



Response to the consultation on a Historic Environment Policy for Northern Ireland

Department for Communities · Culture Policy Branch · Submitted 23 October 2026 · Robert J. Park, Larne, County Antrim

Dear Sir or Madam,

Please accept this as my response to the consultation on a Historic Environment Policy for Northern Ireland. I respond as an individual and agree to publication.

About me

I am Robert J. Park, an independent environmental, carbon and public affairs consultant based in Larne. My work covers land, contamination and carbon for Northern Ireland businesses and public bodies. I am also preparing a Public Realm (Framework and Entitlement) Bill, a proposed statutory framework for the streets, parks and public spaces where most people meet the historic environment, and I track public consultations across Northern Ireland's councils and departments.

Summary

I support a single, ten-year Historic Environment Policy, the draft vision and most of the 17 aims. The policy is strong on value and weak on means. Buildings on the heritage at risk database have more than doubled, from 527 in 2018/19 to 1,148 in 2024/25, and 96% of sector investment in 2023/24 came from the National Lottery Heritage Fund. Aims alone will not reverse that. I ask DfC to strengthen the policy in eight ways:

1. **Treat heritage as land to be looked after**, not only buildings to be designated, with a clear link to land remediation and Northern Ireland's uncommenced contaminated land regime (section 1).
2. **Name the historic public realm** — streets, squares, conservation-area streetscapes, historic parks and the foreshore — and share responsibility for it with the Department for Infrastructure and councils (section 2).
3. **Make access part of heritage**. Most of Northern Ireland's historic environment is reached on foot across land with no recorded right of way. Pair the policy with a programme to record, assert and extend public access (section 3).
4. **Plan for the working heritage**: the mills, yards, quarries, forests, farms, harbours, pitches and stages where Northern Ireland made its living and spent its leisure. They carry the economic case the policy needs, and most are undesigned (section 4 and Annex A).
5. **Give the heritage at risk trend a target and tools**: repair and enforcement powers used, a revolving fund, community ownership, and a share of the land value that heritage-led regeneration creates (section 5).
6. **Count carbon in every decision** to repair, re-use or demolish (section 6).
7. **Live up to Conservation Principles 5 and 6** by publishing decisions, data and progress (section

7).

8. **Treat the coast, the Crown Estate's seabed and foreshore, Lough Neagh, the eight AONBs and the ASSIs as historic environment in their own right**, with the Crown Estate, the Lough Neagh owners and the AONB bodies as named partners (Annex B).

1. Land husbandry and land remediation (aims 1, 3, 6 and 9)

Much of Northern Ireland's historic environment is not a listed building in a town centre. It is land: industrial sites, quarries and kilns, mills and their water systems, military and telecommunications sites, field systems and buried archaeology. Its condition depends on land husbandry, the patient, continuous care of ground, drainage, vegetation and structures over decades. Heritage at risk is, very often, land that nobody is caring for.

Many of these sites carry a legacy of contamination from their former use: fuels and oils, asbestos, lead, treated timbers, bleaching and dyeing chemicals, and industrial residues. That matters for heritage in three ways:

- **It stops re-use.** Owners, community groups and funders will not take on a site with unknown ground conditions. Uncertainty about contamination is one of the quiet reasons historic sites stay derelict.
- **Clean-up can destroy what it means to save.** Remediation that strips or caps ground without archaeological advice can remove buried remains, and archaeological fieldwork on contaminated land needs to be planned for safety.
- **There is no regime to resolve it.** Part III of the Waste and Contaminated Land (Northern Ireland) Order 1997, which would give councils a duty to inspect their areas and a basis for deciding who pays to clean up, has never been commenced. Northern Ireland is the only part of the UK without an operating contaminated land regime.

I ask DfC to:

- add land remediation and land husbandry to aim 6, and work with DAERA on commencing Part III or, until then, issuing joint guidance on investigating and remediating historic sites;
- require heritage-sensitive remediation, with archaeological advice before ground works on designated or recorded sites;
- include ground condition and contamination in the heritage at risk survey, so the register shows why sites are at risk, not only that they are;
- support owners and community groups with site investigation through the Historic Environment Fund, because a desk study and basic ground investigation often unlock everything else.

Annex B tests these points against Northern Ireland's twentieth-century communications and defence sites, almost none of which is designated, interpreted or looked after as heritage.

2. The historic public realm (aims 4, 7, 12 and 15)

The consultation paper does not mention streets, squares or public spaces, yet that is where most people meet the historic environment every day, free of charge. 80% of adults in the least deprived areas visit historic places, against 51% in the most deprived. Everyday access through historic streets, parks and the foreshore is the cheapest way to close that gap.

