

Clerk Nick Henry  
Committee for Agriculture, Environment  
and Rural Affairs  
Room 242, Parliament Buildings  
Stormont,  
Belfast  
BT4 3XX

14 July 2021

## **Re: Climate Change Bill Consultation**

Dear Committee Chair,

I am writing on behalf of the Historic Environment Stakeholder Group to highlight to the Committee the role heritage plays in tackling climate change.

The Historic Environment Stakeholder Group is made up of a wide range of organisations working across the historic environment sector in Northern Ireland. We bring a collective wealth of knowledge and experience as large-scale national bodies, charities, funders, micro businesses and freelance contractors. Some of the organisations are listed at the end of the letter.

### **Historic Environment and climate change**

Northern Ireland has a rich and diverse natural and historic environment that contributes to identity, sense of place and history. Health and wellbeing are directly affected by the quality of the environment around us. The Historic environment can also play a role in tackling climate change.

We welcome the addition of the Sustainable Development goals within the Executive's Programme for Government (PfG). Sustaining our historic environment is a financial and logistical challenge but investing in heritage today is a down payment on greater riches in the future – a vital ingredient in sustainable development.

Sustainability has four dimensions - social, economic, environmental and cultural. Re-use and the promotion of the historic environment addresses all four dimensions. We cannot meet our 2050 carbon emission targets if we do not tackle carbon emissions in our existing building stock. We can dramatically reduce carbon in historic buildings through retrofit<sup>1</sup>.

In the Executive's December 2020 publication 'What Matters Most? - A qualitative analysis'<sup>[1]</sup>, the environment was a priority for both young people and younger adults who raised concerns about climate change and society's impact on the environment. They were extremely worried that the government was ignoring the problem and not adequately legislating to safeguard the environment for generations to come.

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<sup>1</sup> [Re-use and Recycle to Reduce Carbon \(historicengland.org.uk\)](https://www.historicengland.org.uk)

<sup>[1]</sup> [What Matters Most? \(executiveoffice-ni.gov.uk\)](https://www.executiveoffice-ni.gov.uk) (NISRA, Dec 2020)

## **Repurposing buildings - cornerstone of sustainable development**

Repurposing old buildings is the cornerstone of sustainable development because it creates more jobs and uses fewer resources than fresh construction. Fresh construction also incurs additional costs in energy and landfill.

The Heritage at Risk register of NI (HARNI) was established in 1993 to raise awareness of buildings that are listed or in Conservation Areas but vacant or in disrepair. It was expanded in 2004 to include scheduled monuments. Since then, we have seen over 305 heritage assets on the register brought back into use and taken off the register, but the number of assets on the register has steadily increased from 399 to 620. The Department for Communities works in partnership with Ulster Architectural Heritage to encourage developers, communities and individuals to find solutions for the issues faced by these assets and to secure a sustainable future for them.

Protection of heritage means use of heritage, which requires investment and incentivisation to prioritise heritage reuse. This 'adaptive reuse' is one of the best ways to engage the private sector in heritage preservation. Companies recognise the benefits of regenerating local areas and consumers seek brands that stress their authentic roots.

We aspire to see the reuse of heritage assets being prioritised in repurposing our city and town centres with a suite of fiscal incentives which will, over time, help drive work to value heritage.

For heritage to survive it needs to be actively used. Our built and intangible heritage can guide the types of developments that will enhance the historic environment, whether the developer is in the private sector or a community organisation.

The public enjoy and appreciate the use of good quality design in the repurposing of buildings within the Historic Environment.

One excellent example of this is the award-winning Merchant Hotel. Ulster Bank's old headquarters aspired to the heights of Victorian grandeur. Another example of sustainable development is the restoration and re-purposing of the former Harland and Wolff Headquarter Building and Drawing Offices (a B+ listed building) into the award-winning Titanic Hotel Belfast. A Grade B listed building which was on the 'At Risk' Register was saved, and the building was sensitively transformed into a successful boutique hotel, with the Drawing Offices and heritage features at the very heart of the project. The hotel is now an established component of Belfast's tourism and hospitality offer attracting local and international business<sup>2</sup>.

Several library properties, including Falls Road, Ormeau and Holywood libraries and the Belfast Central Library are examples of historic buildings which continue to operate as functional buildings, and which have adapted their use in a sustainable way over time in line with service delivery and customer demands.

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<sup>2</sup> The £22million project could not have happened without support from The NLHF Heritage Enterprise Fund and the Government's Building Renovation Preservation Allowance

The historic environment sector has come together in this way because we recognise that there are some significant issues. For example, we know that preserving the historic environment is seen by some as an impediment to economic wellbeing. There are increasing numbers of properties on the heritage at risk register; people continue to wilfully destroy heritage assets; and some owners are too afraid to retain and reuse them. Often, short term, private economic gain is seen as more important than longer-term, public benefit.

