined in red. To the left of the building is a 'Playground'. The map includes various roads, paths, and a river or stream on the right side. There are also some smaller buildings and a wavy line representing a body of water at the top.

Basement Floor Plan



Ground Floor Plan



	First Floor Plan  STLDP Wilmont House - First Floor Layout (Scale 1:150 @ A3)
1.0 1.1 1.2	Characteristics of the Site and Area The site is located outside of the Settlement Development Limits for Belfast and falls within Area of Outstanding Natural Beauty Lagan Valley (AONB 1), Lagan Valley Regional Park Area (COU 9) and Lagan Valley Regional Park Node; Lady Dixon Park (CA 08). The wider area is countryside parkland on the outskirts of Belfast known as Sir Thomas & Lady Dixon Park. Wilmont House is a Grade B+ Listed Building, Historic Buildings Reference (HB26/16/005 A). It is of special architectural or historic interest and is protected by Section 80 of the Planning Act (NI) 2011. Its initial use was as a residential country home and has been used as a residential care home in the recent past but is currently derelict and unused. It has group value with its gate lodge (HB26/16/005 B), former stable block (HB26/16/005 C) and walled garden (HB26/16/005 D).
2.0 2.1	PLANNING HISTORY There is no relevant planning history.
3.0 3.1	PLANNING POLICY Development Plan – Belfast Local Development Plan, Plan Strategy 2035 <i>Operational Policies</i> Policy BH1 – Listed buildings

3.2	Development Plan – zoning, designations and proposals maps Belfast Urban Area Plan (2001) BUAP Draft Belfast Metropolitan Area Plan 2015 (v2004) Draft Belfast Metropolitan Area Plan 2015 (v2014)
3.3	Regional Planning Policy Regional Development Strategy 2035 (RDS) Strategic Planning Policy Statement for Northern Ireland (Edition 2, 2025) (SPPS)
4.0	CONSULTATIONS AND REPRESENTATIONS
4.1	<u>Consultations</u> Department for Communities; Historic Environment Division (HED) was consulted on the proposal. HED have confirmed they are content with the proposal and offer no objection.
4.2	<u>Representations</u> The application has been advertised on the 7th August 2026 in line with the Planning (General Development Procedure) Order (Northern Ireland) 2015. No representations were received.
5.0	PLANNING ASSESSMENT
5.1	<u>Main Issues</u> The main issues relevant to consideration of the application are set out below: • Impact on the setting of Listed Buildings • Other issues <u>Development Plan Context</u>
5.2	Section 6(4) of the Planning (Northern Ireland) Act 2011 states that in making any determinations under the Act, regard is to be had to the local development plan, and the determination must be made in accordance with the plan unless material considerations indicate otherwise.
5.3	Section 45(1) of the Act states that in determining planning applications, the Council must have regard to the local development plan, so far as material to the application, and to any other material considerations.
5.4	The Belfast Local Development Plan (LDP) when fully completed will replace the Belfast Urban Area Plan 2001 as the statutory Development Plan for the city. The Belfast LDP will comprise two parts. Part 1 is the Plan Strategy, which contains strategic and operational policies and was adopted on 02 May 2023. Part 2 is the Local Policies Plan, which will provide the zonings and proposals maps for Belfast and has not yet been published. The zonings and proposals maps in the Belfast Urban Area Plan 2001 remain part of the statutory local development plan until the Local Policies Plan is adopted.

