



An Chomhairle Oidhreachta
The Heritage Council



Submission to the National Planning Framework

March 2017

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1. Introduction

The Heritage Council is a prescribed authority or body for the purposes of the *Planning and Development Act 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'.*

This detailed submission sets out the Heritage Council's recommendations in relation to the emerging National Planning Framework (NPF) and deals specifically with our national heritage as provided for by the 1995 Act, which is currently under review.

2. Cultural Growth and Development as a 4th Pillar of Sustainable Development and the Faro Convention (CETS No. 199¹)

Cultural Growth and Development as a 4th Pillar of Sustainable Development

As noted in our submission of December 2016, cultural growth and development form an important part of overall sustainable development and, it is recommended, that this concept should be promoted through the formulation and delivery of the National Planning Framework. It is also recommended that the NPF should support emerging and existing national cultural policy such as *Creative Ireland, Culture 2025*² along with the commitment in the Programme for a Partnership Government to review and prepare an updated *National Heritage Plan*.

The Heritage Council's 2011 publication *Economic Evaluation of the Historic Environment Ireland* revealed that heritage and Ireland's historic environment is estimated to account for €1.5bn or 1% of the State's gross value added (GVA)³ and approximately 65,000 no. jobs. Clearly our national heritage is a valuable resource for socio-economic and cultural growth, social cohesion and human flourishing. As such, Ireland's national heritage is one of the key drivers of the tourism industry, is a key influencer on FDI, and is becoming more and more important in relation to sectors such as agri-food, which employed 8.4% of the working population and achieved revenues of €26 billion in 2015.

¹

<https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=0900001680083746>

² <http://www.ahrrga.gov.ie/arts/culture/culture-2025-2/>

³ GVA is the measure of the value of goods/services produced in a country, region or sector.

As well as setting out a national strategy and accompanying maps and relevant scenario modelling in relation to land use, infrastructure (urban and rural landscapes, green infrastructure, road, sea, air, cycling, energy, rail) the NPF should also map ecosystem services, built, cultural and natural heritage assets - including sites of international and national significance (archaeological areas, Architectural Conservation Areas, gardens, buildings, cultural landscapes, habitats), etc.

Council recommends that the NPF should underline the importance of spatial planning to enhance biodiversity and make appropriate specific commitments to the management of Natura 2000 sites and Green Infrastructure (GI). Also see – www.heritagemap.ie.

The NPF should also embrace and promote the key tenets of the *EIA Directive 2014/52/EU* (amending *Directive 2011/92/EU*) particularly in relation to the concepts of *cultural landscapes* and *ecosystem services* (see Heritage Council's submission in 2015 to the EPA's review of EIA Guidance and Advice Notes in this regard). We examine these issues in detail below.

Council of Europe Treaty Series No. 199 Faro Convention – sister convention to the European Landscape Convention (ELC)

In keeping with international patterns, Ireland has experienced the broadening of inclusivity and participation in cultural heritage. This perhaps is best represented by the figures for involvement in National Heritage Week (NHW) which grew to an estimated 405,000 no. people in 2015, a figure which crosses all ages and social groupings. In addition, the development of community archaeology has seen a broadening of participation by interested members of the public in heritage projects and this can be seen as an emerging aspect of practice represented in documents such as the Australia ICOMOS Burra Charter or the *Council of Europe Faro Convention on the Value of Cultural Heritage to Society*. Both the charter and convention highlight the need for greater public involvement in the opportunities and challenges which cultural heritage presents. While Ireland has yet to ratify the Faro Convention, participation, communication and public engagement are becoming more and more understood as basic elements of good/best practice heritage management and indeed spatial planning.

Reflecting this growing trend, much practice now situates heritage within the context of Place-making, heritage-led regeneration, and creating greater civic awareness/understanding, in order to deliver innovative conservation strategies and educational/training opportunities. The role of heritage in creating a sense and understanding of time-depth, of enhancing and promoting character, and in providing opportunities for engaging interpretation along with the generation of social capital must not be under-estimated.

Social connections to heritage, *per se*, are becoming stronger in an increasingly volatile global geo-political economy and as such, we would strongly recommend that the NPF embraces the key tenets of the *Faro Convention*, particularly in light of Brexit. We would further recommend that the NPF embraces the EU Faro Convention particularly given the planned European Year of Cultural Heritage (EYCH)⁴, which will take place during 2018.

In addition, we draw attention to the forthcoming Royal Irish Academy policy paper *Archaeology 2025*⁵ which the Heritage Council and a range of state bodies, organisations and private citizens have been involved in.

⁴ https://ec.europa.eu/culture/news/20160830-commission-proposal-cultural-heritage-2018_en

⁵ Royal Irish Academy (RIA) in press 2017. *Archaeology 2025* policy proposal paper, www.ria.ie.

This document, to be launched in May 2017, argues for greater investment in the state’s heritage services, improved practice and crucially the updating of cultural heritage legislation by the state. The report concludes that:

‘Critical shortcomings diminish the [archaeological] sectors’ ability to respond effectively to new programmes of planning and development. This will not only have a negative effect on Ireland’s archaeology but will also hinder and delay the sustainable development required to underpin the economy, including the provision of housing and other infrastructural development.’



(Source: Heritage Council Annual Report 2015.)

3. National Planning Framework (NPF) - SEA and the Role of Biodiversity, Landscape and Green Infrastructure (GI)

Strategic Environmental Assessment (SEA) is a process which, if applied iteratively to successive similar plans or programmes, should demand that policy be improved in terms of its beneficial effects on the environment. It should therefore be a priority of the 2017 NPF SEA process that it reviews the environmental performance of the 2002 National Spatial Strategy (NSS). The *Review of the National Spatial Strategy: Views of the Expert Group* (January 2014) provides a reasonable critique of the performance of the 2002 NSS.

The review calls for the identification of key policies and decisions that it seeks to influence. A cursory review of Ireland's environmental performance and geography today would yield the following key trends which can be quantitatively monitored:

- Rural housing with impacts on ground water quality, landscape character (urban, rural and peri-urban), greater carbon emissions through in-built car dependency, and which can be predicted to lead to future social isolation and increased cost in service delivery (postal service, broadband, health, water supply, etc.);
- Greater economic disparity between the Greater Dublin Area and the West/Atlantic Coast;
- Greater cultural resource redundancy (notably buildings, which can be measured in commercial and residential vacancy rates, but also in infrastructure such as road and railway lines, farmland desertion, etc.); and
- Biodiversity loss and landscape degradation.

