

Dilapidated / dangerous buildings and neglected sites

Comments by
Northern Ireland Environment Link

30th June 2016

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 70+ Full Members represent over 90,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

These comments are made on behalf of Members, but some members may be providing independent comments as well. If you would like to discuss these comments further we would be delighted to do so.

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Northern Ireland Environment Link welcomes the opportunity to engage with the Department on its consultation on Dilapidated / dangerous buildings and neglected sites.

The issue of dilapidation and neglected sites and buildings is important to tackle in Northern Ireland. As the consultation points out, it is particularly seen in our town centres across NI, and sends out the wrong message in terms of building places in which we want to live, work, visit, and that can attract inward investment.

Therefore, NIEL agrees that **Option 4 should be the preferred option**, in introducing **enabling legislation that will give councils the tools to deal with the problem, and a duty to act.**

Key issues:

- **Place-making/shaping and community cohesion**

NIEL would like to see greater emphasis on Living Places¹ as an Urban Design Guide – councils should be cognizant of the importance of Placemaking and its role in building communities, and the principles of this guide should be embedding in planning in local authorities.

The role that the environment and heritage can play in the development of shared spaces and services, and in facilitation of community cohesion, should not be underestimated. Enhancing the environment, in terms of public space, has been shown to have a positive impact on, for example, social cohesion and inclusion, with an associated reduction in crime and anti-social behaviour. When designed and maintained well, shared public spaces can bring communities together, provide meeting places, and foster the kind of social community building that can so easily get lost in our urban areas. Well-designed and maintained spaces and places shape the culture of an area and help to inform the identity of local communities.

- **Heritage and innovation**

Urban dwellers want to live and work in rich historic surroundings. As such, proper protection and conservation are needed in our urban areas. Interpretation of our historic fabric needs to be more widespread, leading to a deeper understanding among the public. Such understanding leads to valuing, and valuing leads to conservation (which in this context should be a holistic act over an urban area rather than isolated intervention).

¹ http://www.planningni.gov.uk/livingplaces_-_web.pdf

That said, the protection of historic fabric is not something that need restrain economic activity. Rather, as the HLF report 'Investing in Success'² demonstrates, the contribution of heritage to the economy is (and should be) significant. Economic growth is strongest in cities with a rich historic environment. Without old buildings and historic fabric, cities lose their distinctiveness and hence their competitive advantage. Thus, we do ourselves no favours by ignoring the potential economic and social value inherent in our surviving heritage. What we require is the creativity and investment to unlock the existing potential – this creativity and investment will flow from understanding leading to valuing, and valuing leading to conserving urban heritage.

'Everyday' heritage is important to urban spaces and places – what people encounter in their daily lives really matters to them. Thus, NIEL recommends the creative use of old buildings in everyday surroundings – for example, for accommodation, office space, shopping. People enjoy being in and having beautiful and historic structures around them (for more information on this, see HLF report, 'New ideas need old buildings'³). The single most catastrophic event in the life of a building is abandonment. When an historic structure falls out of use, it very quickly falls into disrepair and suffers consequent de-valuing in the eyes of the public. To work against this kind of downward cycle, NIEL recommends meanwhile/interim uses of vacant historic buildings – getting organisations/people into listed and protected buildings to ensure that they are used and cared for and are not perceived as a nuisance or eyesore. We would encourage 'pop-up' and innovative uses as test beds for economic activity. The HLF Townscape Heritage Programme supports the holistic heritage-led regeneration of our towns & Conservation Areas, and has seen significant successes⁴.

We agree that any new legislation should not result in a reduction in the level of protection afforded to heritage buildings, but should rather enhance protection through enabling innovative ways of dealing with neglect and dilapidation to bring buildings into use again. There must be incentives in place to make it easier to use an old building than to demolish it.

We suggest that any legislation should address the issue of getting buildings into the right ownership (especially historic buildings / Buildings at Risk), in terms of

² <https://www.hlf.org.uk/investing-success-heritage-and-uk-tourism-economy>

³ <https://www.hlf.org.uk/new-ideas-need-old-buildings>

⁴ <https://www.hlf.org.uk/about-us/news-features/%C2%A321m-21-years-northern-ireland%E2%80%99s-townscape-heritage>, <https://www.hlf.org.uk/townscape-heritage-initiative-evaluation>

acquisition powers. In this context, community-led regeneration / community asset transfer should be explored and promoted.

- The issue of **brownfield sites of high environmental value** has been outlined by the Wildlife and Countryside Link (NIEL's sister Link organisation)⁵.

This statement says that "Redeveloping brownfield land can provide sustainable development opportunities, reduce pressure on undeveloped land, and offer chances to promote economic regeneration. However, a minority of previously developed sites are havens for wildlife. Two of the UK's top sites for wildlife diversity, are brownfield land and support some of the UK's most scarce and threatened species. In many cases they provide the last 'wild space' in urban areas for local communities, all owing them access to nature and consequently improving the communities' well-being.

In many built-up areas, brownfield sites may be the sole semi-natural green-space available and the only option for the local community to connect with nature. Many brownfield sites are used informally for recreational activities such as walking, cycling and horse riding. These sites are also used as thoroughfares between other urban areas as part of a green infrastructure network. In such cases, it may be worth noting whether the sites are identified as part of a local green infrastructure strategy. Providing a site is not seriously contaminated, there is great potential to make many of these sites more accessible, safe and enjoyable through imaginative planning and positive management. In turn, this will bring attendant quality of life and health benefits to residents, as well as wider economic advantages."

Of course, whenever any kind of works are to be carried out on a dilapidated building or neglected site, they should be subject to appropriate wildlife surveys (CEDaR records can be used to determine potential species present).

Recommendations for making it work 'on the ground':

- Any new legislation should provide the means for statutory undertakers to recover their full costs when tackling the issues of dilapidated or neglected buildings.
- All statutory undertakers must be willing and able to use the powers vested in them and have a broadly similar understanding of how and when to apply them.

⁵<https://www.buglife.org.uk/sites/default/files/When%20is%20Brownfield%20land%20of%20high%20environmental%20value%20June%202015.pdf>

- There may be particular issues to explore around the necessary council powers to sell property in order to recover costs and the sale

NIEL will be happy to engage with the Department further on any aspect of this consultation response.