	<u>Operational Policies</u>
5.5	The Plan Strategy contains a range of operational policies relevant to consideration of the application. These are listed at paragraph 3.2.
	<u>Proposals Maps</u>
5.6	Until such time as the Local Policies Plan is adopted, the Council must have regard to the land-use zonings, designations and proposals maps in the Belfast Urban Area Plan 2001 (BUAP), both versions of the draft Belfast Metropolitan Area Plan (v2004 and v2014) (dBMAP) and other relevant area plans. The weight to be afforded to these proposals maps is a matter for the decision maker. It is considered that significant weight should be given to the proposals map in dBMAP 2015 (v2014) given its advanced stage in the development process, save for retail policies that relate to Sprucefield which remain contentious.
5.7	It is considered that the proposal is in compliance with paragraphs 6.12-6.13 of the SPPS in that the proposed development will not cause demonstrable harm to the Listed Building.
	Impact on the setting of Listed Buildings
5.8	The application seeks consent for enabling works to remove asbestos from the listed building. Due to its derelict condition and concerns around structural integrity, access to the property is severely restricted since a previous asbestos management survey was carried out in 2015. At that time, it was noted that access to the building was considerably restricted at that time due to its condition and since then the condition of the building has further deteriorated. It has not been deemed safe to access the building adequately to carry out another asbestos survey and it is the intention of the council to engage a competent licensed asbestos removal contractor to remove all asbestos and contaminated materials within all internal ledges and surfaces of the building.
5.9	As part of this application an asbestos removal specification has been submitted along with a scope for enabling works. These documents set out a strategy for the safe removal of the asbestos, putting in place all necessary health and safety measures in order for the removal works to be undertaken. There are no interior or exterior development/construction proposals as part of this application. Listed building consent is required to authorise the removal of asbestos from the property to allow for a survey to be undertaken thereafter which will allow for any potential redevelopment works to be undertaken. Policy BH1 of the Plan strategy sets out the policy context for considering proposals to alter Listed Buildings: Criterion (f) states that consent will be granted where the works preserve, restore and complement the building's features of special architectural or historical importance to ensure the existing building remains intact and unimpaired;
5.10	It is considered that the proposal meets the above policy criteria and the historic and architectural integrity of the Listed Building would be safeguarded through this asbestos removal to allow for future redevelopment.

5.11	As noted above, HED were consulted and offered no objection. Other Considerations The setting of the building within the AONB would not be affected as the works relate to enabling works to allow for the safe removal of asbestos from the inside of the Listed Building. There are no significant construction works proposed that require further consideration.
6.0	Neighbour Notification Checked N/A
6.1	Summary of Recommendation Having regard to the development plan and other material considerations, the proposal is considered acceptable. It is recommended that Listed Building Consent is granted. Delegated authority is sought for the Director of Planning and Building Control to finalise the conditions and deal with any other matters which may arise.
	DRAFT CONDITIONS 1. The works hereby permitted shall be begun not later than the expiration of 5 years beginning with the date on which this consent is granted. Reason: As required by Section 94 of the Planning Act (Northern Ireland) 2011.

Planning Committee

Development Management Report	
Committee Date: 15 th September 2026	
Application ID: LA04/2026/0890/F	
Proposal: The proposed regeneration of an existing open space. The scheme includes permeable surfaces, Sustainable Drainage Systems (SuDS), surface water management, improved/new paths and associated landscaping works.	Location: The open space directly to the south of 2-20 Distillery Street and 9-11 Blackwater Way.
Applicant Name and Address: Belfast City Council 9 Adelaide 9-21 Adelaide Street Belfast BT2 8DJ	Agent Name and Address: Niamh Quigley Collins Rolston Architects 8th Floor, Causeway Tower 9-11 James Street South Belfast BT2 8DN
Referral Route: The application is made by Belfast City Council and on lands to which the Council has an estate (3.8.5 (a) of the Scheme of Delegation)	
Recommendation	Approval
Date Valid:	3 rd June 2026
Target Date:	16 th October 2026
Contact Officer:	Ciara Reville, Principal Planning Officer (Development Management)
Summary of Issues: The proposal seeks permission for the regeneration of an existing open space located on lands to the south of Distillery Street. The scheme includes permeable surfaces, Sustainable Drainage Systems (SuDS), surface water management, improved/new paths and associated landscaping works. The site is an area of green space of approximately 0.7hectares located to the south of Distillery Street and Blackwater way. The site is bounded to the south by a red brick wall which an interface that separates the site from the Westlink. To the south west of the site is a footpath and footbridge which connects either side of Roden Street. The main issues relevant to consideration of the application are set out below: • Principle of the Proposal • Flood Risk • Climate Change • Impact on Trees	

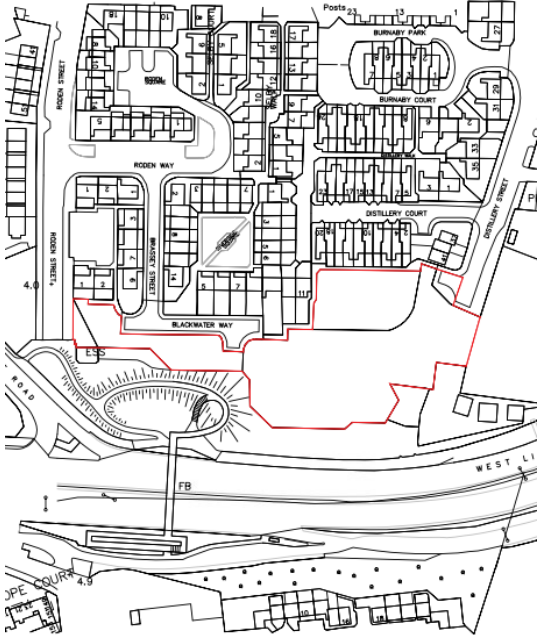
- Environmental Protection

There are no objections from consultees. There are 48 third party objections and 5 letters of support addressed within the report.