Each of these factors can be monitored in the future and existing data sets can provide the baseline for trends during the period 2002 – 2017. These are relevant facts that should be the starting point for policy formulation for the NPF, and which should be especially highlighted at the Strategic Environmental Assessment (SEA) stage.

In relation to monitoring biodiversity, we would wish to highlight that the Heritage Council established the *National Biodiversity Data Centre*⁶ (NDBC) in 2007. The NDBC is the national centre for the collection, collation, management, analysis and dissemination of data on Ireland's biological diversity. The centre is funded by the Heritage Council and the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs. We would welcome discussions in terms of how the NDBC can assist in the preparation and monitoring of the NPF, in this regard.

SEA (and EIA) Trans-boundary implications in light of Brexit

Given that both the EU SEA and EIA Directives have a trans-boundary provision, it is submitted 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 National Planning Framework. This is particularly relevant given existing and proposed large-scale infrastructure on both sides of the border, e.g. north-south interconnector. In addition, assessment of future National Renewable Energy Action Plans (NREAP), Off-Shore Energy Renewable Development Plans (OREDPA), and large-scale on/off-shore renewable energy proposals will continue to be subject to these assessments in the Republic of Ireland. As such, it is unclear whether Britain/NI will continue to implement SEA and EIA (and indeed Appropriate Assessment (AA)) once they have exited the EU.

Landscape and SEA Policy Research – Heritage Council, EPA and Irish Landscape Institute

The Heritage Council has been working with the EPA SEA Unit for several years to ensure that strategic landscape planning and management issues are fully reflected in the SEA process in Ireland, in accordance with the key tenets of the European Landscape Convention (ELC)⁷. As highlighted in our December 2016 submission, the ELC is concerned with ALL landscapes/seascapes not just iconic or designated landscapes. The NPF provides a unique opportunity to support the implementation of the ELC along with the *National Landscape Strategy 2015-2025*, launched by the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs in May 2015.

⁶ <http://www.biodiversityireland.ie/>

⁷ EPA SEA Research has indicated that 82% of all SEAs in Ireland are related to land use planning.

Council has recently worked in partnership with the EPA Sea Unit and the Irish Landscape Institute (ILI) on a policy research study entitled: *Landscape Components in Strategic Environmental Assessment (SEA), 2016*. Section 6 – Recommendations, of the research report highlights that:

*‘...Inconsistencies exist on an all-Ireland basis in relation to landscape character and seascape character; this requires addressing and agreement on the best way to implement a national and/or regional level Landscape Character Assessment (LCA) and Seascape Character Assessment (SCA) for the Republic. It may be considered an opportune time to ensure that any national or regional level LCA in the Republic takes a similar approach to Northern Ireland to facilitate a consistent approach to landscape and seascape character assessment on an all-island basis. Should the decision be made in order to ensure consistency with Northern Ireland, regional scale LCAs should form the initial layer for the National Landscape Character Assessment – this would ensure complementarity with the Northern Ireland Regional LCAs. **This could be supported through the National Planning Framework (NPF) and help inform national and regional landuse and sectoral strategies...**’*

The successful delivery of the NPF will require greater collaborative and cross-governmental approaches, as well as linkages with other governmental priorities, and strategic landscape planning and management is a critical area, in this regard. We would recommend that the NPF is underpinned by the concepts of best practice landscape planning and management in order to inform strategic spatial planning during the period of the framework’s operation.

Linking the National Planning Framework (NPF) to the National Landscape Strategy (NLS)

Council submits that any NPF monitoring and review processes should link to, and be informed by, the emerging NLS-National Landscape Character Assessment (NLCA including historic landscape characterisation/HLC), which is currently being designed and developed by the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs. Ideally, significant investment in the NLCA, potential Regional LCAs and updated LA LCAs will create a robust *‘landscape hierarchy’* that informs and underpins the *‘planning hierarchy’* and related environmental assessment processes of SEA, EIA and AA. Following completion of the National Landscape Character Assessment (NLCA), it is recommended that investment in policy formulation is also required in order to produce robust Section 28 LCA/SCA Guidelines⁸ (or indeed guidance) – this requirement is particularly timely given Ireland’s obligation to prepare a *National Maritime Spatial Plan* by 2021 – we return to this issue in greater detail below.

Raising awareness of the wide-ranging benefits of Landscape Character Assessment (LCA) on a trans-boundary, national, regional and local scale can also be highlighted in the NPF, particularly in relation to environmental assessment. For example, the Heritage Council and Partner’s award-winning multi-disciplinary LCA CPD Training Course (2009-2011) identified the relevance and benefits of LCA, as follows:

- *Landscape Characterisation (including historic landscape characterisation/HLC) is a useful ‘tool’ for managing and enhancing– not preventing – change; and for enabling and encouraging long-term socio-economic and cultural growth and development;*
- *LCA can form the basis for spatial planning strategies/plans and decisions at a trans-boundary, national, regional, county and local level, e.g. NSS [i.e. now NPF including a potential settlement strategy], Regional Planning Guidelines [i.e. now RSEs], City/County Development Plans, Local Area Plans along with SEA, EIA and AA, for advising on land management and enhancement options;*

⁸ The existing draft *Landscape and Landscape Assessment Guidelines*, which have been in place since 2000, do not address or consider seascape character assessment (SCA).

- *LCA can inform the implementation of innovative forestry, agri-environment, maritime and tourism management and development strategies;*
- *LCA acts as a balance between landscape and other environmental objectives such as biodiversity and green infrastructure and as a tool for monitoring landscape change; and*
- *LCA presents exciting opportunities in relation to the future promotion of science, technology and innovation (STI) in Ireland.*

The NPF needs to be aware that a core national data set for land cover is needed to inform decision-making and decision-taking, in particular, in light of climate change as well as Ireland's obligations under the *UN Convention on Biological Diversity*. A consortium of departments and agencies⁹ are working to establish an authoritative source of this data, as a core layer within the emerging *National Digital Data Strategy* led by DPER. It is intended that this data set be collected and updated on a regular 3 to 5 year cycle and could therefore inform the NPF monitoring systems.

