



An Chomhairle Oidhreachta
The Heritage Council



Submission to the National Planning Framework

November 2017

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Heritage Council NPF 2040 Submission – November 2017 - Executive Summary

The Heritage Council wishes to make five key points regarding the draft National Planning Framework 2040 (hereafter referred to as the NPF 2040). These are consistent with the objectives of the Heritage Council's Strategic Plan 2018-2022 and are elaborated in detail in the body of the submission:

1. *The Heritage Council recommends that Chapter 8 of the draft NPF 2040 'Realising our Sustainable Future' should be given greater prominence at the start of the document. The components of this chapter that deal with greenhouse gas emissions and mitigation and adaptation to climate change and reuse of existing buildings should be given greater priority in the final NPF 2040. We recommend that a fifth 'high level objective' be added to the plan - 'Decisions made through the planning system will ensure that Ireland meets its international legal and ethical commitments to reducing the harmful effects of climate change through the reduction of greenhouse gas emissions of at least 80% (from 1990 levels) by 2050 across the electricity generation, built environment and transport sectors'.*
2. *Chapter 8 covers built, cultural and natural heritage issues as they interact with spatial and economic planning. The care and maintenance of unique built, cultural and natural heritage assets should be highlighted as the basis for responsible resource management and the achievement of sustainable development. All of these assets are interdependent and relate to people and place, thus providing a sense of place and belonging, and indeed identity. The protection of the natural environment, a non-renewable resource, and cultural resources should be prioritised. They should not be looked at in isolation. Government initiatives such as Culture 2025, Creative Ireland, the National Landscape Strategy 2015-2025 and the National Biodiversity Plan all emphasise this point.*
3. *The Heritage Council focuses a considerable amount of its operations and initiatives on the assessment, revitalisation and sustainability of Ireland's towns and villages (both urban and rural villages), including their material value, and socio-economic and cultural role in Irish society. The NPF 2040 should elaborate on these key resources for planning a sustainable, socially-cohesive, efficient and effective future for Ireland.*
4. *Ireland's landscapes, seascapes and associated cultural heritage will experience considerable pressure for change over the lifetime of the NPF 2040. Appropriate monitoring of changes to our landscapes, as defined by the European Landscape Convention (ELC), is a key priority. Such levels of monitoring are not adequate at present. As an element of this monitoring, a consistent process of Landscape Character Assessment (LCA) needs to be devised under the National Landscape Strategy 2015-2025 along with the establishment of a Landscape Observatory of Ireland (LOI)¹.*
5. *Structures and processes for the governance, monitoring and implementation of the National Planning Framework 2040 need to be fully articulated and communicated in order to ensure that the NPF 2040's implementation in the short, medium and long-term, is in accordance with the UNECE Aarhus Convention.*

¹ http://www.heritagecouncil.ie/content/files/Proposals_for_Irelands_Landscapes_summary.pdf

1. INTRODUCTION TO HERITAGE COUNCIL SUBMISSION – NOVEMBER 2017

The Heritage Council is a prescribed authority/body for the purposes of the *Planning and Development Acts 2000-2016*. In addition, the Heritage Council has specific responsibilities under Section 6 of the Heritage Act 1995. For example, Section 6 states that:

'The functions of the Council shall be to propose policies and priorities for the identification, protection, preservation and enhancement of the national heritage, including monuments, archaeological objects, heritage objects, architectural heritage, flora, fauna, wildlife habitats, landscapes, seascapes, wrecks, geology, heritage gardens and parks and inland waterways...'

The Council shall in particular—

- (a) promote interest, education, knowledge and pride in, and facilitate the appreciation and enjoyment of the national heritage,*
- (b) co-operate with public authorities, educational bodies and other organisations and persons in the promotion of the functions of the Council,*
- (c) promote the coordination of all activities relating to the functions of the Council'².*

This detailed draft³ submission sets out the Heritage Council's recommendations in relation to the emerging National Planning Framework (NPF) and deals specifically with Ireland's national heritage as provided for by the 1995 Act. This submission follows on from written submissions made in December 2016 and March 2017.

Since its foundation in 1995, the Heritage Council has undertaken extensive research, policy development and 'pilot' programme formulation, delivery and evaluation, in relation to the management of Ireland's unique national heritage – i.e. Ireland's heritage capital. The Heritage Council welcomes the preparation of the National Planning Framework 2040 and believes that this statutory document represents a major opportunity to consider, analyse and prepare effective evidence-based policy, which can address many of the fundamental issues which will affect the future spatial development of the State and its national heritage up to 2040.

2. A NEW WAY FORWARD – HERITAGE DEFINITIONS, CIRCULAR ECONOMY, VISION, ETC.

This chapter of the Heritage Council's submission is set out under the following headings:

- 1. Heritage Definitions to be included in the NPF 2040;*
- 2. The Circular Economy, Collaborative Society +Integrated Society, etc.*
- 3. Vision – Focus on Choice, Creativity, Quality, Collaboration and Networks;*
- 4. Communicating the 'Do Nothing' Scenario;*
- 5. NPF 2040 High Level Objectives (page 26) - Climate Change and Heritage; and*
- 6. Support for Atlantic Economic Corridor (AEC).*

² This wording will be slightly modified by the Heritage Bill 2017 which is currently before the Houses of the Oireachtas.

³ This draft submission will be presented to the Heritage Council Board for approval at their next meeting in early December 2017.

2.1 Heritage Definitions to be included in the NPF 2040

The Heritage Council recommends that a number of important definitions should be considered for inclusion in the NPF 2040. For example, what is Ireland's National Heritage and why should it be reflected in the National Planning Framework/NPF? This is particularly pertinent in the absence of an up to date National Heritage Plan (NHP):

The Heritage Council is a prescribed body under planning legislation and was set up by the Heritage Act 1995⁴. This legislation defines Ireland's National Heritage as being made up of what is known as built, cultural and natural heritage – in other words – historic landscapes and seascapes (both urban and rural); unique habitats including rivers and loughs; plants and animal species native to Ireland; and museum collections, archives and historical papers, artefacts and objects.

Heritage also includes tangible heritage, i.e. something that you can touch and see, for example, a medieval town wall, market square or historic village green, and intangible heritage, i.e. a process or skill, including folklore/mythology, storytelling and traditional skills such as thatching, stonework and the making of musical instruments. Our National Heritage is an invaluable and finite resource which generates wide-reaching economic, social and community benefits both at home and abroad.

Given the above description of Ireland's national heritage, it would be extremely useful if definitions for built heritage, cultural and natural heritage were provided in the NPF 2040. Definitions are also needed for built capital, cultural capital, human capital, natural capital and social capital. For example, there is a need to define building capital at the start, as the draft NPF 2040 refers on many occasions to land but not buildings and omits the role of landmark historic buildings and historic streets in the sections on urban settlements and rural towns. Indeed, many of these unique heritage assets pre-date the enclosure of land in Ireland. A definition of Ireland's historic environment would also be a welcome addition in the NPF 2040. The Heritage Council will be please to advise further on the development of these definitions.

In addition, the European Landscape Convention⁵ (ELC) aims to encourage public authorities to adopt policies and measures at local, regional, national and international level for protecting, managing and planning landscapes throughout Europe. The ELC proposes legal and financial measures at the national and international levels, aimed at shaping "landscape policies" and promoting interaction between local and central authorities, as well as trans-frontier cooperation in protecting landscapes. The convention sets out a range of different solutions which States can apply, according to their specific needs. The following articles of the ELC are relevant:

ELC Article	Detail
1a Definitions	<i>"Landscape" means an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors....</i>
2 Scope	<i>Subject to the provisions contained in Article 15, this Convention applies to the entire territory of the Parties and covers natural, rural, urban and peri-urban areas. It includes land, inland water and marine areas. It concerns landscapes that might be considered outstanding as well as every-day or degraded landscapes.</i>
5d General Measures	<i>'Integrate landscape into its regional and town planning policies and in its cultural, environmental, agricultural, social and economic policies, as well as in any other policies with possible direct or indirect impact on landscape.'</i>

⁴ The Heritage Act 1995 <http://www.irishstatutebook.ie/eli/1995/act/4/enacted/en/html>.

⁵ <https://www.coe.int/en/web/landscape>

2.2 The Circular Economy, Collaborative Society + Integrated society, etc

Current and predicted levels of volunteerism in Ireland are difficult to measure/estimate since the question was removed from the CSO Census of Ireland questionnaire – a specific question was included in 2006 but not in the 2011 or 2016 Census. Data from the involvement of volunteers in National Heritage Week continues to highlight the significant contribution made by volunteers. as did the level of involvement in the recent Ireland 2016 Centenary Programme.

More research is needed in Ireland as to the value of our social capital and also to ensure that this is reflected in national measurements – Gross Domestic Product (GDP) and Gross National Product (GNP) are increasingly being recognised as being too restrictive and misleading – see recent speech by Prime Minister of New Zealand and statements made by former President Nicolas Sarkozy of France made in 2009 and the findings of the *Report by the Commission on the Measurement of Economic Performance and Social Progress*⁶.

The draft NPF focuses on the ‘**circular economy**’ – this has huge relevance to heritage and existing buildings in our city and town centres as a critical component of a circular economy is ‘reuse and refurbishment/adaptation’. Heritage conservation practice, which concerns itself with ‘prolonging the useful life of things’, must therefore be recognised as making a significant contribution to the NPF 2040. This is particularly relevant given the high vacancy levels in many of our towns and city centres, particularly above the ground floor, as demonstrated by the Heritage Council and Partners’ Pilot National Town Centre Health Check Training Programme 2016/2017. The NPF 2040 needs to address the reuse of existing buildings – not just the development or redevelopment of ‘land’.

The case study on McAuley Place, Naas (NPF Section 5.4, page 81) is a clear case in this regard. However, the connection between the re-use of this historic building and the circular economy is not currently made. We return to McAuley Place in Section 6 below.

The Heritage Council welcomes the statement on page 17 of the NPF ‘...*that there is no justification for the creation of entirely new settlements in Ireland*’. We as a nation should value, celebrate and enhance our historic towns and cities throughout the State – the role of national heritage and heritage agencies is significant in achieving this aim and support for these agencies would be greatly welcomed in the NPF.