The Public Realm (Framework and Entitlement) Bill I am preparing would set a continuous improvement duty and minimum entitlements for public space, and would let part of the uplift in land value that public investment creates be captured for upkeep. Heritage, planning and regeneration are transferred matters, so any such provision affecting Northern Ireland would need the Assembly's consent. A DfC policy that names the historic public realm would make that framework, or a Northern Ireland equivalent, easier to build. I ask DfC to:

- add the historic public realm to aim 4, covering surfaces, street furniture, shopfronts, signage, historic parks, harbours and the foreshore;
- name the Department for Infrastructure (roads, street works, signage) and councils (planning, parks, harbours, Local Development Plans) as partners under aim 12, since most change to historic streets comes from them;
- set a target under aim 7 for closing the visit gap by deprivation.

3. Access to the historic environment (aims 7, 8, 9 and 12)

Northern Ireland has the weakest public access rights in these islands. There is no right of responsible access as in Scotland, and the Access to the Countryside (Northern Ireland) Order 1983 gives councils a duty to assert, protect and record public rights of way that has produced very few recorded routes. Most hill, coast and forest walking depends on permissive access, on Forest Service and National Trust land, or on the goodwill of farmers. The Ulster Way, the Mourne Wall, the Causeway Coast Way, the Glens, the Sperrins and almost every site in Annexes A and B are reached that way.

That is a heritage problem as much as a recreation one. A monument nobody can lawfully reach is not being visited, interpreted or watched over, and the wellbeing, education and tourism outcomes in aims 7, 8, 10 and 13 all assume people can get there. I ask DfC to:

- make access a stated objective of the policy, and work with DAERA, DfI, councils and Outdoor Recreation NI on a programme to record public rights of way to designated and recorded heritage sites and to agree permissive routes where none exist;
- write public access into every grant, lease, licence and asset transfer the policy touches;
- treat the forest parks, the AONB path networks and the long-distance trails as heritage infrastructure, and the hiking, orienteering, scouting and guiding movements that use them as heritage partners.

4. The working heritage: Northern Ireland's historic economy and recreation (aims 2, 4, 10, 13, 15 and 16)

The consultation paper's heritage is mostly architectural and archaeological. Northern Ireland's is mostly industrial, agricultural and sporting, and that is where the economic case for the policy lies. Linen made the Lagan and Bann valleys; shipbuilding and engineering made Belfast; granite, basalt, limestone, iron ore, salt and coal made the Mourne, the Glens and the Causeway Coast; flax, apples, potatoes, cattle, eels and herring fed the towns; and Gaelic games, rugby, football, boxing, golf, road racing, fairs, theatre and music filled the time left over. Almost all of it survives in the landscape: mill villages and beetling mills, slipways and cranes, quarry faces and the Mourne Wall, orchards and flax dams, harbours and eel weirs, grounds and halls, forest parks and links courses.

Three things follow. First, this is the heritage most people in the most deprived areas actually have, and it is the heritage of both traditions and neither. Second, almost none of it is designated, and most of it is on land with the contamination and access problems described in sections 1 and 3. Third, it still earns money: four protected food names, the Open Championship at Royal Portrush, the Fleadh Cheoil in Belfast in 2026, the forest parks, the links courses and the grounds are the visible part of a heritage economy that the policy should name, measure and build on. Annex A sets out each strand with sites, the risk and a specific ask. In summary I ask DfC to:

- add industrial, agricultural, maritime and sporting heritage to aim 1 as named designation themes, starting with the linen industry, shipbuilding and engineering, extractive industry, the fisheries and the sporting estate;
- under aim 2, treat the traditional trades these places need — thatching, dry-stone walling, millwrighting, boatbuilding, flax processing, linen weaving — as the skills programme, alongside

the building trades;

- under aim 10, work with Tourism NI, Sport NI and the governing bodies on heritage-led routes that join the working sites to the streets and foreshore in section 2;
- under aim 16, count the heritage economy: protected food names, sporting events, forest and coastal visits and the businesses trading from historic buildings, so the catalytic value of heritage investment is measured where it is largest.

5. Heritage at risk: targets and tools (aims 1, 3, 4 and 16)

Only 24% of recorded heritage assets are designated, and condition is falling. The policy should:

- set a target to bring the at-risk count back to its 2018/19 level within the policy period, with annual reporting;
- set out how repair and enforcement powers will be used where owners neglect listed buildings;
- make community ownership part of the policy, drawing on DfC's own community asset transfer framework, so groups can take on surplus public historic buildings and land — former schools, courthouses, police stations, barracks and hospitals among them;
- under aim 16, measure how heritage investment raises nearby land values, so part of that uplift can be captured for long-term care;
- set out how DfC will respond if the UK Government's review of National Lottery good causes reduces heritage funding, and press HM Treasury on VAT on repairs to historic buildings.