The proposal forms an enhancement of an existing open space and utilises various SuDS measures to mitigate against climate change. A Statement of Community Involvement has been submitted and demonstrates that an adequate level of consultation has taken place. The proposal does not involve the alteration of any existing peace infrastructure.

Recommendation

Having had regard to the development plan, relevant planning policies, and other material considerations, it is considered that the proposal should be approved. Delegated authority to the Director of Planning and Building Control is sought to finalise conditions.

	Case Officer Report
	Site Location Plan: 
	Proposed Site Layout: 

1.0	Characteristics of the Site and Area
1.1	The site is an area of green space of approximately 0.7hectares located to the south of Distillery Street and Blackwater way. The site is bounded to the south by a red brick wall which separates the site from the Westlink. To the south west of the site is a footpath and footbridge which connects either side of Roden Street.
2.0	PLANNING HISTORY
2.1	There is no relevant planning history.
3.0	PLANNING POLICY
3.1	Development Plan – Belfast Local Development Plan, Plan Strategy 2035 <i>Strategic Policies:</i> • Policy SP2 – Sustainable development • Policy SP3 – Improving health and wellbeing • Policy SP5 – Positive placemaking • Policy SD2 – Settlement areas <i>Operational Policies</i> • Policy CGR1- Community Cohesion and Good Relations • Policy OS1 – Protection of Open Space • Policy ENV1- Environmental Quality • Policy ENV 2- Mitigating Environmental Change • Policy ENV 3-Adapting to Environmental Change • Policy ENV 4- Flood Risk • Policy ENV 5- SuDS • Policy TRE1 – Trees
3.2	Development Plan – zoning, designations and proposals maps Belfast Urban Area Plan (2001) BUAP Draft Belfast Metropolitan Area Plan 2015 (v2004) Draft Belfast Metropolitan Area Plan 2015 (v2014)
3.3	Regional Planning Policy Regional Development Strategy 2035 (RDS) Strategic Planning Policy Statement for Northern Ireland (SPPS)
4.0	CONSULTATIONS AND REPRESENTATIONS
4.1	BCC Tree Officer- No Objections with conditions Environmental Health- No objections with conditions. DFI Rivers- No objections

4.2	<u>Representations</u> The application has been advertised and neighbour notified, 48 objections have been received and 5 letters of support. Issues raised are summarised below: • Proposal only benefits one community and not Roden/Donagall Road side of interface, therefore it is not cross community. <i>Case Officer Response: Due to the location the proposal has been assessed against the requirements of Policy CGR1 within the main report.</i> • Concerns raised in relation to a proposed gate. <i>Case Officer Response: The supporting Statement of Community Involvement states that a gate was originally part of proposals but this was removed following a community consultation.</i> • A number of representations referred to the funding of the project and that planning permission should not be granted to a scheme that fails to meet the legal conditions attached to its funding. <i>Case Officer Response: The funding of the application is not a material planning consideration, the planning department can only to assess the application before it on its merits. Conditions attached to funding is a civil matter.</i> • There has been a lack of consultation. <i>Case Officer Response: The applicant has submitted a Statement of Community Involvement in accordance with Policy CGR1. The planning department have neighbour notified in accordance with the Article 8 of The Planning (General Development Procedure) Order (Northern Ireland) 2015.</i> • Concerns relating to increased unrest and anti-social behaviour. <i>Case Officer Response: There is no evidence the proposal would lead to increase unrest and anti-social behaviour. This would be a matter for the police.</i> • Proposal will look out of place within the surrounding area: <i>Case Officer Response: The proposal enhances an area of existing open space and would not be considered to appear out of place.</i>
5.0	PLANNING ASSESSMENT <u>Main Issues</u> 5.1 The main issues relevant to consideration of the application are set out below: • Principle of the Proposal • Flood Risk • Climate Change • Impact on Trees • Environmental Protection 5.2 <u>Development Plan Context</u> Section 6(4) of the Planning (Northern Ireland) Act 2011 states that in making any determinations under the Act, regard is to be had to the local development plan, and