In relation to the sustainable management of urban landscapes, the Heritage Council would recommend that the NPF creates a *National Building Stock Monitoring and Analysis Programme* including an analysis of urban ‘Time-Depth’ and densities, as a key national policy objective and links this to the policy drive to regenerate and reduce vacancy levels in the historic core of our settlements including targets for minimum density levels.

In relation to time-depth and age maps, please see the Netherlands for an exemplary case study⁷, as illustrated in *Figures 1 and 2* overleaf.

⁶ <http://www.stiglitz-sen-fitoussi.fr/>

⁷ <https://www.citylab.com/equity/2013/10/delightfully-trippy-map-every-single-building-netherlands/7127/>

Figures 1 and 2 – Buildings in the Netherlands shaded according to year of construction



(Source – see link below.)

Following the theme of the **circular economy**, the Heritage Council would recommend that the NPF includes the setting up of an annual *National Brownfield Summit* and *Brownfield Development Programme* to support the identification, analysis (including site investigation and remediation/SIR), and redevelopment of brownfield sites, particularly in Ireland's larger settlements. Cases of best practice in Ireland and internationally should be communicated through the NPF 2040 monitoring evaluation process.

This analysis of potential brownfield sites should also take account of the tangible and intangible 'heritage value', whilst creating a new vision for the sustainable reuse of the land, where deemed suitable. We return to issues of brownfield sites and heritage value in Section 4 below.

2.3 Vision - Focus on Choice, Creativity, Quality, Collaboration and Networks

There is a lack of information on innovative heritage management 'networks' in the draft NPF. For example, the Local Authority (LA) Heritage Officer Network is an excellent model of collaboration and partnership and acts as a collaborative 'interface' between the top down and bottom up approaches. The Heritage Council would suggest this LA Network as a Case Study for the final report. The Heritage Council would be pleased to assist with any information or data required.

The government-led approach of the NPF 2040 needs to be complemented with community-based, locally-owned initiatives, such as those proposed in the Historic Towns Initiative, statutorily recognised Community-Led Village Design Statements and the Irish Walled Towns Network. The Heritage Council intends to publish research in early 2018 on the value of such heritage-led regeneration initiatives.

The Heritage Council and Partners also set up and run the all-island Irish Walled Towns Network (IWTN) along with the emerging Town Centre Health Check (TCHC) Network. It is Council's stated intent to develop these initiatives into a Rural Towns Network to spread the benefits to a broader range of historic towns.

The **Irish Walled Towns Network (IWTN)** is an all-island initiative of the Heritage Council established in 2005, which supports communities, as identified by local authority Heritage Officers, to make their historic town better places in which to live, work and visit. The IWTN is fostering a collaborative approach between community and voluntary groups, local authorities and national agencies to realise community-led visions and planning for their historic walled towns. Grant-aid is provided to support towns to realise conservation, interpretation and celebrations of their medieval walled town. An EU Europa Nostra⁸ award-winning training programme empowers the community and voluntary heritage sector to participate in achieving best practice outcomes through planning, activities and development processes.

To achieve the collaborative approach set out in NPF 2040 the IWTN, as an initiative of the Heritage Council will work to empower and support the community and voluntary heritage sector to be able to contribute and share the ground up wisdom that a community has of their own town. Participative processes need care, support and time to unfold in a way that is fair and just for all involved.

Community animators and development workers must be available to support these processes and provide the pastoral care for the process, as well as the people involved. The IWTN can support communities and towns within the network to effectively plan, produce and achieve sustainable heritage development processes which contribute to the economic, social and cultural future for their town.

Other measures needed in the NPF 2040 include the requirement for an integrated society and a design-orientated society, as discussed below.

Need for a more '**integrated society**' – there is evidence that an increased concentration of wealth is owned by a smaller group of people in Ireland, which leads to growing disparity within our society. Research shows that happier societies are also fairer societies – see Denmark, etc. Decades of flight of capital to the countryside have left many of our towns and cities vacant and derelict – this trend needs to be reversed. This integration must be fully reflected in the way we live and must also feed into new national 'models' for quality Place-making thereby creating sustainable and healthy communities and housing for our population - e.g. participative budget-making, participative planning (not the same as consultation), collaborative town centre health checks (TCHCs) involving communities, and new ways of living including co-housing (e.g. students and elderly living together), city co-operatives, etc. A new and adaptable way of inter-generational living should be a core part of the overall vision for the NPF 2040.

⁸ <http://www.europanostra.org/>

Ireland needs to be a Design-orientated society - the NPF 2040 should have at its core an appreciation for quality *design* in all facets of life, particularly in relation to the historic, built and natural environment. Research by the Heritage Council in 2009, which involved senior officers from the Planning Unit of the Department of Housing (formerly the Department of the Environment), highlighted that we in Ireland have a poor understanding of good architectural design in this country, particularly in relation to our rural villages⁹.

The Heritage Council recommends that the National Investment Plan/NIP should support innovative national environmental design programmes and the setting up of new networks and forums/fora that highlight the benefits of raised standards in good design, e.g. better health and quality of life for all.

A *National Urban and Rural Design Forum* is needed to support this behavioural and cultural shift. Various measures should be agreed for the NPF 2040 that are compatible with international measuring scales for quality environments and quality of life. Case studies should be included in any monitoring reports.

Collaborative Society - given the importance of collaboration in a 'relationship-based' society such as Ireland (Source: OECD, 2006), the Heritage Council would strongly recommend the formulation of Section 28 Guidelines for Public Participation and Collaborative Networks, to ensure that all sectoral plans and strategies are linked and integrated and that synergies along with social and human capital are created during the life-time of the NPF 2040.

2.4 Communicating the 'Do Nothing' Scenario

The '**Do Nothing**' scenario needs to be better communicated in the report in terms of setting out the costs of the do nothing scenario (i.e. direct and indirect):- cumulative negative externalities created, e.g. air and water pollution¹⁰, fines from the European Court of Justice (ECJ) in relation to environmental infringements, failure to meet agreed renewable energy targets, etc., along with diminishing returns re. any likely benefits. A strong message detailing the wide-ranging environmental, socio-economic and cultural benefits of the NPF should be communicated clearly and concisely to the Irish public on a regular basis – please see earlier Heritage Council submissions from December 2016 and March 2017 for further detail.

2.5 NPF 2040 High-Level Objectives (page 26) – Climate Change and Heritage

The Heritage Council recommends that the NPF 2040 should contain a fifth High-level Objective in relation to the minimisation of climate change and the importance of Ireland's Adaptation Framework, currently being produced by the Department of Communications, Climate Action and Environment. It is submitted that built environment and transport emissions are matters of spatial planning and as such, the Heritage Council would recommend the inclusion of the following text¹¹:

'Decisions made through the planning system will ensure that Ireland meets its international legal and ethical commitments to reducing the harmful effects of climate change through the reduction of greenhouse gas emissions of at least 80% (from 1990 levels) by 2050 across the electricity generation, built environment and transport sectors.'

⁹ Heritage Council External Evaluation of Village Design Statement Programme 2000-2008 – this VDS programme was redesigned in 2009 to make it a collaborative initiative CL-VDS – Community-led LVDS Toolkit (2012) - http://www.heritagecouncil.ie/content/files/community_led_village_design_statements_toolkit_2012.pdf.

¹⁰ See <https://static.rasset.ie/documents/news/2017/11/epa-air-quality-programme-2017-22.pdf>

¹¹

http://www.epa.ie/pubs/reports/air/airemissions/ghgprojections/EPA_2017_GHG_Emission_Projections_Summary_Report.pdf

2.6 Support for Atlantic Economic Corridor (AEC)

Support for an Atlantic Economic Corridor (AEC) is to be welcomed and it would be beneficial if various options for enhanced connectivity were presented in the NPF, particularly between the North West and Northern Ireland. To achieve this, new governance structures are needed to ensure collaboration and co-operation along the western seaboard. The Heritage Council is currently exploring the feasibility of setting up an AEC Network for Local Authority Heritage Officers to examine shared issues and forces for change including climate change and we would welcome support for innovative structures during the plan period and through the National Investment Plan (NIP).

A key development in the branding of activity in this area in recent years has been the Wild Atlantic Way yet content or policy on the role of tourism in the draft NPF 2040 is rather light. The Heritage Council notes that National Policy Objective 21 relates solely to the rural economy yet the impact of tourism is far broader than this.

The impact of unsustainable forms of tourism is a growing issue internationally and indeed this is also becoming apparent in some parts of the Atlantic Economic Corridor. As such, the Heritage Council would suggest a greater commitment to the promotion of sustainable tourism models and the monitoring of change in this area is critical. We return to the issue of the Atlantic Economic Corridor (AEC) in Section 8 below.

3. NPF 2040 - CHAPTER 8 REALISING OUR SUSTAINABLE FUTURE

This chapter focuses on Chapter 8 of the draft NPF 2040 and is set out under the following headings:

1. Chapter 8 of the NPF 2040 should come earlier in the document;
2. Climate Change, Greenhouse Gases, and Adaptation;
3. European Landscape Convention and Ireland's National Landscape Strategy 2015-2025;
4. Ireland's world-renowned Seascapes;
5. UNESCO World Heritage Sites (WHs) and National Monuments;
6. Buildings and Building Energy;
7. Government Policy on Architecture (GPA) and National Inventory of Architectural Heritage;
8. Heritage Council Landscape Proposals (2010) and need for Landscape Observatory of Ireland (LOI); and
9. Emerging SEA and Landscape Indicators Study – Heritage Council and EPA.

3.1 Chapter 8 of the NPF 2040 should come earlier in the document

The Heritage Council strongly recommends that Chapter 8 of the draft NPF 2040 should move to become a new Chapter 3 in the document. If Ireland's significant environmental challenges are presented earlier in the report, it is easier and more straightforward to raise public awareness and understanding of the proposed strategic responses coming from a national level. This also links back to an earlier recommendation from the Heritage Council in relation to the need for effective and clear communication of the implications of the 'Do Nothing' scenario.