Landscape and Green Infrastructure (GI)

In addition, Green Infrastructure (GI) is an important part of sustainable development, as it connects the natural world to the human world. GI is defined as a strategically planned and managed network featuring high-quality biodiversity (uplands, wetlands, peatlands, rivers and coast), farmed and wooded lands and other green spaces that conserve ecosystem values thus providing essential services to society¹⁰ - this issue is also important for climate change adaptation.

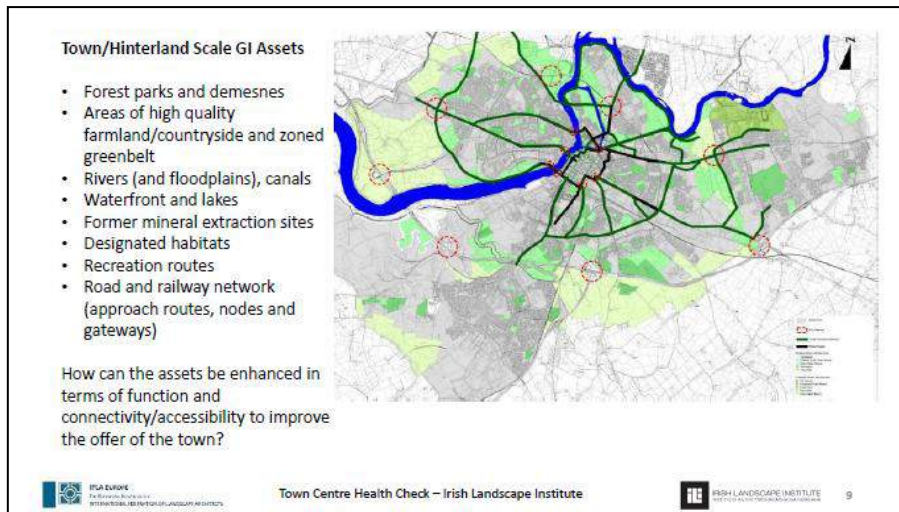
The role of green infrastructure and its importance in terms of benefits to humans has been set out in the *Our Sustainable Future, A Framework for Sustainable Development for Ireland* (DoECLG, 2012) as '*a network of green spaces that help conserve natural ecosystems and provide benefit to human populations through for example, water purification, flood control, food production and recreation*'. Given the commitment in *Our Sustainable Future* to implement green infrastructure in the planning system, it is strongly recommended that the NPF assesses and maps existing and proposed GI networks/assets on a national [and regional] level.

The Heritage Council can support the roll out of a national GI Strategy as part of the NPF, through its programmes/initiatives, LA Heritage Officer Network and the National Biodiversity Data Centre. For example, GI forms a crucial part of the Heritage Council and Partners' 'Pilot' Town Centre Health Check Training Programme 2016/2017 (30+ partner groups including Local Authorities, universities/institutes, Chambers of Commerce, Tidy Towns Groups, etc).

Indeed, the feedback from course attendees from the chambers of commerce and civic society 'pillars' following their first exposure to the concept and role of GI in 'spatial planning' has been overwhelmingly positive – see overleaf.

⁹ National Parks and Wildlife Service (DAHRRGA), EPA, Ordnance Survey Ireland, Heritage Council, GSI, Dept of Agriculture including the Forest Service, Teagasc.

¹⁰ Comhar CDC, 2010, cited in EPA, 2016. EPA Report No. 195, *Health Benefits from Biodiversity and Green Infrastructure*, Authors: C.Carlin, M. Cormican and M. Gormally, 2016.



(Source: ILI Presentation, HC and Partners' TCHC Training Programme 2016/2017).

4. Health and Well-being of People AND Places and Place-making:

The Heritage Council strongly endorses the statement in Chapter 2 – Ireland's National Planning Challenges of the NPF Issues and Concerns Report (page 15) that 'a *fundamental shift in how we do 'place making' in Ireland is likely to be required...*' along with a recognition in Chapter 3 – People's Health and Well-Being (page 21), that it will be necessary to consider:

- *Fostering an improved 'quality of life' offer for people through place-making and design that can be applied to every city, town and village in Ireland...*
- *Ensuring that healthy living options are available within communities in the form of access to sports and recreation facilities, amenities and green areas as well as walking and cycling facilities that can also assist in offering alternatives for travelling to school and work....'*

Good quality design is important in terms of creating a healthy 'life space'. Indeed the important links between good design and mental health are currently being promoted by the National Housing Agency¹¹.

The Heritage Council's collaborative programmes and initiatives, which are delivered in partnership with local authorities and local communities, also seek to promote the direct link between the health and well-being of People and Places, and which aim to enhance social cohesion, best-practice heritage and environmental management, and create socio-economic and cultural regeneration and social capital.

Council would welcome this integrated approach being embraced in the NPF and future NPF national investment programmes.

¹¹ <https://www.housingagency.ie/getattachment/79134c89-ba3c-4a6d-bae4-28560e2abe9a/Design-for-Mental-Health-Housing-Design-Guidelines.pdf>

The need for healthy places is important as the *Healthy Ireland Framework* states that: ‘*health is much more than an absence of disease or disability and individual health, and that of the country, because it affects the quality of everyone’s lived experience*’.

According to research by the EPA¹², ‘*recent studies suggest that people accrue greater benefits to their health and wellbeing from areas that are more diverse and perceived to be more natural, regardless of the setting (urban, peri-urban, rural) and, in particular that living near the coast was associated with greater overall health, regardless of wealth.... Other research has demonstrated the restorative value of landscapes and biodiversity in terms of stress management...*’

Recent research (March 2017) by the Institute for European Environmental Policy¹³ highlights that green areas are an important factor for individuals and communities establishing a ‘sense of place’ and ‘ownership’ of the landscape. Links to general well-being and sense of space and community are summarised in the box below:

- *Among visitors to protected areas, minorities and socially excluded groups are markedly under-represented, as are younger people;*
- *26% of the black and minority ethnic population in England visit natural environments less than three times a year – compared with 15% of the rest of the population;*
- *Nature increases positive emotions and feelings of vitality;*
- *Improved access to woodland near deprived urban communities in Scotland promoted green space use, increased activity levels and perceived quality of life;*
- *Seeing one’s neighbour at the local park can help to build familiarity, a sense of commonality, and sets the groundwork for future engagement.*

The Heritage Council commissioned a research team from the University of Cork in 2016¹⁴ to review contact with the outdoors and natural heritage among children in Ireland aged 5-12 years, which revealed the following:

- *In Ireland, children’s relationship with the natural environment has received little attention or support in national law and policy;*
- *An explicit and overarching national policy which supports children’s engagement with the outdoors is yet to be developed;*
- *There are significant *benefits*, including health and well-being, to contact with the outdoors and the environment.*

Council would recommend that the NPF should include policy to promote greater use by children of the outdoors and the natural environment. A copy of the Heritage Council’s report is included with this submission.