6. Carbon and climate (aims 2 and 6)

Re-using a historic building keeps the carbon already spent on it. The policy should count embodied carbon whenever repair is weighed against demolition, give clear retrofit guidance for listed buildings and conservation areas, link to the Climate Change Act (Northern Ireland) 2022, and train the traditional building skills workforce alongside the retrofit workforce, which needs the same people. Peatland restoration under the Peatland Strategy should be planned with the historic environment in view, since the bogs are also archives.

7. Transparency (Conservation Principles 5 and 6, aim 14)

The Conservation Principles commit to decisions that are “reasonable, transparent and consistent” and documented. I ask DfC to publish heritage at risk and condition data as open data each year, a public record of designation and consent decisions, and an annual report against measurable targets. Please also publish a summary of responses to this consultation and DfC's decision on each aim within twelve weeks. Of the 20 DfC consultations that closed since April 2025, I could find a published outcome for only one.

The vision

I support the vision's direction, but “delivers for Northern Ireland” should say what it delivers. A suggested wording: *“Our People. Our Past. Our Place: a shared and cared-for historic environment that everyone can reach, and that helps every part of Northern Ireland thrive.”*

Strategic Environmental Assessment

The assessment should treat the decline in condition as an environmental effect in its own right, compare the carbon cost of losing historic buildings with re-using them, and assess the effect of contaminated ground on historic sites and of remediation on buried archaeology.

I would be glad to discuss any of these points with officials.

Yours faithfully,

Annexes

- Annex A — The working heritage: strands, sites and asks
- Annex B — Communications and defence sites; the coast, the Crown Estate, Lough Neagh and the protected landscapes; two landmarks near Larne
- Annex C — Views on the vision and each aim (for the online form)

Each strand below gives the places, the point at which heritage, land and economy meet, and one ask tied to the policy's aims. The sites are well-known public ones; none is cited from private work.

A1. Linen and flax (aims 1, 2, 4, 6, 16). Linen made the Lagan and Bann valleys and most of the towns between them. Its heritage is a whole landscape, not a building type: flax fields, flax dams and lint holes, scutch mills on every stream, beetling mills such as Wellbrook near Cookstown, bleach greens, spinning and weaving mills, and the model villages built around them at Sion Mills and Bessbrook. The industry's two ends show the policy's two problems. Mossley Mill in Newtownabbey and Conway Mill on the Falls Road show re-use working, one as a council headquarters, one as a community enterprise. Herdman's mill at Sion Mills, closed since 2004 in a village that is itself a conservation area, Hilden Mill in Lisburn, closed in 2006, and the former Bessbrook Mill, a linen mill and then an Army base until 2007, show the scale of what is empty: large, listed, probably contaminated by a century of bleaching, dyeing and oil, and beyond any community group without the site investigation support asked for in section 1. Flax is also a live crop again, grown and woven by a handful of small Northern Ireland makers for a low-input, high-value textile. *Ask: make the linen industry the first thematic designation programme under aim 1, from field to mill; fund site investigation of the big empty mills under aim 6; and treat flax growing, scutching and weaving as skills under aim 2.*

A2. Shipbuilding, engineering and aviation (aims 1, 4, 10, 16). Harland and Wolff's yard, founded in 1861, built the Olympic-class liners and most of what Belfast was known for; Workman Clark beside it was once the largest yard in the world by tonnage. The Titanic slipways, the Thompson dry dock and pump house, the drawing offices (now a hotel) and the Samson and Goliath cranes, scheduled monuments and still working, are the designated core. Around them sit the engineering heritage that fed the yards and the mills — the Sirocco Works site, the former Mackie's foundry on the Springfield Road, the old Belfast Ropeworks, the first Shorts aircraft factory of 1936 — and the Sailortown and Cathedral Quarter development areas now being masterplanned by the council. The yard itself passed through administration in 2024 before its sale, which is a reminder that working industrial heritage can lose its operator in a single year. *Ask: under aim 12, name the Belfast Harbour Commissioners and the yard's owner as heritage partners; under aim 4, write the historic public realm — the slipways, quays and dock walls — into the Sailortown and City Quays masterplans; under aim 16, measure what Titanic Quarter has done to land values and use it as the test case for capture.*