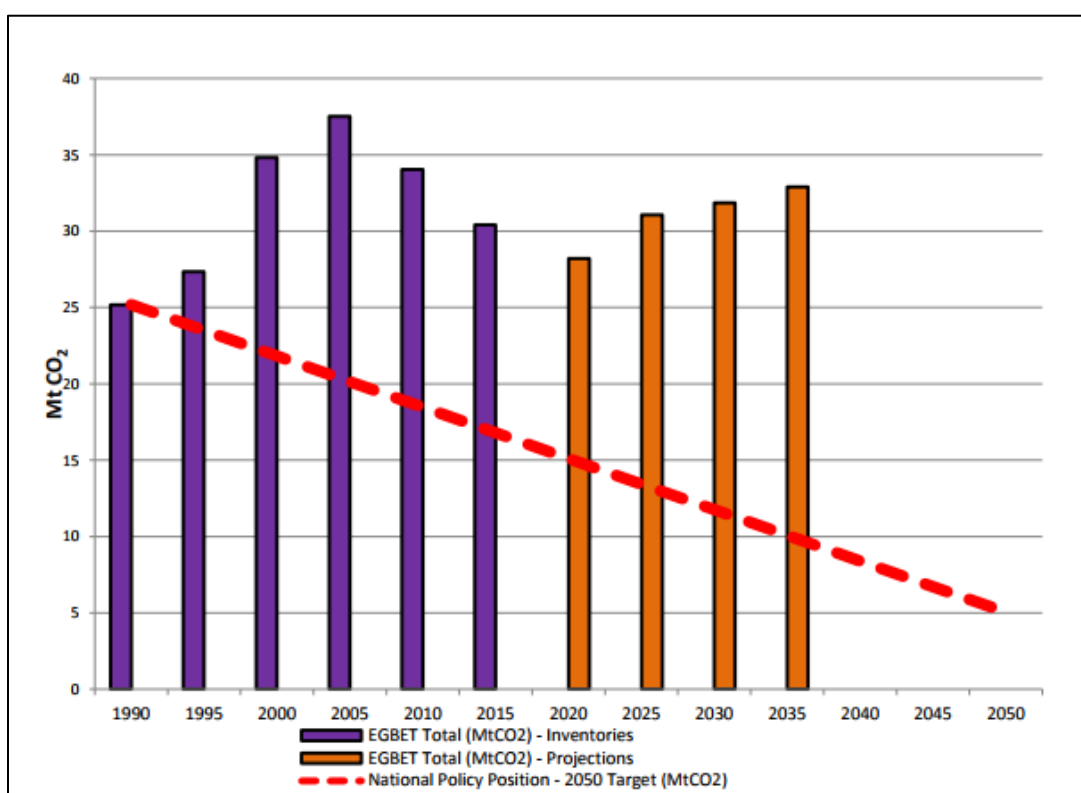
For example, the important topic of landscape, i.e. ALL landscapes, is lost in the chapter and is linked solely with natural heritage contrary to more all-encompassing modern practice of including urban and rural, along with peri-urban, etc. Ireland has ratified the European Landscape Convention and the emphasis on ALL landscapes is paramount if we are to meet our obligations in this regard. In general, recognition of the important role of Ireland's national heritage is missing from this chapter, which has impacted on other draft chapters of the NPF 2040.

3.2 Climate Change, Greenhouse Gases, and Adaptation

Elements of the chapter that deal with greenhouse emissions and mitigation and adaptation to climate change should be given priority in national planning policy. The Heritage Council recommends that the NPF 2040 should be fully in accordance with targets and priorities for land use planning and transportation in the forthcoming *National Adaptation Framework* currently being formulated by the Department of Communications, Climate Action and Environment.

Environmental Protection Agency (EPA) figures released in April 2017¹², illustrated in *Figure 3* below, indicate the scale of Ireland's challenge in meeting international targets in relation to reductions in greenhouse gas emissions. These have a crucial bearing on the well-being of human society in Ireland and on the welfare and environmental quality and ecosystem on which Irish and global society depends.

Figure 3: Historic and Projected CO₂ emissions from the electricity generation, built environment and transport sectors



3.3 European Landscape Convention and Ireland's National Landscape Strategy 2015-2025¹³

There is no reference to the European Landscape Convention (ELC) in this section, which is driving the international agenda for the planning and management of ALL landscapes within signatory countries. The section also needs to link more strongly to the *National Landscape Strategy 2015-2025* and should include a definition of landscape that includes urban and peri-urban – as noted in our previous submissions - landscape is not just rural/countryside.

¹² Source EPA, 2017, *Ireland's Greenhouse Gas Emission Projections 2016-2035*.

¹³ <https://www.chg.gov.ie/app/uploads/2015/07/N-Landscape-Strategy-english-Web.pdf>

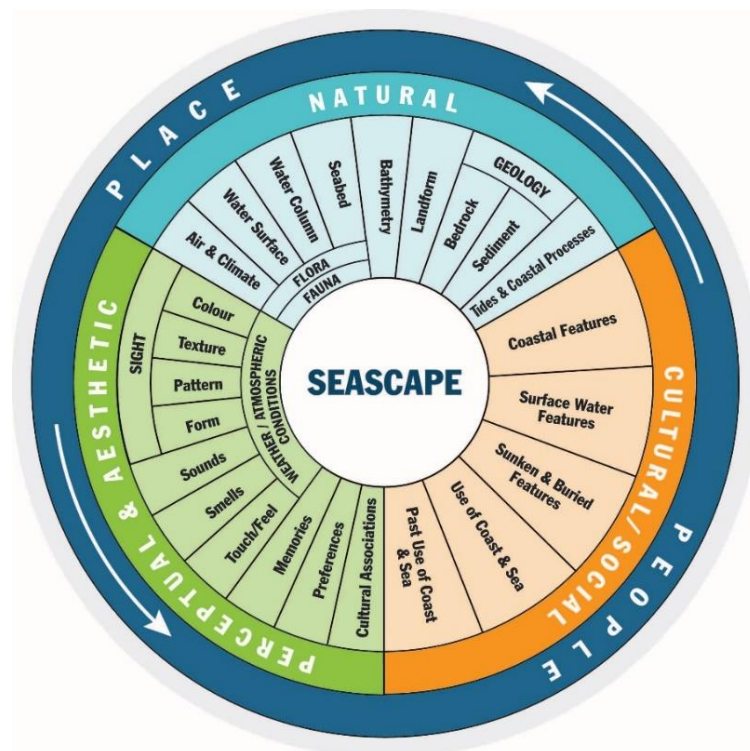
The concept and role of landscapes as a *public good* also needs to be acknowledged and supported, i.e. the concept that land is a private good and landscape is an [impure] public good¹⁴. The Heritage Council supports the implementation of the National Landscape Strategy and urges greater recognition of the strategy in the NPF 2040. The Heritage Council notes the reference to the acknowledgement of the need for a consistent approach to Landscape Character Assessment (LCA on page 118). This is currently being developed under the direction of the Department of Culture, Heritage and the Gaeltacht, i.e. is at a tender development stage, by a National Landscape Strategy Working Group.

Accordingly, it is submitted that new Section 28 Landscape Assessment Guidelines will be needed as the Section 28 Guidelines (2000) are still in draft form over 17 years later¹⁵. The Heritage Council recommends that this chapter includes a National Policy Objective to support the formulation of a National Landscape Character Assessment/NLCA, as per the NLS 2015-2025. Council sees the development and use of such a resource as fundamental to the planning and management of landscape change in Ireland.

3.4 Ireland's world-renowned Seascapes

Ireland's world-renowned Seascapes, e.g. the Wild Atlantic Way, should also be considered in this section – the landscape wheel (page 119) is to be welcomed and the inclusion of the seascape wheel would greatly enhance the NPF 2040, particularly in light of the requirement for Ireland's first *National Maritime Spatial Plan (NMSP)*, which is due by 2021. Natural England's seascape wheel, which is based on the landscape wheel designed by Professor Carys Swanwick for The Countryside Agency in 2002¹⁶ (now Natural England), is reproduced as *Figure 4* below.

Figure 4: Seascape Wheel



¹⁴ See Multifunctional Rural Land Management: Economics and Policies, Edited by Floor Brouwer and C. Martijn van der Heide, 2009.

¹⁵ <http://www.housing.gov.ie/search/archived/current/category/planning/type/publications?query=landscape>

¹⁶ <http://www.snh.org.uk/pdfs/publications/LCA/LCA.pdf>

3.5 UNESCO World Heritage Sites (WHSs) and National Monuments

Ireland's UNESCO World Heritage Sites (WHSs) and Tentative List World Heritage Sites, represent landscape areas of sufficient significance to be recommended for international recognition. As such, they deserve greater attention in the NPF 2040. World Heritage Sites can potentially be key drivers for socio-economic and cultural growth in their regions and, as such, could have a far stronger role in proposed regional development. It is noteworthy that many of our internationally-significant historic landscapes are dispersed in upland or in less developed areas of the country. A sustained programme of consultation, capacity-building and a commitment to sustainable management is required in advance of designating such complexes.

On a more general note, the role of 'heritage' in creating the historic form and fabric of our cities, towns and villages is not acknowledged in the draft document. A sense of 'Time-depth' for the wider living landscape is needed in the NPF 2040. This will be further developed below in Section 4 on managing stronger urban places.

In relation to the historic environment, it is important to highlight that there is a consolidated *National Monuments Bill* in an advanced state of preparation. This emerging legislation updates and modernises the framework for the protection of our archaeological heritage some of which currently dates from 1930. The Heritage Council is of the opinion that the range of capital projects envisaged in the NPF 2040 and the potential changes to our historic landscapes over the lifetime of the plan, requires this legislative change to be progressed as a matter of urgency so as to manage any risk. This was a recommendation of the Royal Irish Academy's *Archaeology 2025* publication.¹⁷ At present, a National Heritage Plan is also in preparation by the Department of Culture, Heritage and the Gaeltacht.

As such, a national policy objective more specific than NPO 59 (page 119) for the sustainable management of the historic environment is urgently required.