Many stakeholder group members are working very hard towards sustainable development. The UK VAT system disincentivises refurbishment and repair and maintenance while incentivising new development. Current VAT rules on construction are out of date and stand in the way of reducing UK carbon emissions. Changing VAT rules to encourage the re-use of buildings is the best way to start making that change to meet our 2050 targets. This is impacting heritage in Northern Ireland.

As outlined in the Regional Development Strategy 2035<sup>3</sup>, we should “...conserve, protect and, where possible, enhance our built heritage and our natural environment”. The strategy also clearly articulates Northern Ireland’s environment as comprised of natural and built heritage.

Northern Ireland’s historic environment and natural environment are intertwined, each shaping the characteristics of the other. The natural environment we enjoy has been characterised over millennia of human interaction with the landscape, defining spaces, boundaries, and places across the landscape.

The inclusion of the historic environment/ built heritage as an environmental concern would show cognisance of existing objectives in Regional Strategic Policy and Guidance.

Our region has a rich and diverse archaeological and built heritage as well as a distinctive and beautiful landscape. It also plays a critical role in supporting the local economy and must continue to do so through sustainable economic development activity.

The historic environment and the natural environment have considerable synergies and their integrated management is essential if the Sustainable Development Goals (SDGs) are to be delivered in Northern Ireland, particularly in relation to achieving more sustainable consumption (SDG 12), protecting and restoring ecosystems (SDG 15) and combating climate change (SDG 13).

Together with the construction sector, the built environment is the third biggest carbon emitting sector in the UK, making up 40% of the country’s total carbon footprint. The historic environment is part of the solution to reducing these carbon emissions by reusing historic buildings (and responsibly refurbishing them), rather than demolishing and building new.

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<sup>3</sup> [Regional Development Strategy 2035 \(infrastructure-ni.gov.uk\)](https://www.infrastructure-ni.gov.uk)

Just this week we have heard of more bank closures across Northern Ireland, a trend over the last number of year. Many of these banks are located in heritage buildings but how can those buildings of heritage value be repurposed and recreated as community hubs in towns across NI.

It is vital that the historic environment sector is involved with key forums such as the High St Taskforce which has been tasked with regenerating town and city high streets in NI, given the importance of reusing heritage assets.

### **Shared Challenge**

We welcome the news that the Department for Communities and the Department of Housing, Local Government and Heritage, in the Republic of Ireland signed a Memorandum of Understanding (MOU) on Cultural Heritage and Climate Action on 9<sup>th</sup> July to support greater North-South co-operation in dealing with the impacts of climate change on built and archaeological heritage across the island.

Many of our heritage characteristic within the landscape and seascape don't recognise borders such as heritage trails, waterways and loughs. So, there is a shared challenge of protecting our heritage from the impact of climate change and extreme weather conditions across the island of Ireland.

The MOU is a positive step in recognising the central role heritage can play in driving climate action and in supporting communities to make a transition towards climate resilience. It is also opportunity to share knowledge and experience. Collective responsibility is essential in tackling climate change to ensure that our children and future generations can draw benefit and enjoyment from our environment.

### **Key points:**

1. The historic environment plays an important role in protecting the environment and reducing whole life carbon emissions from buildings which is helping to combat climate change. The sector should be involved in the development of Climate Action Plans at local and central government level.
2. To reduce the construction industry's production of greenhouse gases and help revitalise local economies, the Executive should prioritise the reuse of heritage assets to repurpose our city and town centres through the development of a suite of fiscal incentives that support this prioritisation within development and planning.

This could include pushing for the introduction of a zero rate of VAT on repairs and maintenance to designated heritage assets and reviewing relevant elements of policy including land use planning policies to ensure that they support the maintenance and reuse of our historic environment.

If you would like any further information on what we have written or would like to hear from representatives of the Historic Environment Stakeholder Group, please do get in touch.

Yours Sincerely,

Dr Paul Mullan

Director, The National Lottery Heritage Fund in Northern Ireland

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## **Appendix 1 – List of member organisations**

1. Architectural Heritage Fund
2. Armagh, Banbridge & Craigavon Council
3. Belfast Buildings Trust
4. Derry City & Strabane District Council
5. Federation for Ulster Local Studies
6. Hearth Historic Buildings Trust
7. Heritage Hub, Queen's University Belfast
8. Historic Houses
9. Inner City Trust
10. Libraries NI
11. Linen Hall Library
12. Inner City Trust
13. Maritime Belfast Trust
14. Mid and East Antrim Borough Council
15. Ministerial Advisory Group for Architecture and the Built Environment (MAG)
16. National Lottery Heritage Fund
17. National Trust
18. Northern Ireland Environment Link (NIEL)
19. Royal Society of Ulster Architects
20. Royal Town Planning Institute
21. Tourism Alliance
22. Ulster Architectural Heritage