



Department for
Communities
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Historic Environment Division

Guidance on the Historic Environment and Site Allocations in Local Development Plans

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Cover Image: Dromore Mound, Motte
and Bailey in Dromore, Co. Down.

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Historic Environment Division's Aim

“Helping communities to enjoy and realise the value of our historic environment”

We do this by:

- Recording, protecting, conserving, advising, promoting and enhancing its value
- Utilising and growing our specialist knowledge and expertise in collaboration with a wide range of groups and individuals
- Contributing to the Executive's objectives as laid out in the Programme for Government

Our historic environment provides authentic and attractive places which increase our pride, character and identity, lead to improved wellbeing and community engagement, and to prosperity through tourism, investment, skills, regeneration and creativity. It is a precious and finite resource available to present generations, and with appropriate management, to future generations.

The identification of potential sites for development within a Local Policies Plan (the second stage of the Local Development Plan process), is an important step in establishing where change and growth will happen across a council's district area. It provides guidance on the types of development which are appropriate for specific locations within the district.

This document is intended to offer advice to councils and those involved in the process of creating plan strategies and local policies plans in plan making, to help ensure that

the historic environment plays a positive role in place shaping and in allocating sites for development. It offers advice on evidence gathering and site allocation considerations, as well as setting out in detail a number of steps to make sure that heritage considerations are fully integrated in any site selection methodology.

Further information can be obtained from the Department for Communities website: <https://www.communities-ni.gov.uk>

Preamble

The purpose of this guidance document is to support councils in taking forward their Local Development Plans (LDPs), most specifically the second part of the two-stage local development plan process, the Local Policies Plan (LPP). It seeks to assist councils in implementing historic environment legislation, relevant regional guidance within the Regional Development Strategy (RDS 2035) and regional strategic policy in the Strategic Planning Policy Statement for Northern Ireland (SPPS 2015) when developing local policies and site-specific proposals.

Advice contained in Department of Infrastructure (DfI) Development Plan Practice Notes¹, DfC & DAERA Environmental Information and Evidence Guidance² and other Historic Environment Division (HED) planning guidance³ can also assist councils to develop sound policies and proposals, to manage change in positive ways that safeguard the historic environment within their district and where relevant, adjoining council areas. Alternative approaches to the methodology outlined in this guidance may be equally acceptable, provided they are demonstrably compliant with legislation, regional guidance and strategic policy.

The inclusion of sites within a LPP establishes locations for appropriate types of development within a council's district

area. A positive strategy for the historic environment in a LPP which is developed in line with (or having regard to) best conservation approaches (or practice) can ensure that site allocations avoid harming the significance of both designated and non-designated heritage assets, including through effects on their setting⁴. At the same time, the allocation of sites for development may present opportunities for the historic environment. For example, new development may improve community access to, and better reveal the significance of, some heritage assets, or may provide an opportunity to sympathetically conserve and reuse heritage assets including those on the Heritage At Risk register (HAR)⁵, while also addressing dereliction and promoting regeneration.

This document offers overarching advice for each of the key stages in the site allocation process consisting of:

- 1) Evidence gathering
- 2) Site selection
- 3) Site allocation policies

All of these stages relate to the normal course of plan preparation, and do not entail any additional tasks, maximising the effectiveness of the work being undertaken, and the likelihood of the LPP being found sound.

1 Development Plan Practice Notes | Department for Infrastructure (infrastructure-ni.gov.uk)

2 Environmental Evidence and Information - Guidance on Natural and Historic Environment evidence bases (see also [Methodology for Designating Local Landscape Policy Areas](#))

3 Historic Environment Advice and Guidance in the Planning Process | Department for Communities (communities-ni.gov.uk)

4 Guidance on Setting and the Historic Environment | Department for Communities

5 Heritage at Risk | Department for Communities

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1. Introduction

The historic environment comprises all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and deliberately planted or managed flora. Heritage assets are buildings, monuments, sites, places, areas or landscapes identified as having a degree of local, regional or national cultural significance⁶.