3.6 Buildings and Building Energy

The reduction of energy usage in buildings is a key element of the Climate Change Mitigation and Adaptation Strategy. Reduction of the energy use in buildings will be a target of policy and actions of the Department of Communications, Climate Action and the Environment. Such a policy can be supported in the planning system by (a) reviewing whether Planning Regulations facilitate or prevent energy retrofitting of existing buildings, and (b) registering and monitoring the real aggregate output of heat from buildings in urban agglomeration. This will lead to the tailoring of planning and energy reduction policies. It is recommended that a national policy objective should be included to create and monitor this issue through the use of heat maps for large cities in Ireland.

For illustrative purposes, an example of the heat map for London is provided overleaf as *Figure 5*. The NPF 2040 should consider the following questions:

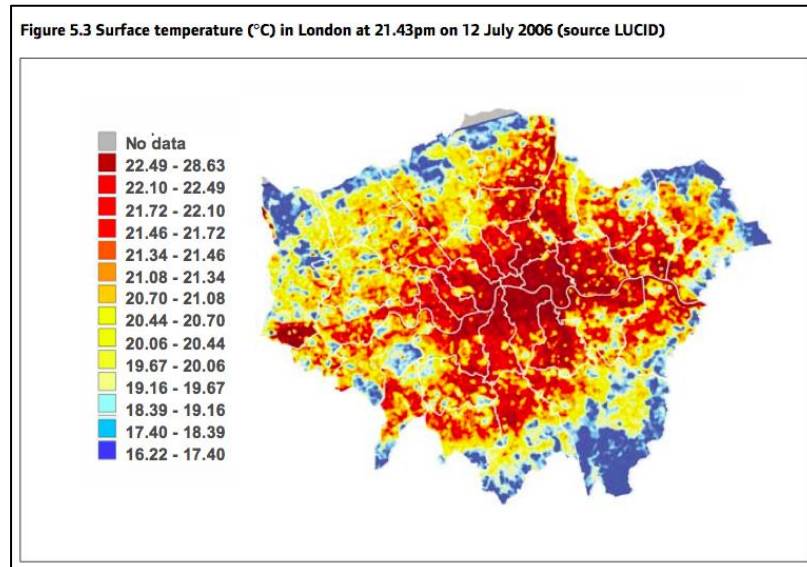
- Which urban settlement structures tend to be stressful to the bioclimate?
- How can spatial strategies and development plans be optimised with respect to human health?
- Which arguments for development regulations can be derived?
- Which areas are appropriate for new developments?
- Where is action urgently needed?

When development is deemed to require planning permission it becomes a matter for building control legislation. Regulatory procedures can often dissuade building owners from making improvements thereby preventing their reuse.

¹⁷ www.ria.ie/archaeology2025

Whilst there is a quality control justification for this, the Heritage Council calls for a review of the Planning Regulations to streamline processes and permit proportionate and well-guided interventions to historic building stock.

Figure 5: Heat Stress Map of London (2006)



3.7 Government Policy on Architecture (GPA) and National Inventory of Architectural Heritage

The Government Policy on Architecture 2009-2015 has only partially been implemented as a result of straitened public finances during the relevant policy period. The GPA's uncompleted Actions remain valid public policy objectives and ought to be implemented. The NPF 2040 should cross-reference this policy, which has had beneficial impacts on the planning system through its support for:

- Architectural quality;
- Education in relation to the value of the built environment and good building design;
- The importance of place-making; and
- Making best use of built environment resources.

The NPF 2040 should also refer to the work of the National Inventory of Architectural Heritage. This is the basis for providing Ministerial Recommendations for the inclusion of structures in the Record of Protected Structures, a statutory function of planning authorities. The surveying work of the NIAH can be extended to include recommendations for areas whose character ought to be protected through the Architectural Conservation Area statutory designations.

3.8 Heritage Council Landscape Proposals (2010) and need for Landscape Observatory of Ireland

It is unclear how 'change' in our landscape (i.e. ALL landscapes as per the ELC definition) will be monitored without a robust base-line, i.e. NLCA, or without competent monitoring structures and processes, i.e. Section 28 Guidelines on landscape assessment are still in draft format 17 years later. The Heritage Council submits that, given the scale of landscape changes envisaged within the lifetime of the NPF 2040, a comprehensive monitoring framework for landscape and cultural heritage needs to be devised and implemented. For an exemplar of landscape assessment and monitoring, please see the Landscape Observatory of Catalonia, Spain.

The Heritage Council's Proposals for Ireland's Landscapes published in 2010 included a proposal to establish a Landscape Observatory for Ireland. Due to a lack of funding, the proposal was not realised. The proposed Landscape Observatory of Ireland is summarised in the box below.

The capacity of the Landscape Observatory of Ireland (LOI) would be greatly enhanced by the National Biodiversity Data Centre and the Discovery Programme, two existing satellites of the Heritage Council as well as its recent Heritage Maps Initiative¹⁸. Similarly, the Observatory would draw on expertise available to it through the Heritage Council's Museum Standards Programme and the Local Authority Heritage Officer Programme. The National Inventory of Architectural Heritage, which deals with both architecture and designed landscapes (NIAH), as well as the Archaeological Survey of Ireland (ASI), would also be essential in allowing the Observatory to realise its potential - a key partnership should be developed with the Ordnance Survey. The integration of this data within the Observatory and its synthesis would allow its application in the monitoring and tracking of change in the landscape and its character.

Pursuant to its responsibilities under the Heritage Act 1995, the Heritage Council proposes that it be invited to establish the Landscape Observatory of Ireland and would welcome such an invitation from the Minister. This approach would avoid any perception in that additional agencies were being established, as it would be an extension of the Heritage Council's role in line with emerging best practice and European approaches to our landscapes, as well as being of direct and meaningful relevance to the public at large. Council would also bring to bear the experience it has gained in developing and delivering multi-disciplinary, award-winning Landscape Character Assessment Training Courses¹⁹ (including Historic Landscape Characterisation/HLC) and habitat mapping in establishing such an initiative, as well as in directing cost-effective and efficient operations, such as the National Biodiversity Data Centre and the Discovery Programme. Should Council be asked to assume this function on behalf of the Minister, the Observatory would be located within the existing Heritage Council headquarters in Kilkenny, thus minimising any additional costs associated with its establishment.

Given the degree of change projected in the NPF 2040, the monitoring of changes to cultural heritage will be a pressing area. At present, our 'systems' are not measuring changes in historic environment in any meaningful way, e.g. trends in Protected Structures, Architectural Conservation Areas (ACAs), Recorded Monuments, developmental impacts or mitigation measures required through EIARs, etc. A review of how this is measured and monitored and viewed in terms of Strategic Environmental Assessment (SEA) is also required.

3.9 Emerging SEA and Landscape Indicators Study – Heritage Council and EPA

The Heritage Council is collaborating with the EPA SEA Unit on a study to identify landscape indicators within an Irish context. The need for this study arose directly out of attendance at an East Midlands Regional Assembly's Regional Spatial and Economic Strategy (RSES) Stakeholder Workshop in Dublin in July 2017. It is anticipated that the findings and recommendations from this study will inform the monitoring and evaluation of the NPF 2040 and the emerging Regional Spatial and Economic Strategies, particularly in relation to SEA, Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA).

¹⁸ <https://www.heritagemaps.ie/>

¹⁹ The Heritage Council and Partners' LCA CPD Training Course was conferred with the Irish Landscape Institute President's Award in November 2009.

4. MAKING STRONGER URBAN PLACES – CITIES, TOWNS, ETC.

This section discusses the role of the Heritage Council and the relevance of its programmes/initiatives to the NPF 2040, under the following headings:

1. Why Places Matter;
2. Ireland's Five Cities and Suburbs (34% of Ireland's Population);
3. Building Stock Monitoring and Analysis Programme for Ireland's Cities;
4. Encourage use of Architectural Conservation Area (ACA) Designations; and
5. Regeneration - Brownfield Sites and Existing Buildings.

4.1 Why Places Matter

Decades of private capital flight to the countryside have left many of our towns and cities vacant and derelict – this trend needs to be reversed. Reintegration must be fully reflected in the way we live and must also feed into new 'national models' for quality Place-making, creating sustainable and healthy communities and housing our existing and projected population. In line with its statutory remit, the Heritage Council launched its *Policy Proposals for Ireland's Towns*²⁰ in November 2015. A copy of the proposals document is enclosed with this submission. The Heritage Council supports the statement in Section 3.2 (page 43) of the draft NPF that:

'All or part of our cities and towns may be viewed as underutilised assets, with significant potential for intensification and regeneration. This requires consideration of different roles and new functions, but also changed physical formats and enhanced levels of amenity and design....'

NPF 2040 National Policy Objectives 6 and 7 (plus 15, 16, 17 and 37 in other chapters) for Cities, Towns and Villages are hugely relevant to numerous new and established Heritage Council Programmes that support the proposed national policies of regeneration and renewal, including:

- Collaborative 'Pilot' Town Centre Health Check (TCHC) Training Programme (4 no. pillars including local authorities and local Chambers of Commerce) – 15 Step TCHC Methodology;
- Collaborative Public Realm Plan (PRP) Programme;
- Community-led Village Design Statement (VDS) Programme and Community-led VDS Toolkit²¹;
- Irish Walled Towns Network (IWTN);
- Museums Standards Programme of Ireland (MSPI); and
- Heritage Council's Annual Community Grant Programmes – refurbishment, conservation and management plans, etc.

The Heritage Council would welcome discussions to explore how the proposed *National Smart Growth Initiative* could assist the widening and deepening of these successful collaborative Place-making programmes to support the implementation of the NPF 2040. For example, an overview of the design and delivery of the collaborative TCHC Health Check Training Programme is provided at *Appendix A*.

4.2 Ireland's Five Cities and Suburbs (34% of Ireland's Population)

The key cities identified in Section 3.9 (Dublin, Waterford, Cork, Limerick and Galway) are all historic cities. With the exception of Galway, all originated as Viking settlements. Moreover, all five cities developed as medieval, walled cities with layers of history and culture i.e. these settlements have a rich sense of **Time-depth**. This critical issue is hugely relevant to spatial planning as it helps provide character, sense of place and local identity, yet it has been ignored by the NPF 2040.