A3. Quarrying, mining and minerals (aims 1, 6, 9, 10). The Mourne were quarried for granite that paved Belfast and Liverpool and built the 35-kilometre Mourne Wall between 1904 and 1922; the Glens of Antrim were mined for iron ore and bauxite from the 1870s to the 1930s, leaving adits, tramways and the pier at Red Bay; Ballycastle had a coalfield worked for three centuries; Carrickfergus has mined salt since the 1850s and still does at Kilroot; Conlig and Whitespots near Newtownards were lead mines whose engine house is now a scheduled monument in a country park; Scrabo gave Newtownards its sandstone and its tower; Magheramorne beside Larne Lough was a cement works until 1980 and is now a quarry awaiting a future. The Sperrins hold gold, and the question of whether to mine it at Curraghinalt went to a public inquiry. Every one of these is land with a legacy in the ground, and every one is also a walked, climbed or visited place. *Ask: under aim 1, record extractive heritage as a theme and map the quarry and mine sites against the ASSIs and AONBs; under aim 6, make mineral and quarry restoration plans include heritage recording; under aim 9, recognise the Mourne Wall and the Glens mineral railways as historic landscape features.*

A4. Timber, forests and demesnes (aims 2, 6, 9, 13). Northern Ireland has one of the lowest woodland covers in Europe, and most of what is old and native survives in the glens and demesnes — Breen, Banagher Glen, Rostrevor's oakwood, the estate woods at Castlewellan, Tollymore,

Gosford and Glenarm. Tollymore became the first state forest park in 1955 and the forest parks have been the public's countryside ever since, with their arboretums, follies, bridges and walls as much a part of the heritage as the trees. They are also where camping, orienteering, Scouting and school outdoor education happen, and where the Castlewellan treetop walk is now being consulted on. Timber is a heritage material too: thatch, oak frames, mill machinery and boats all need it and the trades that work it. *Ask: under aim 9, treat the forest parks and demesne woodlands as historic designed landscapes and name the Forest Service as a heritage partner; under aim 2, add the timber and thatching trades to the skills programme; under aim 13, use the forest parks as the outdoor classroom the policy's education aim needs.*

A5. Peat and the bogs (aims 6, 9, 14). Turf cutting under turbary rights shaped the uplands and the lowland raised bogs for centuries, and the bogs in turn preserved the pollen, timber trackways, bog butter and bog bodies that are the oldest archive Northern Ireland has. Peatlands Park near Dungannon was a commercial peat works with its own narrow-gauge railway before it became a country park; the Garron Plateau above the Glens is one of the largest intact blanket bogs in these islands; Ballynahone and Sluggan are raised bogs of European importance. The Peatland Strategy will restore much of this ground for carbon and nature. *Ask: under aim 6, ask DAERA to include archaeological assessment in peatland restoration plans so that drain-blocking and re-wetting do not disturb what the bog has kept; under aim 14, record the turbary landscape and the peat industry's remains before they are reclaimed.*

A6. Food, drink and farming (aims 2, 4, 10, 16). Northern Ireland has four protected food names and every one is a historic landscape: Armagh Bramley apples, grown in the orchard country since the seventeenth century; Comber Earlies, potatoes from the Strangford shore; Lough Neagh eel and Lough Neagh pollan, from a fishery with medieval roots and weirs still worked at Toome. Around them sit the market houses and St George's Market, the corn mills the councils have restored at Annalong and elsewhere, the creameries and bakeries, Bushmills with its 1608 licence and a distilling revival that has put a working distillery into Crumlin Road Gaol, and a crisp factory that has worked from Tandragee Castle since 1956. Farming's living heritage includes the Irish Moiled, Ulster's own rare cattle breed, with Dexter and Kerry cattle used alongside it for conservation grazing of ASSIs and monuments; native Irish honey bees and the heather honey of the Mourne, Sperrins and Antrim plateau; and the bee boles still set in demesne walls. The Ould Lammas Fair at Ballycastle, selling dulse and yellowman since the seventeenth century, is the oldest of the fairs that joined all this to the towns. *Ask: under aim 10, build food heritage trails on the protected names; under aim 2, treat rare-breed husbandry, orcharding and traditional food production as heritage skills; under aim 16, count the businesses trading from historic buildings as heritage economy.*