Designated heritage assets⁷ are those which have been given formal protected status under legislation or policy.

Historic environment considerations and the potential for impacts on the significance of heritage assets must be taken into account in Local Development Plans.



Figure 1: Enniskillen Castle is an example of a heritage asset which is protected as a State Care Monument and listed building; it is also located within a Conservation Area and an Area of Archaeological Potential. This heritage asset has regional importance and informs the understanding of the history and evolution of the settlement while also contributing to the distinctive character and appearance of the townscape. Land use zonings and key site requirements impacting the castle and its setting should therefore be carefully considered to protect the heritage significance of the site.

⁶ See Conservation Principles Glossary p. 25 - <https://www.communities-ni.gov.uk/publications/conservation-principles-guidance>

⁷ Designated Heritage Assets can be 'A World Heritage Site, State Care Monument, Scheduled Monument, Area of Significant Archaeological Interest, Listed Building, Conservation Area, Area of Townscape/Village Character, Local Landscape Policy Area or Protected Wreck Site.' See HED Conservation Principles Glossary p.24

2. The Historic Environment and Site Allocations

In allocating sites and land uses in local development plans, SPPS paragraph 5.31, states that the proposals must meet the procedural, consistency and coherence and effectiveness tests of soundness, as set out in Development Plan Practice Note 6⁸. The various legislative and policy requirements in relation to the historic environment are set out as follows:

- LDPs should set out a positive strategy to safeguard the historic environment, whilst facilitating development that will contribute to its ongoing **protection, conservation and, where possible, enhancement** (RDS, RG11 and SPPS paragraph 6.3 & 6.4).
- Special regard must also be given to the desirability of enhancing the character or appearance of a conservation area⁹, or preserving its character or appearance where the opportunity to enhance does not arise (SPPS 6.18)¹⁰.
- Development should avoid or minimise conflict between the conservation of a heritage asset and any aspect of the proposal. This should take into account an assessment of the heritage asset's significance. Appropriate weight should be given to an asset's conservation and the more significant the asset, the greater the weight to its conservation should be applied.¹¹
- LDPs must be prepared with the objective of contributing to the achievement of sustainable development (SPPS paragraph 3.3) which means balancing social, economic and environmental objectives (SPPS paragraph 3.4). As such, significant adverse impacts on the three pillars of sustainable development (including the historic environment and therefore environmental impacts) should, where possible, be avoided.
- Councils, when developing local development plans for their district and determining planning applications, are required to be guided by the precautionary approach where there are significant risks of damage to the natural and historic environment (SPPS paragraph 3.9). Decision making should adhere to strategic policy for the historic environment.
- Only where adverse impacts cannot be avoided should mitigation or compensation measures be considered. Any proposals that would result in harm to heritage assets need to be fully informed, justified, and evidenced to ensure they are appropriate, including mitigation or compensation measures.

⁸ Development Plan: Practice Note 6: Soundness

⁹ Planning Act (Northern Ireland) 2011: Section 104

¹⁰ Strategic Planning Policy Statement for Northern Ireland (SPPS)

¹¹ Conservation Principles: Guidance | Department for Communities

- All LDPs should support good design and positive placemaking principles particularly where development proposals have the potential to impact heritage assets and their settings. Key site requirements for site allocations can promote good design and local policies which conserve, protect and enhance the historic environment.
- LDPs should also consider other legislative requirements often related to the planning process, such as Scheduled Monument Consent (SMC) (Article 4, Historic Monuments and Archaeological Objects (Northern Ireland) Order 1995 ('the Order'), excavation licensing (Article 41) and the reporting of newly discovered archaeological objects (Article 42), the unforeseen discovery of which can occur during development.