	the determination must be made in accordance with the plan unless material considerations indicate otherwise.
5.3	Section 45(1) of the Act states that in determining planning applications, the Council must have regard to the local development plan, so far as material to the application, and to any other material considerations.
5.4	The Belfast Local Development Plan (LDP) when fully completed will replace the Belfast Urban Area Plan 2001 as the statutory Development Plan for the city. The Belfast LDP will comprise two parts. Part 1 is the Plan Strategy, which contains strategic and operational policies and was adopted on 02 May 2023. Part 2 is the Local Policies Plan, which will provide the zonings and proposals maps for Belfast and has not yet been published. The zonings and proposals maps in the Belfast Urban Area Plan 2001 remain part of the statutory local development plan until the Local Policies Plan is adopted. <u>Operational Policies</u>
5.5	The Plan Strategy contains a range of operational policies relevant to consideration of the application. These are listed at paragraph 3.1. <u>Proposals Maps</u>
5.6	Until such time as the Local Policies Plan is adopted, the Council must have regard to the land-use zonings, designations and proposals maps in the Belfast Urban Area Plan 2001 (BUAP), both versions of the draft Belfast Metropolitan Area Plan (v2004 and v2014) (dBMAP) and other relevant area plans. The weight to be afforded to these proposals maps is a matter for the decision maker. It is considered that significant weight should be given to the proposals map in dBMAP 2015 (v2014) given its advanced stage in the development process, save for retail policies that relate to Sprucefield which remain contentious. • Belfast Urban Area Plan 2001: The site is located within whiteland. • Belfast Metropolitan Area Plan 2015 (2004): The site is within whiteland. • Belfast Metropolitan Area Plan 2015 (v2014): The site is within whiteland.
5.7	It is considered that the proposal is in compliance with the SPPS in that the proposed development will not cause demonstrable harm to interests of acknowledged importance which are considered below. Principle of Development
5.8	The proposal is within an area of open space. Policy OS1 has a general presumption in favour of retaining all such lands and uses. The proposal enhances the existing

	open space with improved footpaths, a high quality public realm including permeable paving, bench seating, rain gardens and landscaping. There is therefore no conflict with Policy OS1.
5.9	The proposed site is bounded by an interface with a 400m brick wall at a height of 3.2m running along the southern boundary of the site. Policy CGR1 provides 5 criteria for proposals at interface locations.
5.10	In terms of criteria (a) a Statement of Community Involvement has been submitted to demonstrate impacted communities were involved at the outset. Consultation events were held at Grosvenor Community Centre and St Simons Community Hub. The events were advertised on the Council website, leaflet drops were held and elected representatives and community groups were notified. An online consultation survey was held and as a result 205 responses were received online and 135 hard copies.
5.11	Criteria (b) supports initiatives towards the removal of peace infrastructure while (c) seeks to minimise infrastructure and physical barriers to maximise future connectivity. While the policy supports initiatives that result in the removal of peace infrastructure it does not preclude those that do not. The proposal will not result in additional infrastructure or alter existing access arrangements to the open space. Initial proposals included a gate to increase access to the site from both communities, however this was removed following community consultation.
5.12	Criteria (d) and (e) state that shared neighbourhood facilities and services are sited in areas that are safely accessible to all communities and public realm spaces are safe and accessible shared spaces for use by everyone. The proposal complies by improving accessibility with improved paths throughout the space, enhanced public realm and lighting to improve safety. While the accessibility to the area from both communities has not increased, this is due to responses during the consultation process.
5.13	The proposal is considered to comply with Policy CGR1
	Flood Risk
5.14	The proposal is located within the 1 in 100 year climate change fluvial flood plain. Under paragraph 6.107 built development must not be permitted within the flood plains of rivers or sea unless one of three circumstances apply. One of the three exceptions is the development constitutes a valid exception to the general presumption against development in flood plains. The Flooding SPG and SPPS outlines exceptions which includes amenity open space. The proposal is considered amenity open space and is therefore forms an exception. A Flood Risk Assessment has been submitted and DFI Rivers have responded stating they have no reason to disagree with its conclusions.
5.15	DFI Rivers have stated in their consultation response that the site is within a potential area of inundation emanating from the Springfield Reservoir. DFI Rivers have carried out an assessment of the flood risk and the overall rating is considered moderate which is considered to be an acceptable combination of depth and velocity for the general public but unacceptable for bespoke development for children, the elderly and the infirm as these groups can be more vulnerable to risks associated with flood water.