²⁰ http://www.heritagecouncil.ie/content/files/policy_proposals_irelands_towns_2015_5mb.pdf

²¹ See earlier reference.

For example, the section on Cork City fails to acknowledge its rich urban history with deeply stratified archaeological deposits and an impressive built heritage resource. Similarly, the section on Limerick needs a stronger acknowledgement of its Viking and Medieval heritage which has added a distinct character, particularly in the King's Island/Nicholas Street area.

While the NPF 2040 clearly acknowledges the important Georgian core of Limerick, the document fails to recognise the important medieval character of the city. The Heritage Council's Irish Walled Towns Network (IWTN) has done much to press for a greater acknowledgement of this medieval identity in our historic urban centres.

For Galway, the September 2016 Galway Transport Strategy needs to be fully integrated with the Development Plan's land use policies if its seemingly intractable traffic problems are to be overcome. The particular geographical constraints of the city's location in relation to Lough Corrib and Galway Bay, both of which are environmental and recreational resources, demand special planning attention. Galway's unique cultural and heritage qualities need to be managed and curated. It is notable that though the city has a Living City Special Regeneration Area, it does not have a local authority Architectural Conservation Officer.

The role of culture as a driver of urban development and as a force for renewal is absent from the NPF 2040. Cities such as Waterford, taking inspiration from the unique character of their heritage, have invested heavily in cultural Place-making with the support of the Heritage Council and others, e.g. in Waterford the idea of a 'Viking Triangle' area has been used as a brand for heritage-led/culturally-focused regeneration. This is part of a wider international trend of rejuvenating inner-urban cores through cultural infrastructure e.g. Antwerp and Bilbao. Reference to the ongoing Creative Ireland Programme provides an over-arching policy context for this in Ireland. A greater recognition of the role of culture as a positive force, in particular for urban regeneration and Place-making, should be included in relevant sections of the NPF 2040.

It is submitted that more detail is required in the NPF 2040 in relation to the settlement hierarchy for towns within the category of below the five cities and greater than 10,000 population.

4.3 Building Stock Monitoring and Analysis Programme for Ireland's Cities

As noted above in Section 2.2 of this submission, the Heritage Council would recommend that a building stock analysis is prepared for these important historic settlements – see case study from the Netherlands above – along with a city-wide landscape character assessment/LCA, as per the requirements of the European Landscape Convention (ELC) and National Landscape Strategy 2015-2025.

This is particularly important given the absence of an up to date National Heritage Plan (NHP) and a National Landscape Character Assessment (NLCA) in Ireland. As noted above, a national building stock programme should be implemented as part of the 10-year National Investment Plan (NIP) and managed by the proposed National Land [and Buildings] Development Agency.

4.4 Encourage use of Architectural Conservation Area (ACA) Designations

Architectural Conservation Area (ACA) designation, a provision available to planning authorities to protect the architectural heritage, is under-used and often misunderstood. This planning tool sets out to protect the character of an area, and relates to the exterior of buildings and not their interiors. ACA designation aims to protect streetscapes and collections of buildings which form functional or aesthetic groups, without unduly imposing on the functional use of buildings' interior spaces.

More generally, the challenge of identifying the ‘character’ of an area or place, which can include its social and economic life, will be useful in planning for the revitalisation of towns and can form part of good practice in forward planning/‘FP’.

The Heritage Council is currently carrying out research with Cork City and County Council, due to be completed in March 2018, on the potential of ACAs to stimulate and facilitate ‘Heritage-led’ urban regeneration.

This ACA study will focus on formulating robust methodologies for the identification of opportunities for the enhancement of the character of an area – for example – the reuse of vacant residential properties, the in-filling of vacant [brownfield] sites, and what simple principles might ensure that such action does not detract from the character of their surroundings, and potentially drive place-making and regeneration.

A review and examination of the use of ACAs as a framework for incentivising urban renewal will help to inform urban renewal programmes including the potential widening and deepening of the Living City Initiative, in order to apply more generally to Towns.

Such an approach will unlock the potential of towns to displace environmentally-costly new builds, make use of existing public infrastructure and services, cluster and exploit health and social services, and make our towns more attractive as historic environments for citizens, visitors and investors.

4.5 Regeneration - Brownfield Sites and Existing Buildings

Greater consideration of what brownfield means is required in the NPF 2040 as well as a recognition that such brownfield complexes often have meanings as heritage sites. Moreover, many contain historic buildings. Such locations frequently possess archaeological or industrial-archaeology values, e.g. former breweries, mart sites, places of former institutional use, which should not always be seen automatically as a constraint to development but rather as providing a sense of distinctiveness, character and place, if correctly assessed and managed.

Historic urban centres are attractive places for development. They are also typically high in archaeological material. Often the potential archaeological remains contained in brownfield sites are perceived as a threat to possible development. Certainly, excavation can be expensive. Nonetheless, the risk can be properly managed by obtaining appropriate professional advice and taking a flexible approach. The County Dublin Archaeology Data Viewer gives a GIS map-based overview on all the excavations which have previously taken place and access to the associated reports²².

The key benefit of the Archaeology Viewer is that it allows the swift creation of an archaeological assessment, giving developers and the design/planning team information as to likely deposits on the proposal site. This provides the opportunity to at least attempt to design around archaeological remains or indeed to figure out ways of incorporating them into the development as a place-making exercise, thereby adding socio-economic and cultural value in the local area. Guidance on the development of archaeologically sensitive sites is set out in the Heritage Council document (2000), *Archaeology and Development: Guidelines for Good Practice for Developers*²³. The Heritage Council recommends that the Dublin GIS Archaeology Viewer should be expanded nationwide.

²² <https://www.heritagemaps.ie/WebApps/DublinArchaeologyProject/index.html>

²³

http://www.heritagecouncil.ie/content/files/archaeology_development_guidelines_good_practices_for_developers_2000_1mb.pdf

Regeneration is a recurring theme throughout the draft NPF 2040 – brownfield targets for different scales of settlement are stated in Section 3.8 of the NPF 2040 but more is needed to support the reuse of such sites and existing buildings in the short term. Many historic cores of settlements with land uses/retail and residential vacancy levels over 20%, as demonstrated by the national ‘Pilot’ TCHC Training Programme 2016/2017, should be prioritised in national policy. In addition, it is submitted that brownfield/infill targets should be higher for Dublin – it is submitted that the NPF 2040 should aim for 60% in Dublin.

A robust evidence-based approach should seek to target/incentivise settlements that have created reliable baselines which are monitored on an annual basis – please see *Denny Street and Buildings Revitalisation Project*, which arose out of the key findings of the ‘Pilot’ Tralee Town Centre Health Check Report 2017 - launched by Minister English T.D. in August 2017.

Photograph 1: Launch of Tralee Town Centre Health Check (TCHC) Summary Report 2017 by Minister of State Damien English T.D. in August 2017



(L to R: Miriam Fitzpatrick (Heritage Council Board Member), Ali Harvey (Heritage Council), Mayor of Tralee Norma Foley, Minister of State Damien English T.D., Cllr John Sheahan (Mayor of Kerry) and Michael Parsons (Chair of the Heritage Council), August 2017.)

The proposed land [and buildings] agency - National Land Development Agency - should include empty buildings, particularly those owned by the State, state agencies, e.g. CIE, and local authorities. The introduction of legislation in relation to CPO powers for community groups should also be explored, as per Scotland’s provisions under the *Community Empowerment (Scotland) Act 2015*²⁴.

²⁴ <http://www.legislation.gov.uk/asp/2015/6/contents/enacted>

5. PLANNING FOR DIVERSE RURAL PLACES

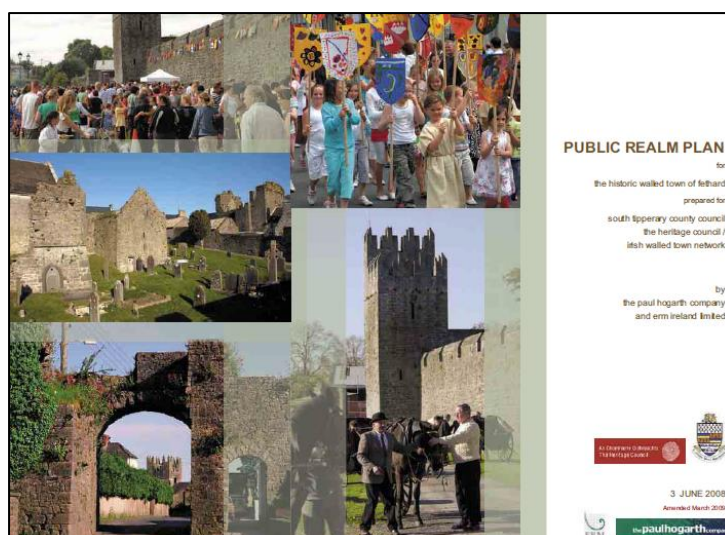
This section provides background information on Heritage Council programmes and initiatives that assist in the future planning for diverse rural places including collaborative public realm plans and Community-led Toolkits. Recommendations are also provided in relation to rural housing and farm buildings, renewable energy e.g. onshore wind farm sector, and management of peatlands.

5.1 Heritage Council Programmes to assist Planning for Diverse Rural Places

The Heritage Council manages a number of collaborative national programmes that assist and support the enhancement and regeneration of small towns and villages along with the restoration of damaged and degraded landscapes, e.g. Traditional Farm Buildings Scheme²⁵. These rural programmes, projects and associated data sets, constitute a valuable combined corporate and community knowledge, from which to progress the future planning for diverse rural places.

In relation to place-making and regeneration of rural towns, the Heritage Council has set up and developed several collaborative and award-winning public realm plans for rural towns in partnership with local authorities, local communities and chambers of commerce including: Balbriggan, Birr, Cashel, Fethard²⁶, Roscrea and Wicklow.

Figure 6: Fethard Public Realm Plan



Fethard Public Realm Plan was linked to a Heritage Council-led Feasibility Study²⁷ to explore potential uses for the former derelict Tholsel and which was brought back into use as a tourism centre in 2017 - *Fethard Horse Country Experience*²⁸ - through various sources of funding.