Site Allocation Process

Stage 1: Evidence Gathering

- 1.1 The site allocation process should be guided by a robust evidence base, which is continually reviewed to ensure the most up to date information is being used during the site allocation process. The authoritative evidence held and maintained by DfC Historic Environment Division (HED) is a key reference for councils when establishing the historic environment baseline for their district area. The suite of HED historic environment digital datasets and overview of information held in the Historic Environment Record of Northern Ireland (HERoNI)¹² is published on the DfC HED website¹³.
- 1.2 This evidence gathering exercise is important to help identify heritage assets affected by LDP proposals and should initially take the form of a desktop analysis of heritage assets on the Historic Environment Record of Northern Ireland and historic mapping. Historic environment evidence bases can also meaningfully contribute to other council strategies, plans and programmes where there are acknowledged synergies and relationships, e.g. tourism, landscape, urban regeneration, health and well-being, biodiversity and wider cultural heritage initiatives.
- 1.3 The desktop analysis can also identify gaps in the evidence base where there may be a need to produce further information in order to fully understand the potential impacts of site allocations on the historic environment. In addition to collating, reviewing and updating existing evidence, councils should therefore commission, where relevant, new research to gain an increased understanding of historic environment considerations within their plan area. Councils may hold other data which will contribute to the baseline information and discussions with community groups and heritage organisations may, in some cases, also offer further evidence.
- 1.4 The evidence gathered should relate to all heritage assets, both designated and non-designated, in accordance with the policy framework of the SPPS. It should be used at all stages of the plan making process to demonstrate soundness and inform the Sustainability Appraisal and Strategic Environmental Assessment.

¹² Historic Environment Record of Northern Ireland (HERoNI) | Department for Communities

¹³ Historic Environment Digital Datasets | Department for Communities (communities-ni.gov.uk)

The application of a comprehensive historic environment evidence base is important for councils to:

- Understand the significance of the historic environment within their district area as well as the main issues and challenges facing the area's historic buildings, monuments, places and landscapes.
- Develop a distinctive vision for historic places and heritage assets within the plan area which will deliver on the plan's aims and objectives, taking into account plans and proposals of adjoining councils. This can be particularly important where heritage assets or their settings extend across council boundaries.
- Undertake characterisation work to understand the historic context of the district's cities, towns, villages and settlements, and how heritage assets (e.g. buildings, monuments, open space, streets, routeways) combined with natural heritage assets, have shaped the evolution of a place and its local distinctiveness.
- Assess the potential impact of site allocations on historic places and use this to inform the assessments of an area's suitability to accommodate development.
- Identify opportunities for the historic environment to enrich place shaping and to deliver social, economic and environmental benefits through regeneration, including sustainable reuse of heritage assets, prioritising those on the Heritage At Risk register.
- Identify evidence information gaps and inform the need for further commissioned research/studies, such as statements of significance for key heritage assets and assessments of the impact of plan allocations on both the physical remains and the settings of heritage assets. These surveys are likely to require a combination of desk-based assessment and fieldwork/survey undertaken by appropriately qualified and competent practitioners and using nationally recognised standards and guidance.
- Inform and justify the 'soundness' of the plan in accordance with DfI Plan Practice Note 06: Soundness.



Figure 2: The village of Clogher is an example of an historic settlement that has evolved over hundreds of years along the historic linear routeway through the village. The above image is taken over the ancient Clogher Iron Age Hill Fort, a scheduled and state care monument, with views to St. Macartan's Cathedral (Grade A listed building) and the 18th-century Clogher Historic Park (Grade A) to the right. There are a large number of listed buildings, industrial heritage features and archaeological sites and monuments within and around the village. Settlement and character appraisals informed by the evolution of the place and historic environment considerations are particularly important for historic settlements such as this one when considering any extensions to the settlement limit, zoning lands and preparing any associated Key Site Requirements.

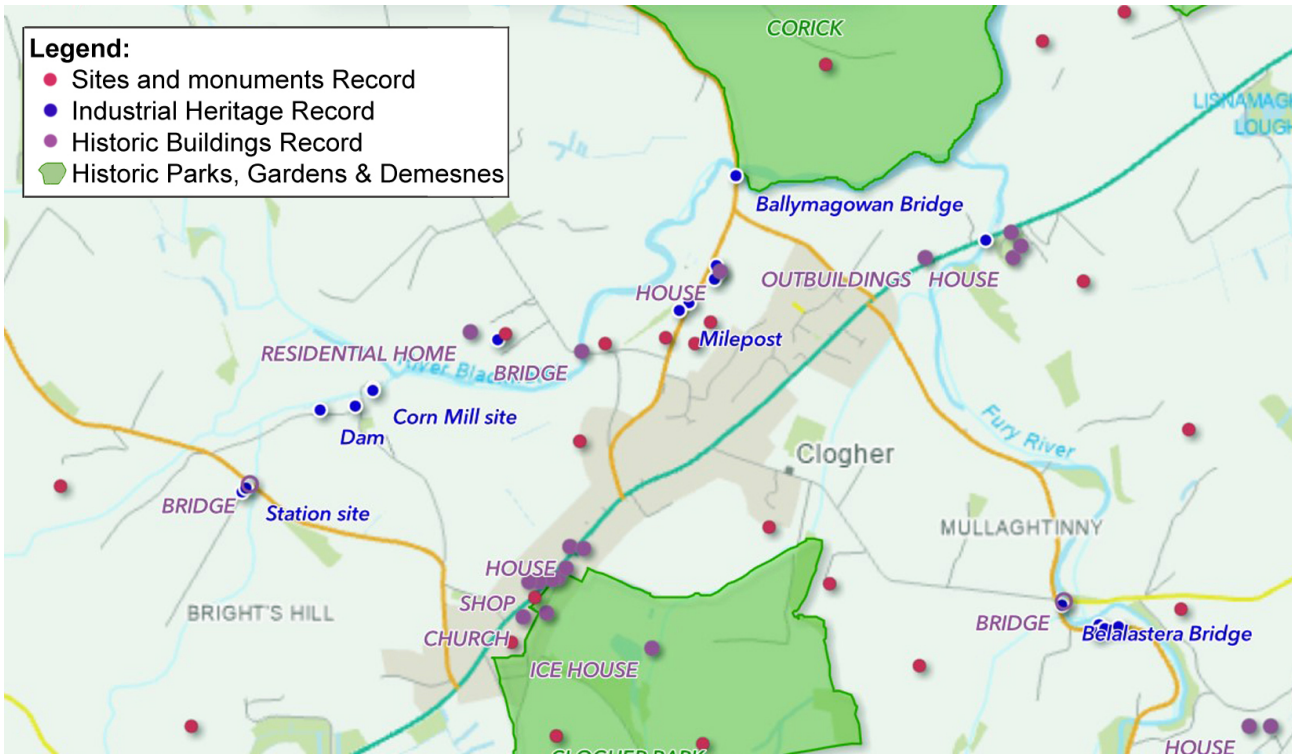


Figure 3: DfC HED Historic Environment Digital Datasets are available to view on the HED map viewer¹⁴, as shown above for the Clogher area. Heritage assets and protections are added as separate colour coded layers which can be switched on and off as applicable. The above map shows the layers applied for four heritage asset records, though other records e.g. Defence Heritage or Marine Heritage, may also be present.