¹² EPA Report No. 195, *Health Benefits from Biodiversity and Green Infrastructure*, Authors: C. Carlin, M. Cormican and M. Gormally, 2016

¹³ *Nature for Health and Equity*, Institute for European Environmental Policy and Friends of the Earth Europe, March 2017 - <http://www.foeeurope.org/nature-health-equity>

¹⁴ *Children and the Outdoors, Contact with the Outdoors and Natural Heritage Among Children aged 5 to12: Current Trends, Benefits, Barriers and Research Requirements*, University College Cork for the Heritage Council, 2016.

Returning to the EPA's research (2016), the report also states that, *'there is a need for a multi-disciplinary learning on the part of ecologists, planners, engineers, landscape architects, health promotion officers and social scientists, which could be met through site visits in the short term and training courses in the long-term'* and that *'University courses and continuous professional development/CPD courses must offer more ways to integrate nature into created spaces to increase physical activity and wellbeing'*. The EPA report continues: *'...such a course could contribute to transforming practice through research-informed policy in Ireland, e.g. The National Planning Framework.'* In addition, it should be noted that Action 35 of the National Physical Activity Plan for Ireland¹⁵ (DoH, 2016) prioritises the need to develop a programme of CPD regarding the role of physical activity for those working in developing the built environment.

Given the Heritage Council's experience in developing and delivering successful, multi-disciplinary CPD courses with multiple partners in Ireland and abroad, we would welcome discussions on this national training proposal as part of the formulation of the NPF.

National Heritage Week

One of the Heritage Council's flagship programmes – **National Heritage Week** – seeks to enhance community engagement and community cohesion associated with our national heritage, and is ultimately a generator of social capital and higher tourism activity. A summary of interesting facts about NHW 2016 set out below:

- Estimated attendance at National Heritage Week 2016 was 435,580 people, up from 405, 300 people in 2015, i.e. a 7.5% increase in one year;
- 46% of attendees brought children;
- There were 1,083 event organisers in 2016, up from 960 in 2015;
- There were approximately 15,000 people involved in organising events across Ireland;
- 77% of organisers used Facebook to promote events (up from 67% in 2015);
- Total revenue generated = €22,687,386*

*Using Failte Ireland revenue estimation.

Health and Well-being of Places/Place-making:

The Heritage Council's policy to enhance Place-making and regeneration in Irish Towns-see *Policy Proposals for Ireland's Towns (2015)*¹⁶, states that:

'Roughly one third of Irish people live in towns, with another third in the five big cities. Irish towns have many qualities, some of them overlooked, and they are experiencing rapid change. Many of our main streets are losing their historic urban character, their cultural and social value and their economic vitality through both under-use and over-development.....New models for the management of special urban places, derived from international norms, for example, the Historic Urban Landscape approach promoted by the United Nations Educational, Scientific and Cultural Organisation (UNESCO), can be applied to Irish towns. This requires the further integration of heritage practices into planning, especially regarding community engagement in plan-making to protect the qualities of places for the people who possess them and use them most. New forms of community and stakeholder engagement need to be explored to ensure that the benefits of heritage-led urban regeneration make a perceptible difference to the people who live in and enjoy towns. The Heritage Council proposes to build upon its existing networks and projects to achieve this through the creation of a rural towns and villages network....'

¹⁵ <http://www.getirelandactive.ie/Professionals/National-PA-Plan.pdf>

¹⁶ http://www.heritagecouncil.ie/content/files/policy_proposals_irelands_towns_2015_5mb.pdf

In addition, Council has a strong track record of designing and delivering numerous collaborative national programmes that promote the health and well-being of People and Place along with Place-making and regeneration initiatives, in partnership with local communities, relevant authorities/agencies, and NGOs. Our various Place-making and regeneration initiatives are summarised in *Table 1* and a short description of each programme/initiative is set out below. Council would submit that a strong commitment from the NPF's national investment programme would ensure that these successful Place-making and regeneration programmes continue to be rolled out across the State, in collaboration with our partner groups at a national, regional and local level.

Table 1: Summary of collaborative Place-making Initiatives (Heritage Council and Partners)

Heritage Council Place-making Initiative	Status and Area Covered	Established
'Pilot' Town Centre Health Check (TCHC) Training Programme	Links to statutory LAPs - 8 'pilot' towns including county towns: Ballina, Cashel, Dundalk, Ennis, Monaghan, Naas, Rush, Tralee. 'Pilot' methodology sets out 15-step collaborative process.	2016
Community-led Village Design Statement (CLVDS) Toolkit	Links to statutory county/city development plans - focuses on two 'pilot' villages, one urban (Sandymount, Dublin) and one rural (Julianstown, Co. Meath) – sets out 8-Step collaborative and participative process.	2012
Traditional Farm Buildings	Links to Green Low-carbon Agri-environment scheme (GLAS), previously Rural Environmental Protection Scheme REPS	2009
National Collaborative Public Realm Plan (PRP) Programme for Historic Towns	Links to statutory LAPs – Balbriggan, Birr, Cashel, Fethard, Roscrea and Wicklow.	2006
Irish Walled Towns Network/ITWN – HTN	All-island – 28 walled towns – currently undergoing transformation into wider Historic Towns Network/HTN	IWTN 2005/ HTN – 2017

'Pilot' Town Centre Health Check Training Programme

The Heritage Council in partnership with RGDATA, DoHPCLG, DoAHRGA, the IPI, ILI, RIAI and the Housing Agency organised a second 'pilot' TCHC training workshop at Dublin Castle in March 2017 for approximately 130 people (i.e. TCHC Workshop No. 2 of 2) as part of the 'pilot' training programme. During the workshop, a group exercise was undertaken in relation to the needs of historic town centres and the formulation of the National Planning Framework (NPF). The results from the TCHC Workshop group exercise are provided at *Appendix B*. A summary of the key strategic ideas which could be developed into potential NPF national investment programmes, are listed in the box below:

- *Need to invest in a full National Town Centre Health Check (TCHC) Programme – TCHCs to be prepared on a two-year rolling programme;*
- *Introduce a National Town Centre Manager (TCM) Programme and establish National Town Centre Networks– support regular training/ workshops – encourage collaboration between towns/regions, e.g. 3 Sisters in the South-East;*
- *Link SEA/Landuse to planning legislation and policy – use SEA indicators that link to TCHCs;*
- *Recognise the important role of towns outside of the major cities in public policy;*
- *Invest in Green Infrastructure (GI) and Blueway programmes in and between town centres;*

- *Retail Planning Policy not sufficient to protect town centres – should be a Town Centre policy promoting walkability and liveability, plus encourage stricter control of out-of-town development; and*
- *Invest in urban design and urban designers within the planning system.*

We would strongly support the rolling out of the above as part of the NPF's national investment programme and would welcome any discussions in this regard.

Community-led Village Design Statement Toolkit¹⁷¹⁸

The *Community-led VDS Toolkit* (100 pages) and accompanying multi-disciplinary training workshop for 100 civic leaders (which was over-subscribed) were developed by the Heritage Council in collaboration with the local village communities in Julianstown (rural pilot) and Sandymount (urban pilot), in partnership with Meath County Council and Dublin City Council. Council wishes to highlight that this worth-while initiative has been significantly under-resourced in recent years. However, we submit that the CLVDS Toolkit is an important spatial planning and heritage management tool, which embraces and supports the aims and objectives of the NPF.

Traditional Farm Buildings

The grant scheme was conceived of, and valorised as, a contribution to the conservation and regeneration of the Irish rural landscape character through active repair of structures for agricultural use and hence restoration of degraded rural landscapes.

The European Commission has accepted that better targeting of agri-environment payments is necessary and is envisaged in the framework of the CAP post-2013. According to the EU Commission Joint Research Report (2012), *'direct payments have led to the continuation of farming in marginal areas, the preservation of extensive grazing system and the conservation of traditional rural landscapes'*. As a sector-specific measure, the traditional farm buildings grant scheme is already demonstrating this approach serving as an exemplar to others, whilst delivering tangible environmental benefits which are both immediate and long lasting.

Since the programme began in 2009, the Heritage Council has ensured the conservation and sustainable reuse of 460 no. traditional outbuildings countrywide and, in doing so, is promoting resource efficiency, supporting the shift towards a low-carbon resilient economy and sustainable land management as well as effective regional development. As noted above, our everyday built environment isn't valued enough as a constituent of our communal lives and 'shared' landscapes. As landscapes undergo continuous, irreversible, and inevitable processes of transformation, effective policies should focus on managing acceptable and appropriate changes over time, dealing with conserving, respecting, and enhancing heritage and cultural values.

National Public Realm Plan Programme for Historic Towns

This national programme was introduced by the Heritage Council initially through its Irish Walled Towns Network (IWTN) in 2006, in partnership with the local authorities, government departments, Tidy Towns and Spatial Planning Units, Fáilte Ireland and Chambers Ireland. The programme's success resulted in its expansion to include other [non-walled] historic towns. The public realm refers to areas of a town or city to which the public has access - it includes streets, footpaths, parks, squares, bridges and public/civic buildings and facilities.

¹⁷ <http://www.heritagecouncil.ie/projects/community-led-village-design-statements>

¹⁸ The Heritage Council and Partner's *Community-led Village Design Statement Toolkit* (and associated training workshop) was the recipient of the Irish Planning Institute's National Award for Planning Innovation in 2014.

These public spaces give a town its character and also determine how inhabitants and visitors move around, interact and use the town's environs. The public realm therefore has a significant impact on how a town or city functions and on its attractiveness as a place in which to live and work, and as a destination for tourism and investment. How a town's public realm is planned, designed and managed is therefore very important.

Public Realm Plans set out the details of phased co-ordinated projects that will enhance and revitalise the way historic town centres function on a day-to-day basis. A PRP's goal is to provide long-term socio-economic, cultural and environmental benefits for residents, communities, businesses, and visitors. Successful collaborative PRPs have been prepared and are currently being delivered in Balbriggan, Birr, Cashel, Fethard, Roscrea and Wicklow.

Irish Walled Towns Network/Historic Towns /Living Cities

As noted above, historic Irish towns have many qualities, some of which are overlooked, and they are experiencing rapid change. Many of our main streets are losing their historic urban character, their cultural and social value, and their economic vitality through both under-use and over-development. In response, the Heritage Council is currently transforming the Irish Walled Towns Network (IWTN), which was established in 2005, into a broader Historic Towns Network (HTN). The context for this has been set out by the Heritage Council in *Policy Proposals for Ireland's Towns* (2015), the IWTN proposal *Helping Towns help themselves* (2015), and in the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs recently published *Action Plan for Rural Ireland* (2017).

The HTN is also based on experience gained from a 2013-14 joint 'pilot' Historic Towns Initiative in Listowel, Westport and Youghal backed by the Heritage Council, Fáilte Ireland and the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs and the three relevant local authorities.

The underlying vision in the HTN initiative is maintaining historic towns as attractive and vibrant places to live, work and visit, where the heritage of the town is seen as a resource to contribute to the overall identity of the town, to the enhancement of its presentation and to the creation of exciting experiences for residents and visitors. Through this new Historic Towns Network, the Heritage Council will advocate for the future care of historic towns as an essential element of effective regional development and tourism policy.

As such, it is submitted that the partnership between the agencies and departments of government, local government, the various communities and their business sectors should be supported through the implementation of the NPF.

It is submitted that Council's suite of Place-making and regeneration programmes can therefore inform and support the formulation of the NPF and we would welcome further discussions in this regard. We would also be happy to provide more information on our operations, if required.

5. Adaptation to Climate Change

In relation to climate change, Council recommends that the NPF should, alongside the National Adaptation Framework, facilitate the requisite national and all-island, long-term response to the threat posed by climate impacts to vulnerable areas, both man-made and natural. The NPF should promote an integrated approach to climate adaptation, and allow the philosophical and physical space for adaptative measures, including relocation; it should endeavour to prevent sectoral attitudes to climate adaptation as this can lead to mal-adaptative strategies and actions being taken by a single sector with costly and serious impacts to others.

The NPF should work with the National Adaptation Framework, encouraging the application of green or soft climate change adaptation measures as the option of choice. Much of Ireland's heritage both natural and cultural including the urban cores of our major cities and towns located on the coast, on estuaries and rivers, are at risk to changing rain fall patterns, increased extreme events, and rising sea levels.

Green and soft adaptation measures (as noted above in Section 3) are frequently harmonious with the management of many aspects of heritage along with being cost-effective and compatible with community needs. See also www.climateireland.ie.

Climate Change Mitigation and Renewable Energy

The NPF should also take into account and support Ireland's international obligations to global climate mitigation targets and should put in place a robust, fit-for-purpose, planning framework for renewable energy. As noted above, work carried out in 2013 by the Heritage Council on wind energy¹⁹ identified the urgent need for such a framework and appropriate Section 28 Guidelines. As technologies change the NPF must have the capacity to respond to new or changing technologies in this domain.

Energy Conservation and Historic Buildings

Approximately 25% of the residential housing stock in use on Census night 2016 is traditionally built (i.e. with solid masonry walls). If national energy use is to be reduced in the medium term, effective, user-satisfying measures need to be devised and implemented to make existing historic buildings less expensive to inhabit.

Through a stakeholder colloquium, a research project to be carried out in 2017 and policy advocacy, the Heritage Council is seeking to explore administrative mechanisms and funding models to achieve this. In particular, land use planning policy should support the satisfactory thermal performance of the stock of buildings in towns.

The embodied energy in their construction and their agglomeration in localities where services of all sorts are efficiently provided is clearly an energy-efficient and sustainable use of existing resources. The National Planning Framework should advocate that guidance be produced to ensure that effective improvements in thermal performance can be effectively implemented at various scales.

6. Maritime Spatial Planning and Seascape Character Assessment (SCA)

In 2006, approximately 60% of the Irish population lived less than 10km from the coast. Accordingly, the need to consider coastal pressures, the need for integrated coastal management, improved seascape assessment and the potential impact of climate change in this area is extremely important and should form a core part of the NPF. The Heritage Council endorses the importance the NPF puts on islands and coastal areas based on its experience in this field e.g. Bere Island Conservation Plan and initiative from 2000 until present.

The Heritage Council proposes that in order to balance the needs of these communities alongside larger interests and opportunities in the coastal and marine areas, the NPF must facilitate the use of tools such as Integrated Coastal Zone Management (ICZM) alongside Maritime Spatial Planning (MSP).

¹⁹ *The Onshore Wind Farm Sector in Ireland – Planning in Harmony with Heritage, Policy Research Paper (Vols.1 and 2)*, A. Harvey and K. Moloney, Heritage Council, 2013.

Together these will provide a co-ordinated and dynamic approach to the management of the coastal zone, integrating the heritage and other assets of the coastline and will provide the foundation for the planned *National Maritime Spatial Plan*, which is due to be prepared by 2021.

In response to the “Key Questions” on page 41 of the NPF Issues and Concerns Report, the Heritage Council would submit that Maritime Spatial Planning (MSP) is a spatial planning tool that deals with legal rights and property - MSP may not provide the necessary, wider people-centered approach, nor deal with the land/sea interface satisfactorily, while Integrated Coastal Zone Management (ICZM) is recognised generally as of particular importance in relation to managing the impacts of climate change on vulnerable coastal areas due to the multi-sectoral, people-centred approach. ICZM is process-driven, involves participatory methods and should be used in specific areas to manage conflicting needs and pressures on our coasts particularly in the light of Sea Level Rise (SLR), increased extreme weather events, the expansion of our ports and needs of tourism and heritage management. Two centres of excellence for ICZM exist in Ireland – Marei in UCC, and UU in Coleraine. It is submitted that their development could potentially be the focus for the NPF’s proposed investment programmes.

Experience in Integrated Coastal Zone Management on this island goes back at least to the 1990s through the European Demonstration Programme for Coastal Management 1996-9²⁰ where two projects took place – the Bantry Bay Charter, Co Cork and Rural Beach Management Strategy, Co. Donegal. As a result of the demonstration programme, the **Recommendation** concerning the implementation of Integrated Coastal Zone Management in Europe was adopted on 30 May 2002²¹ by the European Parliament. This lists eight principles defining ICZM including integration across sectors and levels of governance, as well as a participatory and knowledge-based approach. Based on these principles, the 2002 Recommendation outlines steps which the Member States should take to develop national strategies for ICZM.

In relation to Seascape Character Assessment (SCA), there is clearly a need for a robust policy framework for this expanding sector - as noted above, the existing draft *Landscape and Landscape Assessment Guidelines*, which have been in place since 2000, do not address or consider seascape character assessment (SCA). Heritage Council research undertaken in 2006 and 2009 indicates that local authority LCAs do not always consider the concept of seascapes – and there are also no detailed seascape assessments in place in Ireland at a regional level or national level (apart from the seascape assessment that was undertaken as part of the SEA for the Off-Shore Renewable Energy Development Plan/OREDP).

