

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.