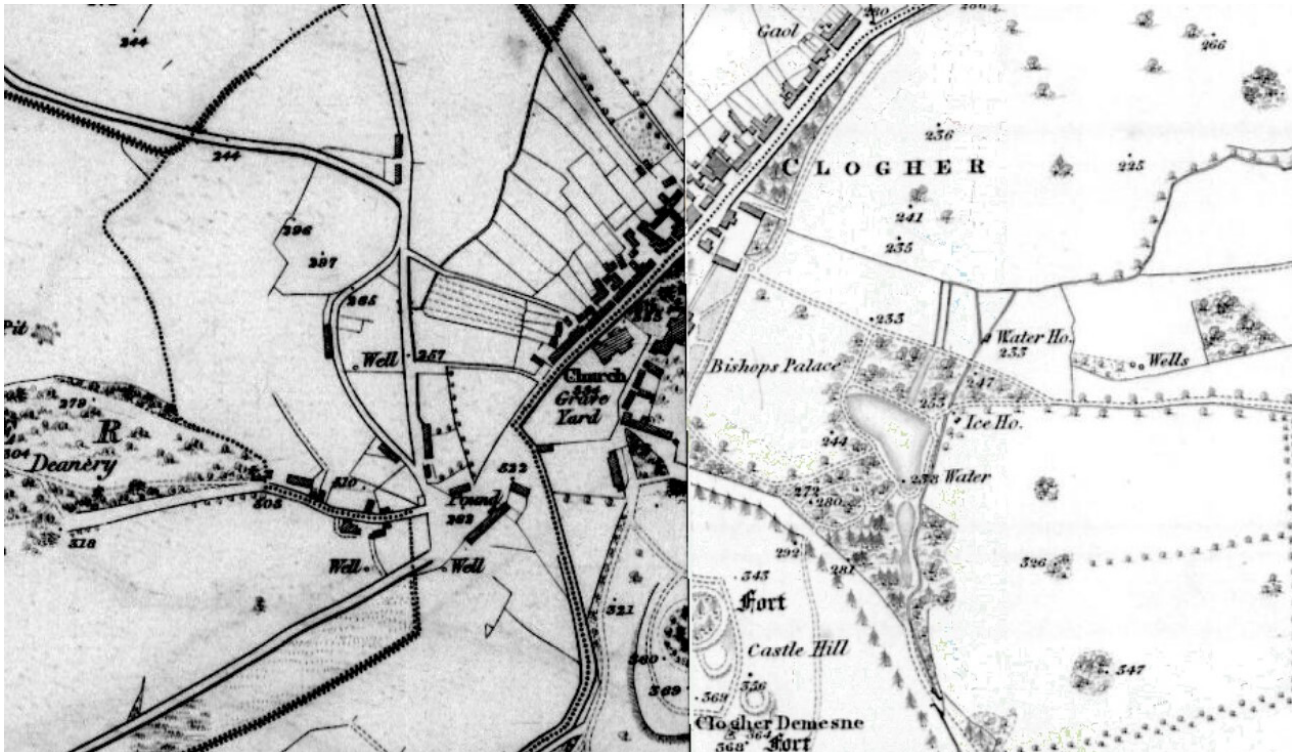


Figure 4: Historic maps and the Department's Gazetteer of Historic Nucleated Urban Settlements¹⁵ will be of assistance in understanding the evolution of historic settlements. This Ordnance Survey map shows Clogher in c.1830 (Ordnance survey 1st edition). © Crown Copyright & Database Right 2025 – SpatialNI - A service provided by Ordnance Survey of Northern Ireland®

14 Historic Environment map viewer | Department for Communities

15 The Gazetteer of Historic Nucleated Urban Settlements | Department for Communities

Stage 2: Site Selection

2.1 The integration of heritage assets and archaeological sites within concept proposals can enhance good quality site specific design and place shaping. The site selection process needs to be detailed enough to:

- Support the inclusion of appropriate sites for development or regeneration (including those which could enhance the historic environment), or:

- Justify the omission of a site where there is identified adverse impact (SPPS paragraph 5.1) and:
- Set out clear criteria for sites that are acceptable in principle, within which they can be appropriately developed in terms of impact on heritage assets and their settings, for example, the size, height, location, design, or density of the development.



Figure 5: Image of Armagh city, with a Scheduled windmill in the foreground, the ancient routeway to Navan Fort (the “Bothareme”) overlain by the modern road, on the left side of windmill, Armagh Cathedral (Grade A listed building) to rear left and St. Malachy’s Church (Grade B listed building) to rear right. These assets are of regional importance and are distinctive features within the Armagh skyline. Site allocations for development potentially affecting the setting of each heritage asset and the interrelationships between them, should be understood to inform the suitability of land use zoning and any required local policies or key site requirements to conserve, protect and enhance heritage assets potentially impacted by proposals.

2.2 It is important to appreciate the significance of any heritage assets that would be affected by a potential site allocation. This involves more than identifying known heritage assets within a given distance, but rather a more holistic approach which seeks to understand their significance and value, and which considers and articulates where there is uncertainty in this respect.

2.3 Whilst a useful starting point, a focus on distance or visibility alone as a gauge of impact is not appropriate. Site allocations which include a heritage asset (for example a site within a World Heritage Site, Conservation Area, Historic Park, Garden and Demesne or Area of Significant Archaeological Interest) may offer opportunities for enhancement and tackling Heritage at Risk. Conversely, in some instances an allocation at a considerable distance away from a heritage asset may cause harm to its significance (for example tall structures can negatively impact the setting of a heritage asset many metres or km from the allocation area), reducing the suitability of the site allocation in sustainable development terms.

2.4 The steps laid out in the Site Selection Methodology in Section 3 can assist regarding site selection. In addition, the HED '**Conservation Principles**' and '**Guidance on Setting and the Historic Environment**' also offer a non-exhaustive list of factors to consider when assessing the potential impacts of development upon heritage assets and their settings.

Stage 3: Site Allocation Policies

3.1 Site allocation policies are a positive feature of a Local Policies Plan as they can highlight the specific criteria against which a development needs to be judged and thereby speed up the implementation process, providing clarity for a wide range of audiences. It is recommended that the policy and/or supporting text provides clear references to the historic environment and specific heritage assets where appropriate.

3.2 The level of detail required in a site allocation policy will depend on aspects such as the nature of the development envisaged and the size and complexity of the site. However, it ought to be detailed enough to provide information on what the expected capacity, density and scale of the development is, where it will happen within the site and when development will come forward, including phasing. Additional mitigative requirements and enhancement measures¹⁶ identified as part of the site selection process and evidence gathering are best set out within the policy to ensure that these are implemented.

3.3 Design principles (and design codes) and key site requirements are a helpful way of making development more sustainable and to guide applicants on what may be acceptable, particularly where there are potential direct and indirect impacts on the historic environment. These can be set out in a site-specific policy (or appropriate equivalent) and will guide future masterplans and planning applications.

¹⁶ Such as requirements to retain or improve access to a heritage asset, provision of interpretation for the asset and improvements to the physical remains or setting of a heritage asset.

3.4 Where development is considered acceptable in principle, following settlement appraisals and assessment of appropriate land use, site allocations policies can set out development parameters such as the density, scale, height, form, massing and materials within the setting of a heritage asset. Where there is potential for direct impacts, for example on previously unencountered archaeological remains on a site, allocation policies can consider mitigation for assessment.

3. Site Selection Methodology

STEP 1 Identify which heritage assets are affected by the potential site allocation

- This should be informed by the evidence base, heritage expertise from appropriately qualified and competent practitioners and, where needed, site surveys.
- Within the site allocation boundary all heritage assets identified will need to be considered in respect of potential for direct impacts. It is also important to consider the potential for impact on previously unrecorded heritage assets.
- Heritage assets that lie outside of these areas may also need identifying and affording careful consideration for impacts, such as negative impacts on their setting. (For areas zoned for tall structures a wider study area would be appropriate).

STEP 2 Understand what contribution the site (in its current form) makes to the significance of the heritage asset(s) including:

- Understanding the contribution the site and any historic boundaries¹⁷ makes to the setting of the heritage asset; the physical space that is part of, and contributes to, its significance and distinctive character, and through which the asset may be seen, experienced, understood and enjoyed as well as its cultural and intellectual associations.
- Understanding the relationship of the site to the heritage asset, which is not

solely determined by distance or inter-visibility (for example, the impact of noise, dust, vibration or flicker).

- Recognising that mitigative measures, such as a Heritage Impact Assessment, may be required due to the nature of the heritage assets and/or the lack of existing information.
- For a number of assets, it may be that a site makes very little or no contribution to significance.

STEP 3 Identify what impact the allocation might have on that significance, considering:

- Location and siting of development, e.g. proximity, extent, position, topography, relationship, understanding, key views.
- Form and appearance of development, e.g. prominence, density, height, scale, massing, alignment, materials, movement.
- Other effects of development, e.g. noise, odour, vibration, lighting, changes to general character, access and use, landscape, context, permanence, cumulative impact, ownership, viability and communal use.
- Secondary effects, e.g. increased traffic movement through historic town centres as a result of new development.
- Whether further mitigative measures may be required in the context of developing key site requirements, such as a Heritage Impact Assessment and/or Archaeological Assessment.

¹⁷ For example, townland boundaries, or historic boundaries as evidenced on historic maps.

STEP 4 Maximising enhancements and avoiding adverse impacts:

Maximising enhancement (including through the use of key site requirements) such as:

- Local policies which support the principles of good design and place shaping so new development and land uses enhance and enrich historic places and settlements.
- Public access and interpretation of heritage assets which enhance understanding and enjoyment for both community and tourism needs.
- Inclusion of historic environment considerations within allocations to allow for the increased understanding through research, evaluation, and recording and realising public benefit through this.
- Repair/regeneration of heritage assets in line with conservation principles.
- Removal of heritage assets from the Heritage At Risk Register through sympathetic conservation and reuse.
- Better revealing of significance of assets, e.g. through introduction of new viewpoints and access routes, use of appropriate materials, public realm improvements, shop front design.

Avoiding Adverse Impacts (including through the use of key site requirements) by:

- Identifying reasonable alternative sites.
- Amendments to site boundary, extent and types of development.
- Relocating development within the site.
- Conserving the setting of heritage assets, through strengthening consideration of heritage at the early design stage.

- Identifying design requirements including open space, landscaping, protection of key views, density, layout and heights of buildings.
- Mitigative measures requiring Heritage Impact Assessments and/or Archaeological Assessment to be undertaken as part of the planning application process. This can be particularly important in instances where there may be potential for encountering previously unidentified archaeological remains on greenfield sites.
- Addressing infrastructure issues such as traffic management.
- Inclusion of site-specific requirements relevant to the significance and nature of the heritage asset.

STEP 5 Determine whether the proposed site allocation is appropriate and satisfies the tests of soundness.

Proposals should be:

- Positively prepared in terms of meeting objectively assessed development and infrastructure needs where it is reasonable to do so, and consistent with achieving sustainable development (including the conservation of the historic environment).
- Justified in terms of any impacts on heritage assets, when considered against reasonable alternative sites and based on proportionate evidence.
- Effective in terms of deliverability, so that enhancement is maximised and adverse impact minimised.
- Consistent with regional strategic policy in the SPPS, including the need to protect, conserve and where possible

enhance heritage assets in a manner appropriate to their significance. Decisions should be clearly stated and evidenced within the Local Policies Plan, particularly where site allocations are put forward where some degree of adverse impact cannot be avoided, and be consistent with legislative requirements.



Figure 6: Key site requirements recognised the potential for encountering archaeological remains at Carrowreagh, Co. Down. Recognition of the need to mitigate potential archaeological impacts on sites will better inform future development proposals, layouts and concept designs, and recording, preservation and protection strategies. Key site requirements for Heritage Impact Assessments and/or Archaeological Assessments can help mitigate the potential financial as well as the environmental costs of development.

4. Glossary of Terms

A full glossary of terms used in this document is available on the DfC Historic Environment Division website:

[Glossary of conservation terms | Department for Communities](#)



“Helping communities to enjoy and realise the value of our historic environment”

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