5.16	Due to the proposal being within a flood plain no bespoke childrens' play equipment has been included. Given the proposal is an upgrade of an existing open space it is not considered that there will be an increased flood risk to users over that which exists currently. The proposal is considered acceptable under Policy ENV 4. Climate Change
5.17	Policy ENV 2 states planning permission will be granted for development that incorporates measures to mitigate environmental change and reduce GHG by promoting sustainable patterns of development. ENV 3 states planning permission will be granted for development proposals that incorporates measures to adapt to environmental change, in order to support sustainable and enduring development. ENV 5 states all built development should include, where appropriate, SuDS measures to manage water effectively on site.
5.18	The proposals include SuDS measures such as a dry swale, rainwater gardens and filter drains which will aid in managing rainwater and are measures that will aid in mitigating environmental change.
5.19	DfI Rivers state that commenting on the efficiency of SuDS is outside their expertise but the Council have no reason to disagree with SuDS measures as per the drainage assessment.
5.20	The proposal complies with policies ENV 2, 3 and 5. Impact on Trees
5.21	The proposal retains the existing trees within the site. The BCC Tree Officer welcomed the retention of the trees and the proposed landscaping.
5.22	The proposal complies with Policy TRE 1. Environmental Protection
5.23	Policy ENV 1 states planning permission will be granted for development that will maintain and, where possible, enhance environmental quality, and protects communities from materially harmful development.
5.24	In terms of contaminated land a Preliminary Risk Assessment has been submitted. Environmental Health were consulted and had no objections with conditions. The proposal is therefore considered to comply with Policy ENV 1.
	Neighbour Notification Checked Yes
	Summary of Recommendation

	Having regard to the development plan and other material considerations, the proposal is considered acceptable. It is recommended that planning permission is approved. Delegated authority is sought for the Director of Planning and Building Control to finalise the conditions and deal with any other matters which may arise.
	DRAFT CONDITIONS 1. The development hereby permitted shall be begun before the expiration of 5 years from the date of this permission. Reason: As required by Section 61 of the Planning Act (Northern Ireland) 2011. 2. All hard and soft landscaping works shall be carried out in accordance with the approved details. The works shall be carried out prior to the of any part of the development unless otherwise agreed in writing by the Council. Any existing or proposed trees or plants indicated on the approved plans which, within a period of five years from the date of planting, die, are removed or become seriously damaged, diseased or dying shall be replaced during the next planting season with other trees or plants of a location, species and size, details of which shall have first been submitted to and approved in writing by the Council. All hard surface treatment of open parts of the site shall be permeable or drained to a permeable area. All hard landscape works shall be permanently retained in accordance with the approved details. Reason: In the interests of the character and appearance of the area. DRAFT INFORMATIVES 1. Please make sure that you carry out the development in accordance with the approved plans and any planning conditions listed above. Failure to do so will mean that the proposal is unauthorised and liable for investigation by the Council's Planning Enforcement team. If you would like advice about how to comply with the planning permission, you are advised to contact the Planning Service at Belfast City Council at planning@belfastcity.gov.uk. 2. This planning permission includes condition(s) which require further details to be submitted to and approved by the Council. Please read the condition(s) carefully so that you know when this information needs to be provided and approved. It could take a minimum of 8 weeks for the Council to approve the details, assuming that they are satisfactory, and sometimes longer depending on the complexity of the condition. You should allow for this when planning the timeline of your project. 3. The grant of planning permission does not dispense with the need to obtain licenses, authorisations may have been identified by consultees in their response to the application and can be accessed on the Northern Ireland Planning Portal website. The responses from consultees may also include other

	general advice for the benefit of the applicant or developer. consents or permissions under other legislation or protocols.
--	---

This page is intentionally left blank

By virtue of paragraph(s) 1, 3, 5 of Part 1 of Schedule 6 of the Local Government Act (Northern Ireland) 2014.

Document is Restricted

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 1, 3, 5 of Part 1 of Schedule 6 of the Local Government Act (Northern Ireland) 2014.

Document is Restricted

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank