

Historic Environment Division

6th Floor, Causeway Exchange
1-7 Bedford Street
Town Parks
Belfast BT2 7EG

Phone: (028) 9082 3123

email: ian.greenway@communities-ni.gov.uk

Date: 25 January 2018

Dr David Johnston
Chairman
Ulster Architectural Heritage
The Old Museum Building
7 College Square North
Belfast
BT1 6AR

Dear David

HISTORIC ENVIRONMENT FUND REGENERATION STREAM: HERITAGE AT RISK RECORDING PROJECT

Many thanks indeed for the society's email of 16 October covering the final version of the BHARNI review. Nikki and I have spoken about the report since then, and the issue of heritage at risk was one of the topics of discussion at the Stakeholder Group meeting on 1 December. I have therefore delayed replying to the letter until after that discussion.

For the record, I should state that HED is content that the report is complete, and is very grateful for the work that has gone into compiling it.

The challenge now, of course, is to decide on next steps – drawing on the conclusions of the report regarding work over the last 20 years, and various other discussions and considerations (including the 1 December discussions).

HED's view at this stage is that a register should be maintained, that it should be retitled Heritage at Risk NI and should include additional scheduled monuments as well as listed buildings. The matter of including conservations areas is one we feel requires further consideration, but we appreciate that this would bring us into line with other parts of the UK and perhaps elicit further engagement from district councils. If conservation areas were also to be included, we would also need to consider the various other heritage landscape designations such as Historic Parks and Gardens, and Areas of Townscape/ Village Character.

The report correctly points out the need for close liaison with district councils, and this also came out in the discussion on 1 December, with one council officer highlighting their dilapidations register and the potential benefits in bringing this work together with BHARNI.

Another key theme on 1 December was to include the potential uses of a building (and their potential impact on the community, economy and tourism) – and the timeframe within which they could realistically be realised – into the register's records. This was also a theme of the Colliers report on heritage at risk a number of years ago; we are minded to progress this.

A key challenge, of course, will be funding and how to prioritise work on BHARNI alongside other activities regarding the historic environment – the report suggests that a full approach to its recommendations may require five staff. As a comparison, this is not far off the architectural staff we are able to devote to the Second Survey at present; and is around the level of resource we can devote to planning consultations from three district councils. This sort of level is therefore probably unrealistic from Executive funding – we will have to consider what the priorities are around heritage at risk and how we can focus available resources on these priorities.

Some of the report's proposals will be picked up in other work underway, including owners forums which we intend to reinstate in 2018; and the work HED has underway around digital transformation including new IT systems and databases. Other elements dovetail with work being progressed by the Stakeholder Group, for instance the audit which NIEL has commenced and which will collect a range of data; and the report cards for PfG delivery actions which will gather statistics of activity and outcomes.

Turning to the report's specific recommendations, we would take the following view at this stage:

1. Systematic, cyclic survey – we agree with the benefits, but this will need to be prioritised alongside other calls on funding. On occasion it will be picked up in other work around planning applications. In passing I should note that the recommendation of the NIAO in 2011 regarding the prioritising of buildings at most risk in the Second Survey has been implemented, as the areas taken forward for Second Survey now include as phase one currently unlisted buildings – i.e. those buildings meeting the criteria for listing which have not yet been listed. This is the focus of the NIAO recommendation. HED also hopes to rerun the condition survey once funding allows, recognising that this is an important source of information. HED will consider this recommendation further when budgets for future years are known. We, however, welcome the data

capture in the past year for the existing entries which is bringing the database up to a good standard.