²⁰ <http://ec.europa.eu/environment/iczm/demopgm.htm>

²¹ 2002/413/EC - <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2002:148:0024:0027:EN:PDF>

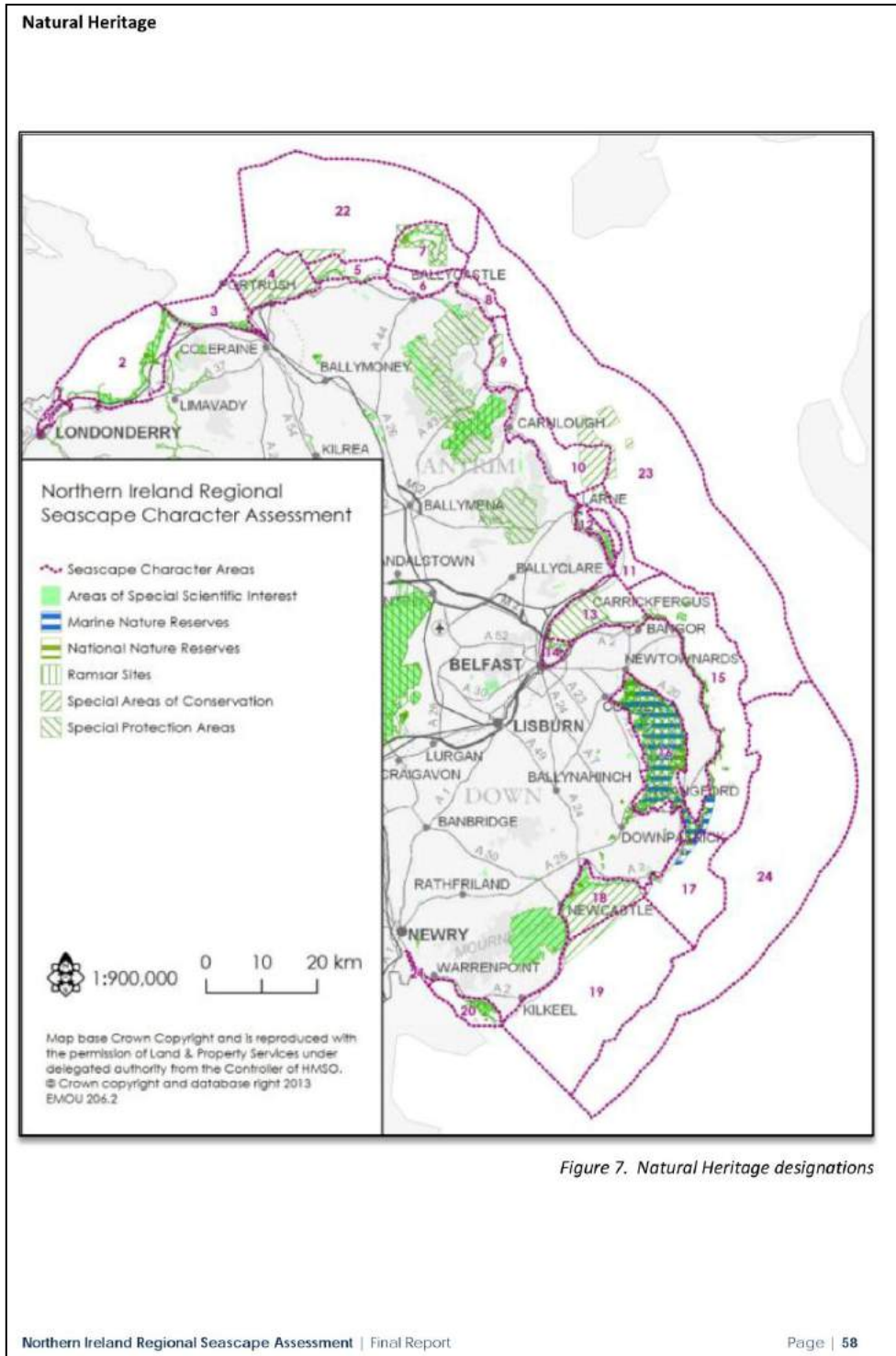


Figure 7. Natural Heritage designations

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(Extract from the Northern Ireland Regional Seascape Character Assessment, 2014.)

Given the Maritime Spatial Planning Directive 2014/89/EU and planned legislation in 2016 (since enacted), the Heritage Council undertook research into existing international seascape planning, seascape characterisation and assessment practice in 2016. The seascape assessment research is enclosed with this submission.

The Heritage Council would further recommend that *Statements of Public Participation* should be required for all SEA and EIA-related marine projects supported through the NPF – see *Statement of Public Participation for the Welsh National Marine Plan (2014)*²².

7. Further Information/Contact Details

If you require further information, please contact **Alison Harvey** MIPI AII at aharvey@heritagecouncil.ie or M. 087 419 3458.

²² <https://www.valeofglamorgan.gov.uk/Documents/Committee%20Reports/Cabinet/2014/14-03-24/WG-Consultation-Document-The-Statement-of-Public-Participation.pdf>

Appendix A:
Priority Recommendations from SEA/Landscape policy research study – Heritage Council, EPA SEA Unit and the Irish Landscape Institute, September 2016

SEA and Landscape - PRIORITY RECOMMENDATIONS:

SEAL01: SEA and Landscape Guidance. In the identified best practice SEAs, guidance was available and followed for landscape and SEA. Given the key national plans/policies and programmes proposed over 2016/2017 such as the National Planning Framework (DoHPCLG) and the Renewable Electricity Policy Development Framework (DoCENR) amongst others, in order for landscape to be meaningfully considered throughout the SEA process, advice notes/guidance should be produced that provides advice on considering landscape from Screening through to Scoping, Environmental Report and SEA Statement. This guidance could highlight good practice, useful examples through case studies as well as data sources and methodologies. Existing guidance could be adopted in conjunction with other Government Departments, possibly from the Scottish Natural Heritage Guidance on Landscape and SEA.

SEAL02: Pilot a Landscape-Led SEA for a key SEA Sector. As with any environmental parameter, a good quality baseline is critical. In terms of piloting a landscape led SEA, supporting such an approach for a recently completed LCA in a new plan preparation could be very informative. Given that the Donegal LCA is being finalised currently and the development plan will commence its review in 2016, this could be a useful pilot of the approach suggested. Alternatively, Meath County Development Plan is shortly for review and this county has a robust LCA already. Outside town and country (spatial) planning, opportunities exist to pilot a landscape led approach across other sectors with support from other Government Departments including the Department of Arts, Heritage and the Gaeltacht and Department of Communications, Energy and Natural Resources. This would link with Action 7 of the National Landscape Strategy. Lessons learnt from these could be used to inform SEA and Landscape Guidance.

SEAL03: Provide LCA Guidelines: There is an urgent need to provide useful guidance on how to undertake LCA. This is supported through Actions 2, 3 and 4 of the National Landscape Strategy. There is scope to adapt guidance from the UK to the Irish context which would have the benefit of facilitating greater consistency with the Northern Ireland LCA approach. These guidelines could provide the methodology for the National LCA. Such guidance would also provide an agreed terminology which would assist in a consistent approach to use of terminology and require a statutory basis through Section 28 of the Planning and Development Acts, as amended. Such guidance should also be prepared for Seascape and Historic Landscape Characterisation (HLC).

