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22 October 2026

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**IHBC Consultation response on the Historic Environment Policy for Northern Ireland**

The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all. The IHBC Northern Ireland branch welcomes the development of the first dedicated Historic Environment Policy for Northern Ireland and particularly supports the ambition to reposition the historic environment as an enabler of sustainable development, regeneration and community wellbeing.

We consider that the final policy should place greater emphasis on conservation-led adaptive reuse. The most sustainable future for many heritage assets will depend upon their ability to remain in, or return to, viable use. Sensitive adaptation, repair and compatible retrofit should therefore be recognised as positive conservation actions where they are informed by a proper understanding of significance and follow established conservation principles. Adaptive reuse also provides an important connection between heritage policy and wider objectives for climate action, town and village regeneration, housing, community infrastructure and social value. Retaining and adapting existing buildings conserves embodied

carbon, reduces waste and allows historic places to continue contributing meaningfully to contemporary life.

The consultation document sets out a strategic and ambitious vision, but it would benefit from clearer details on delivery, monitoring, and resourcing. It would be helpful to understand the formal status of this document and its relationship to current and future departmental strategic policies and guidance, as well as local-level policymaking in Local Development Plans. The draft policy's exact purpose remains unclear. It is difficult to determine whether it is intended to function as a strategic vision, a material planning consideration, or a framework for future guidance. To help stakeholders understand its practical impact and measure its success, the policy must clearly define its relationship with the current planning system and outline the distinct roles of central and local government. As this is a ten-year policy, clearer details on funding, delivery, governance, and responsibilities are needed to judge whether its goals are realistically achievable.

The commitment to align heritage protection with recognised principles and international conventions is welcome, but the document does not specify how these standards will be applied within the planning policy framework.

The ambition to develop a highly skilled workforce is welcome, but the policy does not explain how this objective will be delivered in practice. To ensure consistent and informed decision-making across the sector, further clarity is required on whether HED intends to introduce structured training programmes, professional development pathways, or capacity-building sessions reflecting the broad range of inter-disciplinary historic environment specialism and capable of meeting the cross-cutting potential of the sector. This is particularly important for Council planning officers, who routinely assess proposals involving adaptive reuse, vernacular heritage assets, and locally significant historic fabric. Presently, the professional framework within Northern Ireland remains overly narrow, dominated by traditional disciplines. There is an opportunity to match the progressive delivery models of other national heritage bodies and to actively accommodate and champion dedicated professionals in specialist heritage evaluation, climate adaptation, and community practice. Without a defined delivery mechanism or commitment to resourcing such initiatives, it is unclear how this policy aim will translate into measurable improvements in conservation practice or support the sustainable development of the historic environment. Partnership must be accompanied by investment in skills, capacity and implementation. A strong policy framework will only achieve its objectives where those responsible for managing change have access

to appropriate conservation knowledge and expertise. Building conservation capacity across local government, the professions, the construction sector and communities should form an important part of the policy implementation.

The commitment to embed transboundary and international cooperation is positive, but the policy provides no detail on who this cooperation will involve or how it will be facilitated. If this is intended to operate through the planning system such as during applications requiring planning permission or listed building consent, clarity is needed on the statutory basis for such engagement and the practical steps required to implement it. Councils located close to the border may need to consult additional bodies or authorities, yet there is currently no facility within MasterGov to enable such consultation. Without a clear operational framework, the practical implementation of this policy aim remains uncertain, and its effectiveness cannot be meaningfully assessed.

Given that several Councils have now adopted their Plan Strategy, the policy must clearly articulate how it is intended to interact with existing Local Development Plans. If the document is to function as Supplementary Planning Guidance (SPG), this should be explicitly confirmed, including whether it will necessitate immediate LDP review or the preparation of additional evidence bases. Alternatively, if the policy is intended to influence planning decision-making primarily through HED consultation responses, this should be clearly stated to ensure consistency across planning authorities. Without clarity on its formal status and operational role, it is difficult to determine how the policy will be applied in practice or how it will align with established plan-making processes.

The consultation document does not include details of how financial resources will be allocated or what funding will be made available. Without this information, it is impossible to evaluate whether the policy objectives are realistically achievable.

The term “heritage plan” is used without any definition of what this is or what its status may be.

Historic buildings and places actively underpin and strengthen our social, economic, and cultural infrastructure. The social and economic opportunities of heritage should be more actively highlighted throughout the document. By reusing and caring for the historic environment, communities can drive sustainable economic growth, foster a sense of cultural identity, and support social well-being.

IHBC NI also strongly supports the emphasis on partnerships. Successful delivery will require collaboration extending beyond government and statutory bodies to include District Councils, communities, owners, conservation professionals, universities, funders, craftspeople and heritage organisations. There is a particular opportunity for the IHBC NI to contribute through professional expertise, training, CPD, research, technical guidance, case studies and knowledge exchange (international, ROI/EU and UK). We would therefore encourage the policy to recognise professional heritage organisations as active delivery partners rather than solely consultees.

Whilst we appreciate that the format of the consultation assists departmental analysis by providing a structured framework within which questions are posed, we suggest that the format is not user-friendly. The questions are not presented in a neutral way, particularly where the options provide only a yes/no response and do not allow for more nuanced consequences that may arise from policy implementation. This format makes it challenging for an institute such as ours, with specialisation in the historic built environment, to fully articulate our concerns.

Yours sincerely

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