The Heritage Council has developed various Toolkits that could be rolled out under rural place-making programmes including the award-winning *Community-led Village Design Statement Toolkit*²⁹.

²⁵ This programme is run in partnership with the Department of Agriculture, Food and the Marine.

²⁶ http://fethard.com/reports/Public_Realm_Plan.pdf

²⁷ A Heritage Council-led Feasibility Study for the derelict Youghal Clock Gate Tower was also undertaken at the same time. Following conservation and restoration works, this iconic historic structure is now a tourist attraction.

²⁸ <http://fhcexperience.ie/>

²⁹ <http://www.heritagecouncil.ie/projects/community-led-village-design-statements>

Another example is *Solving our Own Problems*, which is a participative event devised by the Irish Walled Towns Network (IWTN) to support member towns in a democratic process of asking in-depth questions, finding out what is important to the local community and creating realistic actions to problem solve in their town. A group of expert mentors facilitate special interest groups in a two-day workshop, with the outcomes and actions realised into a printed plan for the town to reference and to guide local decision-making.

5.2 Rural Housing and Modern Farm Buildings

The proposed policy on rural housing (Section 4.5, page 68) requires more detail and should reference international best practice, for example, Sweden has an effective rural housing model which focuses on clustering and scale. More detail is required on assessing the receiving environment and ‘capacity’ of the landscape to absorb the proposed development, given the absence of national or regional landscape character assessments and robust S28 Guidelines for landscape assessment and cumulative visual impact assessment (CVIA).

The Heritage Council recommends that the Section 28 Rural Housing Guidelines, 2005, should be updated to reflect the key tenets of the National Landscape Strategy 2015-2025 and the judgement of the Flemish Decree/ECJ Case³⁰. As noted above, it is recommended that a design-orientated society would reflect a growing awareness of the need for well-designed and situated houses in the open countryside.

It is recommended that the NPF 2040 should highlight principles of good design along with a case study of best practice local authority rural design guidance in parallel with support for the National Landscape Strategy 2015-2025. Best practice rural design guidance and associated building projects, including farm buildings, should also be highlighted in the NPF 2040 monitoring reports. The Heritage Council is of the view that provisions for the exempted development of large-scale modern agricultural buildings need to accord greater consideration to location and visual impact.

5.3 Renewable Energy e.g. the Onshore Wind Farm Sector

The Heritage Council submits that its policy research report entitled *The Onshore Wind Farm Sector in Ireland: Planning in Harmony with Heritage*, 2013³¹ is relevant to national policy on renewable energy. It should be noted that, due to a lack of resources, the Heritage Council was unable to prepare a similar report on the off-shore wind farm sector in Ireland.

The Heritage Council’s 2013 policy research report included the following recommendations, which are pertinent to the emerging NPF 2040:

1. *Any Section 28 (as amended) Guidelines which are relevant to onshore wind energy development should contain a detailed definition of Ireland’s historic environment - both statutory and non-statutory - along with a description of the numerous multi-layered and inter-dependent heritage assets that make up the historic environment;*
2. *National guidance on the assessment of the impact (direct, indirect, cumulative) of onshore wind farms and their associated elements on our national heritage is required, in order to inform the plan-making and planning application determination processes;*

³⁰ <https://www.oireachtas.ie/parliament/media/housesoftheoireachtas/libraryresearch/lrsnotes/EU-Law-and-Local-Residency.pdf>

³¹ The Onshore Wind Farm Sector in Ireland, Vols. 1 and 2, A. Harvey and K. Moloney, 2013, http://oldsitehc.info/fileadmin/user_upload/Planning/2013/windfarm_Overview.pdf

3. *Robust Section 28 Guidelines are required in relation to Landscape Character Assessment including Historic Landscape Characterisation (HLC), Habitat Mapping, effective Public Participation Methods/Tools and Geographical Information Systems. The Guidelines should be informed by the Heritage Council and Partners' multi-disciplinary LCA CPD Training Course; and*
4. *Legislation and policy is required to ensure that there is a clear planning or community gain associated with the development of the onshore wind farm sector in Ireland, e.g. Energy Trusts. Public policy in relation to a desired social dividend should also be prepared in parallel with socio-economic, environmental and cultural policy, in accordance with the European Landscape Convention (ELC) and the UNECE Aarhus Convention.*

Section 28 Guidelines are also required for solar energy, as part of the delivery of the NPF 2040.

5.4 Ireland's Peatlands

The Heritage Council welcomes the provisions on Ireland's peatlands but would query whether there is a policy conflict between two separate sections of the draft NPF 2040. The section on Energy Production (page 71) refers to the significant amount of peatlands in the ownership of semi-state bodies and raises the need for a long-term national strategic land use plan for peatlands in state ownership. Chapter 8 briefly notes the need to enhance and protect carbon pools such as peatlands.

The unique character of Irish peatlands has been established in numerous scientific reports and the range of ecosystem services they supply is impressive. Moreover, they are also important repositories of archaeological structures, objects and palaeo-environmental remains.

Any long-term land use plan for such peatlands needs to recognise their cultural and environmental value and also address the threat posed to peatlands in private ownership, which fall outside the formal planning system.

6. PEOPLE, HOMES AND COMMUNITIES

This section provides information on a sample of the Heritage Council's best practice models of collaboration and community-led development initiatives which, if given increased capacity and resources, could play a greater role in the delivery of the national policy objectives set out in the NPF 2040. The section also includes recommendations on health impact assessment/HIA, assessing vacancy levels and the proposed Housing Need Demand Assessment (HNDA) methodology.

6.1 Heritage Council – Collaboration and Community-led Initiatives

The Local Authority (LA) Heritage Officer Network is an excellent model of collaboration and partnership and acts as an 'interface' between the top down and bottom up approaches to community development in Ireland. The Heritage Council would suggest that this LA Network be included as a Case Study for the final report, particularly in relation to enabling capacity building and fostering community leadership.

As noted above, the Heritage Council has developed various Toolkits that can assist community development and place-making in both urban and rural areas. For example, the collaborative and participative approach that is set out in the *Community-led Village Design Statement Toolkit* was piloted with Dublin City Council, Meath County Council, and relevant residents/community groups in two villages – one 'urban' (Sandymount) and one 'rural' (Julianstown).

More recently the 'Pilot' Town Centre Health Check (TCHC) Training Programme (4 no. pillars) has involved the Heritage Council and local authorities working in partnership with local chambers, civic groups and third-level institutes and organisations and their students using a 15-Step TCHC methodology developed by the Heritage Council in late 2016 with key partners and implemented in 2017. The Heritage Council would welcome discussions to explore how these Networks, Toolkits and Pilot Programmes can assist in the delivery of the NPF 2040's vision and national policy objectives.

6.2 Health Impact Assessment (HIA)

According to the World Health Organisation (WHO)³²:

'Health Impact Assessment (HIA) is a means of assessing the health impacts of policies, plans and projects in diverse economic sectors using quantitative, qualitative and participatory techniques. HIA helps decision-makers make choices about alternatives and improvements to prevent disease/injury and to actively promote health.'

It is submitted that a national policy objective should be included in relation to promoting a health impact assessment (HIA) in the delivery of the NPF 2040, particularly through the planned National Investment Plan. In addition, the Heritage Council would also welcome a national policy objective that supports **Gender Proofing** of all programmes and projects that are assisted under the national investment plan.

6.3 Assessing Vacancy Levels

National Policy Objectives 35, 36 and 37 re. Housing and their associated paragraphs, require more detail. For example, the draft NPF 2040 states on page 87 that just over 9% of the total national housing stock is vacant. However, as the Pilot Town Centre Health Checks (TCHCs) 2016/2017 and Heritage Council research on residential vacancy have shown, the picture locally is much more negative with vacancy rates greater than 25% in many historic town cores.

More detail is required in relation to how these buildings and properties can be brought back into use, In addition, the NPF 2040 needs to clearly address and target vacant commercial premises, particularly on the upper floors of buildings in our historic town and city centres.

6.4 Housing Need Demand Assessment (HNDA) Methodology

The Heritage Council notes the articulation of a 3-step Housing Need Demand Assessment (page 89). Step 2 includes an assessment of '...ineffective stock and overall condition as well as priorities for future stock management...'. The Heritage Council submits that there also needs to be a heritage input to such an assessment, i.e. location within an Architectural Conservation area/ACA or listing on the Record of Protected Structures or Record of Monument and Places. Such a status may require modified management strategies for some components of the housing stock.

As noted above, the Heritage Council welcomes the inclusion of the case study on McAuley Place in Naas, Co. Kildare, in the former Convent of Mercy building. This is an important case study in that it identifies a successful re-use of a former institutional building to suit the residential needs of the older community and the wider community. The building's location in the centre of the town and its reuse and adaptation is underplayed by the case study. The majority of Irish towns retain former institutional buildings mainly dating from the 19th century, which have fallen into vacancy and dereliction.

McAuley Place in Naas is important in that it offers an exemplar project demonstrating how such complexes can be sustainable – as a tangible element of the circular economy – i.e. for our older citizens, for communities and for the regeneration of our historic urban cores.

³² <http://www.who.int/hia/en/>

7. REALISING OUR ISLAND AND MARINE POTENTIAL + INLAND WATERWAYS

This section has three key themes – the need for robust Seascape Character Assessment (SCA) in Ireland, Ireland’s unique marine cultural heritage and the value of Ireland’s inland waterways network.

7.1 Need for robust Seascape Character Assessment (SCA) in Ireland

The Heritage Council welcomes this chapter and would recommend further detail on potential international and national programmes to support this developing sector. In relation to National Policy Objectives 40-43 - given the ongoing lack of a robust **seascape character assessment (SCA)** system in Ireland, it is recommended that the National Investment Plan/NIP should include a new national programme for SCA at all levels of spatial planning to support the policy objectives set out in this chapter. This SCA programme would inform reviews of the NPF 2040, OREDP and the planned Maritime Spatial Plan/MSP, which is due by the EU in 2021. Seascape Character Assessment is defined below.

Seascape Character Assessment (SCA)	An assessment process relatively novel in Ireland, taken to include: - Views from land to sea - View from sea to land - Views along the coastline - The effect on landscape of the conjunction of sea and land Some additional areas on land may not be included that are coastal in character, but which may not have direct view of the sea, such as areas behind high sand dunes.
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(Source: Heritage Council and Partners LCA CPD Training Course Programme, 6 no. courses delivered during 2009-2011³³.)

Seascape Character Assessment (SCA) would support the implementation of National Policy Objective 43a - it is submitted that, to manage Ireland’s coastal resource, the character must first be assessed and a base-line established and changes monitored by the proposed Landscape Observatory of Ireland (LOI) with other key partners. In addition, given the unique topography and inter-visibility of the coastline of Ireland, particularly in the west, it would be useful for the NPF 2040 to include baseline data on the population living within 5 and 10 kms of the coast compared to the total population.

Trans-boundary planning issues are also relevant given the shared land and sea border with Northern Ireland. National Seascape Units should be developed asap, which link to the existing Northern Ireland Seascape Character Assessment (NISCA).

Creating a robust baseline of Ireland’s seascapes and seascape units would inform the following areas of strategic planning, as listed in the draft NPF 2040:

- *Sectoral – heritage and culture, community development, ports and harbours, tourism and leisure, energy – electricity and renewable energy, etc;*
- *Environment – climate change adaptation, water quality;*
- *Governance, Regulation and Licensing – consent processes for onshore and offshore development and activities, land-sea interaction;*
- *Data – research including spatial data management, cumulative effects, evidence-base, socio-economic profiles, etc.*

³³ E.g. to download the programme from the September 2010 LCA CPD Training Course, please see link: http://www.heritagecouncil.ie/content/files/landscape_character_assessment_cpd_training_course_september_2010_programme_4mb.pdf

7.2 Ireland's Unique Marine Cultural Heritage

As a sea-faring nation, the chapter on marine potential ignores the rich, multi-layered cultural heritage associated with our coastal areas including key sea-based events in Irish history such as the arrival of the Vikings and the Normans, the fate of the International Armada in 1588, the 1798 Rebellion and the War of Independence, etc. More recent events include Titanic's last port of call to Cork Harbour and tenders from Cobh (formerly Queenstown).

Ireland's coastal heritage reflects the interaction of humans and the coast from historic uses to contemporary activities. Historic uses of coastal areas include exploration, transport, trade and commerce, military and naval activity, exploitation of natural resources such as fish, seaweed, aquaculture, or recovery of flotsam and jetsam. Current uses of the coast including shipping, recreation and well-being/health, tourism, fishing, along with natural or ecosystem services, meaning those functions that natural systems such as dunes or estuaries provide, e.g. water purification, coastal protection, along with natural landforms which create our coastal landscapes or seascapes. All these elements and the interactions between them expressed through music and stories, place lore, and skills make up Ireland's coastal heritage.

Ireland's coasts are distinguished by majestic views or seascapes (coastal landscapes) of both stretches of wild coasts and sandy shores, and the dramatic urban port settings of Ireland's major cities and towns – at river mouths and estuaries – around the entire island.

Other striking features of our coastal heritage including lighthouses, Martello towers, small 19th century piers and harbours, unique types of boats, rich seabird life and marine mammals as well as seaside towns and customs have attracted the interest of visitors, artists and scientists over the years.

Coastal heritage straddles the land and sea; elements are on water such as boats and birds, and underwater such as wrecks, submerged landscape and fish. Much of our coastal heritage is under pressure from land slide development including urban sprawl, port expansion, demand for increased tourism facilities, new extractive and harvesting industries from aquaculture, declining water quality, declining fish stocks, changes to traditional industries and ways of life; the impacts of climate change such as sea level rise and increased storminess.

Seascape Character Assessment (SCA) would examine and explore the 'time-depth' of our coastal areas and would ensure that future plans and strategies including Regional Spatial and Economic Strategies (RSEs) are more accurate and robust, e.g. MSP. Given the planned National Maritime Spatial Plan by 2021, it is submitted that the NPF 2040 should include a national policy objective in relation to the EU MSP Directive.

In addition, the Heritage Council has collaborated with a number of remote coastal and island communities over many years and would welcome a national programme in the NPF 2040 to assist with their survival and to link them with other remote communities within the Atlantic Area and beyond.

7.3 The value of Ireland's Inland Waterways Network³⁴

The Heritage Council, through its significant number of Waterway Corridor Studies, has generated a vast body of evidence in relation to Ireland's inland waterways. These data sets and policy proposals constitute a valuable resource and baseline from which to progress the future planning and sustainable development of a valuable and historical national resource.

The Heritage Council would welcome more detail and support for Ireland's inland waterways, which are historic communication corridors including those under the management of Waterways Ireland (all-island body set up under the Belfast Agreement) and those waterways under separate navigation authorities such as the Corrib Navigation and disused ones such as the Ulster Canal.

By way of background to the history of these national heritage assets, an Act of 1715 created Commissioners who were empowered to raise money privately within their counties for the development of navigable waterways and canals and ultimately to charge tolls. By 1907, there had been a total expenditure of almost five million pounds on the completion and upkeep of 1,140km (712 miles) of inland navigation in Ireland, over half of which had come from private funders.³⁵ By 2010, 956km of the waterways were again navigable³⁶.

As noted above, up to £5 million was invested in the navigation network up to 1907. Given this level of the capital and maintenance investment, the relative *output* worth of £5,000,000 0s 0d from 1907 is, in today's terms, £4,630 million³⁷, using the share of Gross Domestic Product (GDP) approach. This translates into **€5.447 Billion €/Euro** worth of embedded capital in our inland waterway network. This figure does not include the investments in the inland waterways since 1907, including many major projects, such as the re-opening of the Ballinamore - Ballyconnell Canal.

The Heritage Council would submit that the NPF 2040 should recognise the significant socio-economic, environmental and cultural value of the inland waterways network for their localities and regions, and these cultural assets should be included as an important component of strategic infrastructure and the national transport network in the NPF 2040.

In addition, the national inland waterways have significant value as part of our natural heritage and accommodate significant 'sinks' of biodiversity, as they include many Natura 2000 sites and Special Protection Areas (SPA) for birds, particularly where river, lake and estuarine navigation is involved. The waterways form a significant part of Ireland's Green Infrastructure.

Ireland's inland waterways provide attractive environments for walking and cycling and can be utilised as greenways and blueways that contribute to the more active choices for work and leisure. The environment along many of the inland waterways (including canals) reach into numerous cities, large towns, towns and villages throughout the country.

A strategic approach to the waterways is imperative to ensure that the integrity of the network is not compromised and that their enjoyment is promoted and further enhanced.

³⁴ This section of the Heritage Council's submission has been prepared based on a report prepared by Ciaran Tracey MIPI on behalf of the Heritage Council – see *Integrated Policies and Objectives for the National Inland Waterways*, September 2017.

³⁵ Source: Atlas of the Irish Rural Landscape, Editors, F.H.A Aalen, Kevin Whelan and Mathew Stout, Cork University Press, 1997 cited in C. Tracey, 2017.

³⁶ <http://www.nationmaster.com/country-info/stats/Transport/Waterways>

³⁷ https://www.measuringworth.com/ukcompare/result.php?year_source=1907&amount=5&year_result=2016

The Heritage Council submits that efforts should be redoubled to promote this strategic approach to inland waterways management. These efforts should be effected by government departments, as well as all agencies – national, regional and local – with an interest in all inland waterways, both navigable and disused.

As such, the Heritage Council would submit that Ireland's Inland Waterways - which embrace issues of climate change, rural development, green infrastructure and biodiversity, historic and industrial landscapes, built and cultural heritage assets - should have specific and integrated national policy objectives within the NPF 2040.

8. WORKING WITH OUR NEIGHBOURS

The Heritage Council welcomes the inclusion of a section on Ireland and the European Union. We would recommend the inclusion of a number of important conventions in this section including, the:

1. *UNECE Aarhus Convention;*
2. *European Landscape Convention; and*
3. *Faro Convention.*

Given historic links and catchment patterns in the North West - the Heritage Council would submit that the Atlantic Economic Corridor (AEC) should be included in Chapter 7 – as Project No.2 in the NPF 2040 Section 7.2 – Working Together for Economic Advantage. This is particularly important given the airport and port in Derry and the perceived and actual remoteness of the North West.

As noted above, the Heritage Council supports the inclusion of the proposed Atlantic Economic Corridor in the NPF 2040 and is exploring the feasibility of setting up a network for relevant Local Authority Heritage Officers along the west coast to support this worthwhile government initiative. Given the emerging National Heritage Plan, the Heritage Council would also propose that an *Atlantic Economic Corridor Heritage Plan* be developed in support of a development strategy for the AEC – the Heritage Council would welcome discussions in this regard.

The Heritage Council would also wish to highlight that 'heritage' is missing from the National Policy Objective 45 on page 101 (Section 7.2). This is particularly important given the key tenets of the European Landscape Convention, as detailed above, and the Faro Convention³⁸.

In addition, as per our submission in March 2017, the Heritage Council recommends that future environmental assessment arrangements on the island of Ireland (on land and sea) should form part of the Brexit discussions and that the need for continued cross-border environmental assessment should be highlighted in the NPF 2040.

³⁸ <https://www.coe.int/en/web/culture-and-heritage/faro-convention>

9. NPF 2040 - GOVERNANCE, MONITORING AND IMPLEMENTATION

Finally, this section of the Heritage Council's submissions is set out under the following headings:

1. Implementing the National Planning Framework 2040;
2. Networks and Collaboration – Role for Departmental Co-ordination;
3. Need for a National Regeneration Agency;
4. National Investment Plan (NIP) and National Smart Growth Initiatives;
5. Evaluation of the NPF 2040 and National Policy Objectives – NPOs;
6. Summary of NPF 2040 National Policy Objectives – NPOs; and
7. Additional Resources for the Planning Unit and NPF 2040 Team.