A7. Fishing, harbours and the coast (aims 1, 9, 10, 12). Kilkeel, Ardglass and Portavogie are the three fishing ports, Ardglass with a harbour history back to the medieval herring trade; Strangford and Carlingford Loughs and Lough Foyle grow oysters and mussels; the Bann, the Bush and the Foyle are salmon rivers whose weirs, fish passes and mill races are heritage and habitat together. The harbours of the Antrim coast — Carnlough, built for the limestone trade with its tramway arches over the street, Glenarm, Red Bay, Portrush — and the lighthouses at Rathlin West, St John's Point and Blackhead, run by the all-island Commissioners of Irish Lights, mark where industry met the sea. Causeway Coast and Glens Council has just consulted on a ten-year harbours and marinas strategy and Mid and East Antrim on changes to Carnlough harbour car park: these are live decisions about historic public land. The Loughs Agency, a North/South body, manages the Foyle and Carlingford fisheries. *Ask: under aim 12, name the harbour authorities, the Loughs Agency and Irish Lights as partners; under aim 1, record the fishing and harbour heritage as a theme; under aim 9, treat the working harbours as historic public realm under section 2.*

A8. Sport and the sporting estate (aims 4, 7, 10, 13, 15). Sport is where Northern Ireland's heritage is most used and least recognised. Royal Portrush, founded in 1888, hosted the Open

Championship in 1951, 2019 and 2025; Royal County Down dates from 1889; Ardglass plays from a clubhouse in a fifteenth-century castle; and the links at Portstewart and Castlerock sit on dune systems that are also ASSIs — the courses are historic designed landscapes on protected ground. The Gaelic Athletic Association has organised here since 1884, and its grounds, handball alleys and clubrooms are the social heritage of half the population; the hurling tradition of the Glens of Antrim is as old as the parishes, and the Casement Park question has shown how hard it is to rebuild a historic ground. Rugby has played at Ravenhill since 1923; the Irish Football Association, founded in 1880, is one of the oldest in the world, and Cliftonville, Linfield and Glentoran play from grounds a century old. Boxing is the sport of the inner city: Rinty Monaghan, world flyweight champion in 1947, has his statue at Cathedral Gardens, the King's Hall of 1934 saw Barry McGuigan's world title in 1985 and has been kept in the redevelopment of its site, and clubs such as Holy Family, Immaculata, Holy Trinity and Midland work from old halls in the most deprived wards. Road racing has run the North West 200 since 1929 and the Ulster Grand Prix at Dundrod since 1922; racing at Down Royal rests on a charter of 1685; the Royal Ulster Yacht Club has sailed from Bangor since 1866. *Ask: under aim 1, record the sporting estate — grounds, courses, halls, alleys and courses' dune systems — as a theme and designate the best; under aim 12, name Sport NI and the governing bodies as heritage partners; under aim 15, recognise that the boxing clubs, the grounds and the fairs are where shared and single-identity heritage meet, and fund their buildings accordingly.*

A9. Walking, camping, scouting and the outdoors (aims 7, 8, 9, 13). The Ulster Way, first walked in the 1970s and relaunched in 2009, the Mourne Wall walk, the Causeway Coast Way and the Lecale Way join almost every site in this annex. Scouting and Guiding have camped in Northern Ireland since before 1910, from Crawfordsburn and Lorne to the forest parks; orienteering has permanent courses in the forests; the Duke of Edinburgh's Award, Tollymore National Outdoor Centre and the outdoor education centres take tens of thousands of young people a year onto heritage land. Fair Head is the largest climbing crag in Ireland and climbs under an access agreement with its farmers; the Cuilcagh boardwalk and the Marble Arch Caves Geopark show both the demand and the strain. All of this depends on the permissive access described in section 3. *Ask: under aim 7, count outdoor recreation as heritage visiting and the outdoor movements as heritage audiences; under aim 8, join heritage interpretation to the trails and forest parks; under aim 9, protect the Ulster Way corridor and the Mourne Wall as historic routes.*

A10. Theatre, music, arts and the fairs (aims 4, 7, 13, 15). The Grand Opera House of 1895, Grade A listed and restored in 2021, the Ulster Hall of 1862 and the Lyric are Belfast's stages; Omagh's Strule Arts Centre, Enniskillen's Ardhoven, Armagh's Market Place, Derry's Millennium Forum and Coleraine's Riverside are the towns'. The Linen Hall Library has read since 1788; Armagh Observatory since 1790. Seamus Heaney HomePlace at Bellaghy was built on the site of a former police station, a surplus public site turned cultural anchor. The Strand in east Belfast, a 1935 cinema, has been restored as an arts centre; the Ulster Folk and Transport Museum and the Ulster American Folk Park keep the buildings of the working heritage above. Belfast is a UNESCO City of Music, Derry was UK City of Culture in 2013, and the Fleadh Cheoil na hÉireann in Belfast in August 2026 brought hundreds of thousands onto the city's historic streets under a major event order. Marching bands, pipe bands, the Lambeg, the uilleann pipes, murals and the fairs are the intangible heritage of both traditions, and they all need halls, squares and streets. *Ask: under aim 4, treat the halls, theatres and cinemas as heritage-led regeneration anchors; under aim 7, use the fairs and festivals as the free, everyday route into heritage for the 51%; under aim 15, fund the shared venues where music and sport cross the community line.*

A11. What this adds up to. The working heritage is where the policy's economic, wellbeing and good-relations aims can be met together and at low cost, because the places already exist, already have audiences, and already earn. It is also where the risks in sections 1 and 3 are concentrated: contaminated ground at the mills, yards, quarries and bogs, and no lawful public access to most of the rest. A policy that designates the castle and the country house but not the mill, the yard, the

ground and the links will have described the heritage of the few and missed the heritage of the many.