2. Addition of scheduled monuments and conservation areas – as noted above, we will progress the addition of scheduled monuments as the next stage and seriously consider the introduction of area based designations.
3. Portal and toolkit – this can fit naturally as part of the HED digital transformation work; we would intend to include indicators around potential for reuse, and link to various relevant guidance (as well as use the Owners Forums as key awareness-raising events)
4. Focus on types, areas, owners and campaigns – this provides a useful framework against which progress and activity can be reviewed and will be taken forward as a taxonomy. The possibility of focusing in areas, akin to the Heritage Action Zones in England, is something that we have discussed and indeed are already progressing through connections across DfC, for instance in work in Carrickfergus
5. Inclusion of local authorities – we agree that this is appropriate and important, and HED's discussions with district councils include heritage at risk and enforcement issues. The potential connection with dilapidations registers may assist further, as would highlighting these issues in community plan work
6. Priority and additional funding – the 1 December discussion did not come to a clear conclusion on whether heritage at risk should be prioritised for funding. We will need to consider this further, within the constrained funding available – the Stakeholder work around a compelling narrative etc will assist in highlighting the importance of heritage and the benefits that it can deliver, but a return to previous levels of grant funding is unlikely in the current fiscal climate
7. Change of name – agreed
8. Integration into a larger Heritage Index – as indicated above, the collation of a stock of data to support the compelling narrative etc is important, and the PfG statistics and heritage audit will support the creation of this; I would expect heritage at risk to be a component of the statistics. HED isn't convinced that there are specific efficiencies to be gained by sitting the heritage index work alongside the heritage at risk work
9. Funding – as indicated above, the funding environment continues to be challenging. HED continues to attempt to be creative in prioritising and using available funding; the use of other funding sources was an important topic of discussion on 1 December, with agreement that Northern Ireland lags behind GB in terms of recognising and accessing a wide range of funding.

Overall, therefore, you will note that we agree with the majority of the recommendations, and believe that even within the current funding contains some can be progressed in the short term. Given that whatever option is taken forward will require funding, we will now progress the required economic appraisal process. Part 1 of this will consider the extent of activity, from none (a required option in such appraisals); roughly current levels (with the agreed changes above); a register fully audited with cyclical surveys; and a register which is embedded in other activities such as responses to planning applications, Owners Forums, guidance, working with councils etc. The process will also consider the approaches taken in other jurisdictions.

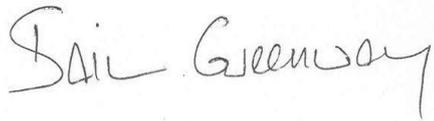
Stage 2 of the appraisal process then considers method of delivering the preferred option. This will include consideration of procuring through contract; doing the work in-house in HED; or a mixed model. These all need to be considered as part of the appraisal process; and I have previously indicated to Nikki and to Primrose that government procurement guidance will require procurement of the work as it is a service provided to government. The use of letters of offer therefore cannot continue in the medium term.

HED will progress this work, recognising that the existing letter of offer to UAHS (now UAH) expires on 31 March 2018. Our intention would be to move to the new approach from 1 April 2018 if at all possible. We recognise the time challenges in this, and will take the next steps over the next few weeks. As we may proceed to a tendering exercise after the work, we will not be able to involve UAH in our considerations, as doing so could preclude your being able to tender. We will, however, have the report and our engagements to date to draw on.

Thank you again for the work that has gone into the completion of the report – and indeed the 20 years of hard work and partnership that it represents. We think that this is a good overall document worthy of wider public awareness as it represents the conclusion of such a significant period of work. To that end I propose that this is digitally published, under UAH branding, and made available to the wider community. As a report to the Department it is appropriate that it is published on the Departmental website, but there will also be benefit in publishing it on the dedicated BHARNI section of your own website as well. You may also want to rebrand the cover to reflect your new corporate identity and I am happy that you do this. I would propose that this letter is published alongside the report in both places, as the Department's response.

Please, therefore, liaise with Caroline Maguire in regard to the timing and approach of the release of the report and this letter. I would propose a low-key approach to publicity around releasing the report, pending the Department's completion of an economic appraisal.

Yours sincerely

A handwritten signature in black ink that reads "Iain Greenway". The signature is written in a cursive style with a large initial 'I' and a long, sweeping underline.

IAIN GREENWAY
Director Historic Environment Division

cc Nikki McVeigh
Manus Deery
Caroline Maguire