9.1 Implementing the National Planning Framework 2040

The credibility and success of the National Planning Framework 2040 will depend on committed implementation, on being seen to have an impact, and on its responsiveness to changing circumstances. Careful consideration and a detailed implementation and monitoring plan should be an integral part of the NPF 2040.

There is a well-known management dictum that 'structure follows strategy' in terms of any implementation, yet other than the planned Office of the Planning Regulator, there is no mention of how such an all-encompassing framework will be delivered by numerous government departments and agencies in partnership with Irish communities, groups and individuals.

The Office of the Planning Regulator (OPR) is identified as a key aspect of regulating, monitoring and overseeing the implementation of the NPF 2040, but no timeline has been given for when the OPR is going to be in place or its agreed remit. There is an additional need for a Citizens' Forum to inform the monitoring in accordance with the UNECE Aarhus Convention. Is a Cabinet sub-committee envisaged as an element of the implementation structures and will the Cross Departmental Steering Group continue to meet in the future?

9.2 Networks and Collaboration – Role for Departmental Co-ordination

Given the scale and complexity of the challenges faced by Ireland as it envisages the achievement of goals for society, the environment and the economy by 2040, the demands on the resources of the State, and the resultant pressure for synergies, co-ordination and co-operation, and the importance of collaboration in a 'relationship-based' society such as Ireland, the Heritage Council would strongly recommend the creation of a new '*Mechanism for Public Sector Co-ordination*'.

The implementation of the National Planning Framework 2040 and associated National Investment Plan (NIP), must ensure that all sectoral plans and strategies are linked and integrated and that synergies and efficiencies in public expenditure are created for the betterment of social and human capital during the life-time of the NPF 2040.

This may require enhanced inter-departmental co-ordinating role and resources for the Department of Housing, Planning, Community and Local Government. This should be reflected in legislative provisions for the implementation and monitoring of the NPF 2040.

9.3 Need for a National Regeneration Agency

The Heritage Council submits that a national regeneration agency needs to be established under the provisions of the NPF 2040 to co-ordinate all the relevant national land and buildings reuse and development programmes.

This agency would also oversee a review of legislation required to empower and enable local communities to have more of a role and a voice in the socio-economic, environmental and cultural regeneration of their areas. This agency would link to other government initiatives including Creative Ireland, National Landscape Strategy 2015-2025, etc.

This regeneration agency would also benefit from collaboration on the proposed reviews of the Action Plan for Rural Development and the Tidy Towns Programme to ensure that ‘social capital’ is created through the proposed collaborative society, as set out in the vision part of the draft NPF 2040. This national regeneration agency would also undertake research and innovation programmes, in partnership with other bodies, to present national and regional measurements of social capital that are more suited to a ‘relationship-based’ society such as Ireland.

9.4 National Investment Plan (NIP) and National Smart Growth Initiatives

In relation to the National Investment Plan (NIP) and National Smart Growth Initiatives and transformational public realm initiatives – the Heritage Council has developed a number of regeneration and transformational public realm plan projects at various scales that are ‘good to go’.

For example, as noted above, several collaborative and award-winning public realm plans have been prepared in partnership with local authorities, local communities and chambers of commerce in Balbriggan, Birr, Cashel, Fethard and Roscrea.

Collaborative public realm plans are also underway in Tralee and Ballina - these projects follow on from Town Centre Health Checks (TCHC) using the Four-pillar model and 15-Step methodology developed by the Heritage Council and its Partners and undertaken during 2016/2017. It should be highlighted that all these plans link formally to the Irish Planning System as they have been adopted by the relevant local authorities.

The Heritage Council and its Partners have also developed a hugely-popular and successful collaborative Town Centre Health Check (TCHC) Training Programme, which requires significant investment from all partners in order to upscale from a ‘pilot’ to a ‘full’ national programme. As such, the Heritage Council would welcome discussions with the NPF 2040 team in relation to Heritage Council’s operations and initiatives that can support the delivery of the NPF 2040.

9.5 Evaluation of the NPF 2040 and National Policy Objectives – NPOs

It is unclear in the draft NPF 2040 what the role of the Irish Government Economic and Evaluation Service is in relation to the evaluation of the NPF 2040. The role of an international ‘peer reviewer’ is also unclear.

Given the focus in the NPF 2040 on the need for a collaborative and integrated society and a requirement for sustainable self-reliance, the Heritage Council would recommend that securing an international peer reviewer from Denmark or the Netherlands would be beneficial to the overall success of the NPF 2040. Such a collaboration would also assist in the widening and deepening of relationships with other EU Member States.

9.6 Summary of NPF 2040 National Policy Objectives - NPOs

For ease of communication, a summary of all the National Policy Objectives set out in the NPF 2040 should be provided at the start of the document in tabular format linked to the relevant chapter number, heading and page number along with annotated maps to illustrate the key issues. For ease of communications, the NPF 2040 Monitoring Reports could also be structured and presented to stakeholders and the Irish general public using this summary format.

9.7 Additional Resources for the Planning Unit and NPF 2040 Team

Finally, it is recommended that additional resources are put in place to support the Department's Planning Unit and NPF 2040 team to ensure the efficient and effective management, delivery, monitoring and evaluation of the NPF 2040 in the short, medium and long-term.

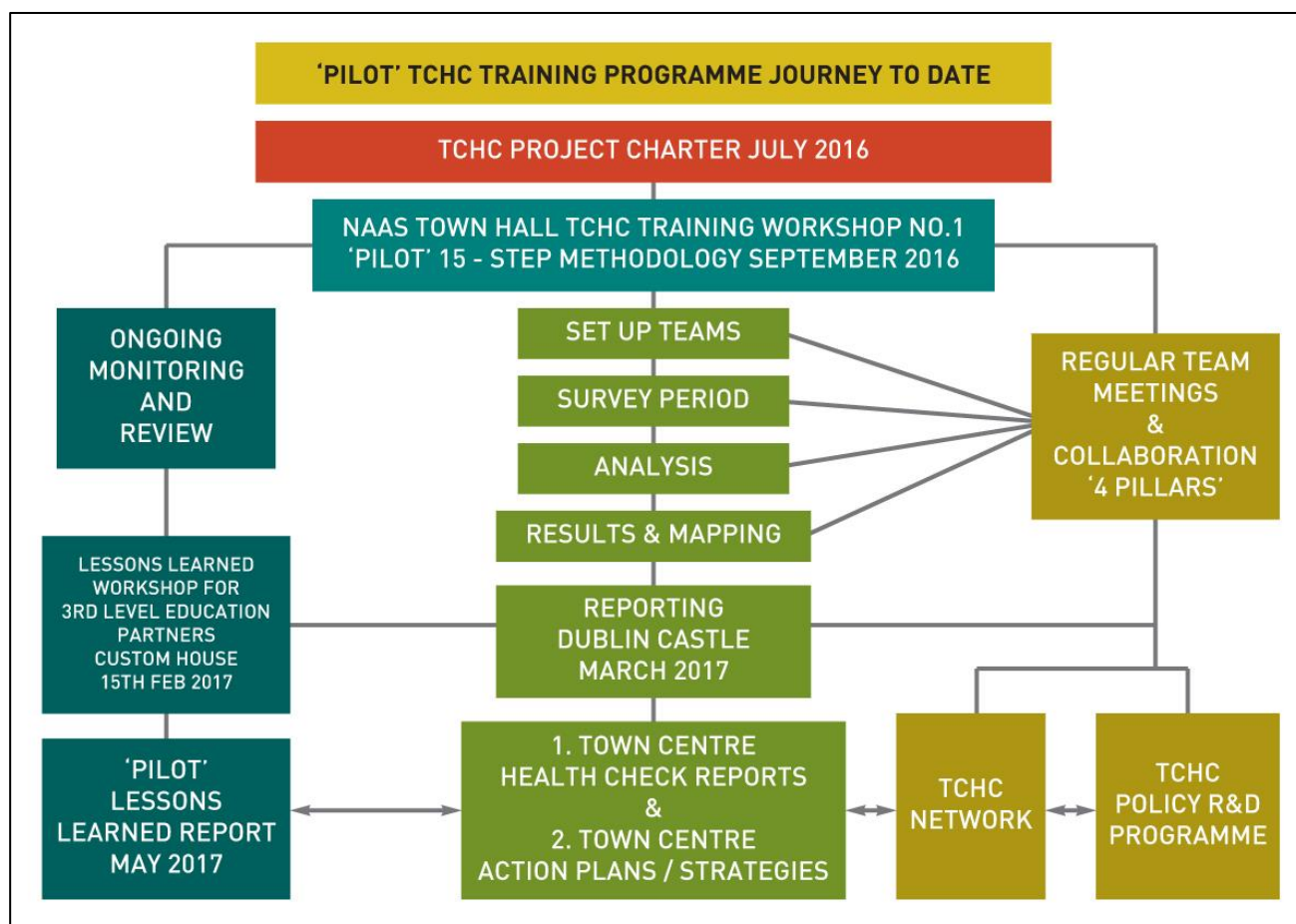
10. CONCLUSIONS AND FURTHER INFORMATION/CONTACT DETAILS

In conclusion, the Heritage Council welcomes the opportunity to participate in this latest round of public consultation for the National Planning Framework 2040. This submission follows on from submissions made by the Heritage Council in December 2016 and March 2017. From the sections above, it is clear that the Heritage Council has much to contribute in terms of the delivery and monitoring of the NPF 2040.

The Heritage Council would welcome a meeting with the NPF 2040 Project Team to discuss how our programmes can be up-scaled through the proposed National Investment Plan and also how the Heritage Council can contribute to the vision and emerging national policy objectives of the NPF 2040.

For further information on this submission, please contact Ali Harvey MIPI on aharvey@heritagecouncil.ie or on M. 087 419 3458.

Appendix A: Heritage Council and Partners – National ‘Pilot’ Town Centre Health Check Training Programme 2016/2017 – Flowchart of Pilot Process 2016/2017



(Source: A. Harvey, TCHC Workshop Pack No.2 for Dublin Castle³⁹, March 2017.)

³⁹ http://www.heritagecouncil.ie/content/files/Workshop_pack_Town_centre-health_check_March_2017.pdf