Annex B — Communications and defence sites; the coast, the Crown Estate, Lough Neagh and the protected landscapes; two landmarks near Larne

B1. Northern Ireland's twentieth-century communications and defence heritage (aims 1, 4, 6, 9, 13, 14). To test section 1 against real places, I have looked at the BBC and Post Office radio stations, the Second World War radar chain and airfields, the US Navy's wartime and Cold War stations, the civil defence bunkers and the network of Royal Observer Corps underground posts across the six counties. None of these is a castle or a country house. Together they record a century of Northern Ireland's part in broadcasting, the Battle of the Atlantic, NATO anti-submarine work and the civil defence of the Cold War, and almost none of it is designated, interpreted or looked after as heritage. Examples from the public record:

- **Mount Eden Park Regional War Room, Belfast**, built 1952–53 as one of the UK's regional war rooms and later the Northern Ireland Regional Government Headquarters, is listed and in public use. It is the Division's own proof that a Cold War structure can be designated, re-used and opened to the public.
- **RAF Murlough Bay**, a 1950s ROTOR radar station on Torr Road, is listed but has been offered for sale and is reported to be in agricultural use with modern masts inside the enclosure. Listing alone has not secured it.
- **RAF Ballykelly / Shackleton Barracks**, opened 1941, whose Coastal Command squadrons fought the Battle of the Atlantic and which flew Shackletons in the NATO anti-submarine role until 1971, keeps a large hangar and control tower on a site zoned for industry since the Army left in 2008.
- **The Chain Home radar sites at Castlerock and Downhill** (1940) survive as transmitter, receiver and transformer buildings, blast walls and generator stands on farmland above the Causeway Coast, undesignated and unrecorded in condition.
- **The US Naval Communication Station at Londonderry** (1942–1977), which supported Allied convoys and later NATO ships, is now Foyle College with a memorial marker; its Benbradagh transmitter site in the Sperrins AONB is concrete remains on an open hill.
- **The Lisnagarvey BBC transmitter** near Lisburn, opened in 1936 as the most powerful medium-wave station in the UK, outlived the medium-wave services it was built for.
- **The Ballymena Regional Government Headquarters bunker** (1990), secret until 2007 and later offered for sale with its oil storage in place; the outcome is not on the public record.
- **The Royal Observer Corps posts** (1959–1991), one or two in every district council area, mostly reverted to farmland on closure; one has been restored by volunteers, the rest are unrecorded and unprotected.

Sites of this kind are useful to the policy in five ways:

- **Historic environment (aims 1, 14).** A dated group of twentieth-century sites that the Defence Heritage Record and the Sites and Monuments Record can check against their own holdings. Most are undesignated; they show where a thematic designation programme for Cold War and communications heritage could start.
- **Public realm (aims 4, 7, 15).** Almost every site stands beside a public road, a summit path, a beach or a town. Interpretation panels, waymarked routes and open days need no ownership change and reach the 51% of adults in deprived areas who rarely visit a paid heritage attraction.
- **Land remediation (aims 6, 9).** Each type of site carries a known legacy to screen before re-use: fuel and oil storage at radio stations and bunkers, transformers at radar sites, airfield fuel and fire-training areas, and former explosives stores. A desk study per site, following the Land Contamination Risk Management framework, would turn a vague fear of contamination into a

known and usually modest problem, and is exactly the kind of work the Historic Environment Fund could support.

- **Environment and climate (aims 2, 6, 9).** Many sites sit on peat, heath and upland grazing in Areas of Outstanding Natural Beauty. Managing them as heritage and as habitat together is land husbandry in practice, and the traditional building skills they need are the retrofit skills the policy already wants to grow.
- **Education and research (aims 8, 13, 16).** Most of what is known about these sites comes from veterans' accounts, enthusiast surveys and newspaper archives; much of that memory is now in its eighties. Oral history, school projects on the Cold War and the Battle of the Atlantic, and a citizen-science survey of the ROC posts are cheap, cross-community and measurable.

