

Conservation Principles: Guidance for the sustainable management of the historic environment in Northern Ireland

Comments by

Northern Ireland Environment Link

8th October 2021

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the natural and built environment of Northern Ireland. Its 66 Full Members represent 190,000 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 happy to do so.

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Introduction

Northern Ireland Environment Link (NIEL) welcomes the opportunity to respond to this consultation. NIEL would like to endorse the detailed responses submitted by Ulster Architectural Heritage (UAH) and The Architectural Heritage Fund (AHF).

NIEL is the networking and forum body for non-statutory organisations concerned with the natural and built environment of Northern Ireland.

NIEL engages regularly with and provides input to the Historic Environment Division of the Department for Communities. NIEL is represented on the Historic Environment Stakeholder Forum Core Group; the Culture, Arts and Heritage Taskforce; provides support to the Heritage Delivers website and previously maintained a secretariat role for the former NI Archaeology Forum and the Way Forward for Archaeology Group.

The historic environment is all around us, and it tells our story. It tells us who we have been, and therefore is a central element in who we are and who we can be. It binds us all in this small space and shapes our identity. Northern Ireland has a wide and varied heritage which ranges from archaeological remains to small cottages to large castles to extended landscapes. They are all a product of a rich and complex history that has made our towns, cities and rural areas unique and special. The features they contain are not just relics of the past, but assets that can deliver important benefits to our economy, society and the environment. But this resource is finite. We need to understand what we have, the opportunities it presents, and the need to protect it.

General Comments

We note that this document, Part 1, sets out the six key guiding Conservation Principles, and Part 2 will set out how to apply these principles. NIEL broadly welcomes and agrees with these 6 principles, but emphasise that the application (i.e. Part 2) is absolutely critical. NIEL echoes the concern raised by UAH in their consultation response that “*guidance and principles cannot replace policy*”. As mentioned within the introduction, DfC encourages landowners, developers, policy makers and decision makers (central and local government) to refer to the Conservation Principles – but this feels insufficient given the ongoing losses to the historic environment.

As discussed at length within the UAH response, NIEL would also acknowledge the unintended impact of the Review of Public Administration (RPA) upon the historic environment. By 2015, considerable expertise in development and land use planning, and across the various specialist disciplines of heritage management, was centralised within the former Department for the Environment. While the situation was certainly not perfect, the result of RPA has been to fragment the sector with responsibilities being shared between a number of Departments and the 11 local authorities.

NIEL very strongly believes that the Historic Environment Division should be appropriately staffed and resourced to act as a strategic lead for heritage. As development planning now sits with the 11 local authorities, it is important that HED can engage meaningfully with councils, providing advice and support to ensure that our finite assets are not lost through ill-informed planning decisions. It is also vital that HED engage with landowners and developers to ensure that planning applications are of a high standard and give appropriate regard to heritage assets.

NIEL would like to see more funding made available to help support the historic environment sector which has historically been underfunded. The voluntary sector is well placed to help government meet its statutory targets, deliver crucial conservation work on the ground, provides value for money and can attract large numbers of volunteers to support their work.

A good example of the impact of this lack of resourcing is the Way Forward for Archaeology and the resulting 10 Year Archaeology Strategy. This was an in-depth process with very wide and constructive consultation, which resulted in a Strategic document which was very well received, but a lack of resourcing has resulted in limited implementation.

NIEL would also echo the points raised by AHF, in that the document has lots of strong content, but it is unlikely that it will impact upon the audiences that it needs to reach in this format. NIEL agrees with the AHF that the document would benefit from the use of illustrative examples – to celebrate heritage and also offer examples of best practice.

We also note that the back page of this document could include more contact information to help filter through queries to the relevant team within HED – as appears on the [DfC website](#).

Overall, NIEL broadly agrees with the six principles outlined within the conservation document. Our specific comments appear below:

1. The historic environment is of value to us all

1.4 – We feel that the wording of this section following on from “...*regardless of ownership*.” is slightly confusing. International legislation should be legally binding. We suggest replacing ‘The use of’ with “*Compliance with...*” or “*Appropriate regard to...*”.

1.5 – “*Advice and assistance should be available*” should read as “*Advice and assistance is available from the Historic Environment Division of the Department for Communities.*” The current wording may be interpreted in such a way as to indicate that this is currently under development/not currently available.

2. Everyone should be able to participate in sustaining the historic environment

No further comment.

3. Understanding the significance of heritage assets is vital

3.1 – We agree with UAH that this section should include “Industrial Heritage” and emphasise the significance of cumulative loss.

4. Heritage assets shall be managed to sustain their significance

4.1 – This section should include a reference to “*deliberate or accidental damage*”.

4.4 – We support the AHF suggestion of including a reference to “*minimum intervention and maximum retention*” as the default position when considering work on a heritage asset.

5. Decisions about change shall be reasonable, transparent and consistent

NIEL welcomes the substance of this principle, but would like to see more specific reference here to a commitment to the principles of openness, transparency and accountability. As

mentioned earlier in the document, heritage assets are “*of public interest regardless of ownership*” and so any decisions made regarding these assets should be documented and posted online or made available upon request.

We would also note the importance of timely, and well planned community engagement. DfI are currently reporting on the findings of their Planning Engagement Partnership, which is reviewing community engagement and making a range of recommendations. HED should have some consideration of that report when complete.

6. Documenting and learning from decisions is essential

NIEL believes that this principle is of great importance. Where mistakes have been made in the past, these should be learnt from and avoided in the future. Correcting the damage inflicted by inappropriate development is difficult, expensive and often impossible to reverse.