B2. The Crown Estate's marine area (aims 9, 12, 16). The Crown Estate holds the seabed around Northern Ireland out to twelve nautical miles and much of the foreshore, together with the bed of Lough Foyle, river and lough beds, fish-farm sites and the rights under which cables and pipelines are laid. Crown Estate property is a reserved matter, so its revenue goes to HM Treasury rather than the Executive, and the Department for the Economy and the Crown Estate have agreed a statement of intent on offshore wind leasing in Northern Ireland waters. That seabed and foreshore is the most densely historic land in Northern Ireland: wrecks from the Spanish Armada to the Second World War convoys, the landing places of the Plantation and the emigrant ships, harbours, salt works, kelp walls, lime kilns, tide mills — Nendrum on Strangford Lough is the earliest dated tide mill known anywhere — coastal batteries and the pilot and coastguard stations that served them. Almost none of it is designated, and offshore wind, cable landfalls and coastal defence works will disturb it within the policy period. I ask DfC to:

- make the Crown Estate a named partner under aim 12, so that heritage conditions, archaeological recording and public access are written into marine leases and foreshore licences at the start rather than argued over later;
- ask that a share of the Crown Estate's Northern Ireland revenue, or of the community benefit from offshore leasing, is directed to the coastal historic environment, as the Coastal Communities Fund once was;
- give the foreshore, where most people meet the sea, the same public-realm treatment proposed for streets in section 2: it is free, it is everywhere, and it is where the deprivation gap in heritage visiting can be closed.

B3. Lough Neagh (aims 9, 12, 16). The largest lake in these islands is the inland counterpart of the Crown Estate point. Its bed and soil are privately owned, its eel and pollan fisheries carry protected food names and medieval history, its shores hold crannogs, monastic sites and the Toome weirs, and its ecological crisis since 2023 has made its governance a public question. Whatever the Executive decides about ownership, the policy should name the Lough's owners, the fishermen's co-operative and the Lough Neagh Partnership as heritage partners under aim 12 and treat the Lough and its shore as a historic landscape under aim 9.

B4. The eight Areas of Outstanding Natural Beauty (aims 9, 12). Antrim Coast and Glens, Binevenagh, Causeway Coast, Lagan Valley, Mourne, Ring of Gullion, Sperrin and Strangford and Lecale together cover a large share of Northern Ireland's land and almost all of its most visited places. Every one is a historic landscape: field systems, raths and cashels, deserted villages, mills, demesnes, quarries, coastal batteries and the radar and radio stations above sit inside them. The policy should name the AONB management bodies and partnerships as heritage partners, and treat the AONB management plans as the place where historic environment, nature, access and local economy are planned together.

B5. Areas of Special Scientific Interest (aims 6, 9). Hundreds of ASSIs cover the finest habitats in Northern Ireland, yet the Office for Environmental Protection reported in 2025 that no new sites

had been designated since 2018 and that the condition of protected features has declined. Many ASSIs are historic environments too: raised and blanket bogs that hold pollen records, bog bodies and trackways; limestone pavement and shell middens; the dune systems under the links courses; the earthworks in the Antrim Hills above Larne and on the Garron Plateau. Land husbandry that restores a bog restores a historic archive at the same time. The policy should ask DAERA to add a historic environment element to ASSI condition monitoring and to the Farming with Nature scheme, so that one visit, one plan and one payment look after both.

B6. Two landmarks near Larne. Both show what the policy must achieve, and the range of ownership it must work with:

- **Kilwaughter Castle**, three miles from Larne, is a seventeenth-century tower house that John Nash extended for Edward Jones Agnew between 1803 and 1807. Seized as enemy property in the Second World War because its owners lived in Italy, stripped for scrap afterwards, and a ruin since the 1950s, it is listed and in private hands; a local schoolboy's campaign in 2013 grew into the Kilwaughter Castle Restoration Group in 2015, and parts of the building are now at risk of collapse. It is heritage at risk, community capacity (aim 3) and the need for repair powers and a revolving fund (section 5), all in one site.
- **Glenarm Castle and demesne**, seat of the McDonnell Earls of Antrim since the seventeenth century on lands the family has held for some four hundred years, is the opposite case: a lived-in house whose walled garden, tea room, Highland games and Dalriada Festival are open to the public and anchor the village economy. I would be glad to help the Division test, with the estate, how a working demesne, the village conservation area, the harbour and the glen's protected habitats can be planned as one place.

B7. What the public gains. Cued up together, these sites and landscapes deliver four of the policy's own outcomes without a single new building:

- **Education (aim 13).** A coast-to-summit curriculum from Larne alone: the foreshore and lough, the Antrim Hills ASSI, the glens' radio and observer sites, the Glenarm limestone and Magheramorne cement works, Kilwaughter and Glenarm cover geology, bog science, the Plantation, the Nash era, the Battle of the Atlantic and the Cold War within ten miles of every school in the borough.
- **Health (aim 8).** Walking the foreshore, the glens and the summit paths is free. Linking heritage interpretation to the existing rights of way and the AONB path networks turns a walk into a visit, which is the cheapest way to reach the 51% in the most deprived areas.
- **Local economy (aims 4, 10, 16).** Glenarm already shows the model; Kilwaughter and the coast show the untapped half of it. Heritage-led visitor routes between estate, village, harbour, foreshore and hill, promoted together, keep spending in the glens rather than passing through to the Causeway.
- **Historic appreciation (aims 1, 7, 15).** None of these sites belongs to one tradition. The Agnews, the McDonnells, the quarrymen, the Post Office engineers and the wartime garrisons are a shared story, which is what aim 15 asks for.

Annex C — Views on the vision and each aim (for the online form)

One or two lines per box, each pointing to the section of the letter that carries the argument.

Item	View	Response
Vision	Support with change	Say what “delivers” means: “a shared and cared-for historic environment that everyone can reach, and that helps every part of Northern Ireland thrive.”
1. Identify and safeguard	Agree	Only 24% of recorded assets are designated. Set a dated designation programme with thematic strands: linen, shipbuilding and engineering, extractive industry, fisheries and harbours, the sporting estate, Cold War and communications (section 4, Annexes A and B).
2. Skilled workforce	Agree	Add the land trades (thatching, dry-stone walling, millwrighting, boatbuilding, flax and linen, rare-breed husbandry) to the building trades, and train them with the retrofit workforce (sections 4 and 6).
3. Owners and volunteers	Agree	Fund site investigation so groups can take on contaminated sites (section 1); add community asset transfer of surplus public heritage (section 5).
4. Re-use and regeneration	Strongly agree	Name the historic public realm — streets, harbours, foreshore, parks — and the working heritage as regeneration anchors (sections 2 and 4).
5. Programme for Government and Wellbeing	Agree	Name the indicators: access to public and green space, town-centre vacancy, the visit gap by deprivation, heritage at risk count.
6. Environmental problems	Agree, but too thin	Add land remediation and land husbandry; commence Part III of the 1997 Order or issue joint guidance; count embodied carbon; plan peatland restoration with archaeology in view (sections 1 and 6).
7. Inclusive access	Strongly agree	Make countryside access a stated objective and record rights of way to heritage sites (section 3); set a target to close the 80%/51% visit gap (section 2).
8. Wellbeing	Agree	Join heritage interpretation to the trails and forest parks; count outdoor recreation as heritage visiting (Annex A9).
9. Landscapes and biodiversity	Agree	Treat the Crown Estate seabed and foreshore, Lough Neagh, the AONBs, the ASSIs, the forest parks and the Mourne Wall as historic environment in their own right (Annex B).
10. Showcasing and tourism	Agree	Build routes on the protected food names, the sporting estate and the working heritage with Tourism NI and Sport NI (section 4).
11. Cross-border and international	Agree	Name the Loughs Agency, Irish Lights and the Geopark as cross-border heritage partners (Annex A7, A9).
12. Partnering with public bodies	Strongly agree	Name DfI, councils, the Crown Estate, the Forest Service, harbour authorities, Sport NI and the Lough Neagh owners as partners (sections 2–4, Annex B).
13. Education	Agree	Use the forest parks, foreshore and working sites as the outdoor classroom; a coast-to-summit curriculum exists within ten miles of every school (Annex B7).
14. Research and records	Agree	Publish heritage at risk and condition data as open data each year; record the extractive, turbary and sporting heritage before it is lost (section 7, Annex A).
15. Peace and good relations	Agree	The working and sporting heritage is where traditions meet; fund the shared venues — boxing clubs, grounds, halls, fairs (section 4, Annex A8, A10).

16. Evidence for heritage investment	Agree	Count the heritage economy — protected food names, sporting events, forest and coastal visits, businesses in historic buildings — and measure land value uplift so part can be captured (sections 4 and 5).
17. Innovation	Agree	Citizen-science surveys of the ROC posts, the handball alleys and the mill sites; open data by default (Annex B1).
SEA	Comment	Treat decline in condition as an environmental effect; compare the carbon of loss against re-use; assess contaminated ground and remediation effects on archaeology.
After the consultation	Request	Publish a summary of responses and DfC's decision on each aim within twelve weeks.