SEAL04: Establish a National LCA and SEA Baseline: Inconsistencies exist on an all Ireland basis in relation to landscape character and seascape character; this requires addressing and agreement on the best way to implement a national or regional level LCA and SCA for the Republic. It may be considered an opportune time to ensure that any national or regional level LCA in the Republic takes a similar approach to Northern Ireland to facilitate a consistent approach to landscape and seascape character assessment on an all-island basis. Should the decision be made in order to ensure consistency with Northern Ireland, regional scale LCAs should form the initial layer for the National Landscape Character Assessment –this would ensure complementarity with the Northern Ireland Regional LCAs. This could be supported through the National Planning Framework and NSS and help inform national and regional landuse and sectoral strategies. This would be supported through Action 1 of the NLS. The option to prepare /refresh/update more local and county level LCAs would then be delivered through the local authority structure. ***This Recommendation relates also to SEAL05.***

SEAL05: Reconvene the Heritage Council and Partners award-winning CDP Training Module in LCA. The best practice SEAs identified showed a good technical understanding of landscape character both by the practitioners and also the statutory agencies consulted through the SEA steps. The research has shown that considerable in house/institutional expertise in landscape assists greatly in ensuring landscape is meaningfully addressed in the SEA process. An awareness of the potential impacts of different sectors on landscape is required and could help integrate the requirements of the European Landscape Convention (ELC) into plans, programmes etc.

The two-day residential CDP course on LCA developed and delivered by the Heritage Council and Partners over three years (2009 to 2011, two courses per year) helped raise awareness and increase capacity in this area; three of the planners who subsequently undertook the Donegal LCA attended this course in September 2011. Training courses as Continued Professional Development and the addition of a landscape specific element in currently offered SEA courses in Ireland should be supported. Further expansion of this course, web based training, and specific landscape elements at primary, secondary and tertiary levels would also be in line with other recommended actions.

Appendix B:
Dublin Castle – Town Centre Health Check (TCHC) Workshop No.2, 16th March 2017
Group Exercise 2: National Planning Framework – Ireland 2040, Our Plan
What is needed for our Town Centres?
Responses/Ideas from Workshop Attendees

LEGISLATION & POLICY	INVESTMENT & INCENTIVES
<ul style="list-style-type: none"> • Recognise the important role of towns outside of the major cities in public policy • Greater and more effective Interdepartmental co-operation and co-ordination • Simplify planning policy and building regulations – humanise: make is easy, plain English information • Settlement strategies and approach to urban-generated growth to focus on need/requirement for living in the town centre • Link SEA/Landuse to planning legislation and policy – use indicators that link to TCHCs • Town centres are more than ‘retail’ –need robust policy that utilises the opportunity for locally-tailored approaches • Regulatory Impact Assessment (RIA) – is the new law needed? Will it have negative impacts? • Greater community consultation for public (Part 8) proposals and interventions • Sequential test/approach needed for ALL development – strict enforcement of policy • Retail Planning Policy not sufficient to protect town centres – should be town centre policy promoting walkability and liveability, plus encourage stricter control of out-of-town development • Encourage People-friendly centres – no cars close by and walkable/pedestrian friendly centres - consideration of ageing population • Broaden the exemption and changes of use between use classes • Easier CPO processes to address vacancy and dereliction needed, particularly backland areas/sites • Parking policy needed to assist town centre regeneration • Involve secondary education sector in town centre policy formulation - e.g. transition students -as they are the future 	<ul style="list-style-type: none"> • Invest in a <i>National Town Centre Health Check Programme</i> asap – TCHCs to be funded and completed every two years – evidence-based data, etc. Link to SEA, etc. • Significant investment needed in public realm – national programme required – collective benefits to be monitored and measured (see below) – (currently seen as a cost not an investment) • Extend Living Cities initiative to Irish towns • More PPPs for infrastructure programmes/projects including public realm; • Try out area-based tax incentives to balance brown v greenfield development – need to dis-incentivise out of town car parking – level playing field? • Invest in Green Infrastructure (GI) and Blueway programmes in and between town centres • Increase investment in town and village renewal schemes – incentivise businesses to create great spaces – include large towns • Introduce incentives for community engagement and place-making projects • Funding for LAs to invest in town centres needed – site assembly, vacancy, etc. • Repair and Lease – address reluctance to invest in building stock due to gains going to pay off bank debts • Initiate and encourage heritage-led regeneration • Make town centre development affordable • Introduce disincentives for vacant properties – best practice elsewhere? • Introduce incentives for missing services particularly reuse of vacant buildings for arts/social projects (tax breaks) • Introduce push and pull measures to reduce vacancy – incentivise and site value tax • Investment in communication on town centre issues needed– establish exchange and platform for sharing

<p style="text-align: center;">LEGISLATION & POLICY cont'd</p>	<p style="text-align: center;">INVESTMENT & INCENTIVES cont'd</p>
<ul style="list-style-type: none"> • Ensure that local taxes 'stay local' • Fairer subventions for large towns/counties • Promote cross-border co-operation and programmes following Brexit • Legislation needed to enforce removal of dog poop!! 	<ul style="list-style-type: none"> • Promote <i>Living over the Shop</i> or similar strategic incentives for living in towns • Consolidation of funding rather than Rural Economic Development Zones/T&VRS, etc. – too dispersed/little impact • Funding to allow for CPO – backland sites or for LA to co-operate with individual land owners • Investment to allow Local Authorities to fund LAPs with increased engagement and consultation with communities of place and communities of interest • More resources for Building Regs. and building control • Rates and development levy incentives for niche businesses and independent retailers • Invest in collaboration/dialogue between different professionals/practitioners – collaborative CPD for planning and management of town centres – celebrate diversity • Invest in urban design and urban designers within the planning system
<p style="text-align: center;">NETWORKS & STUCTURES NATIONAL/INTERNATIONAL</p>	<p style="text-align: center;">RESEARCH AND DEVELOPMENT (R&D)</p>
<ul style="list-style-type: none"> • All-Ireland approach needed - more co-ordination and integration between government departments, LAs and marketing groups, etc. • Introduce a National Town Centre Manager (TCM) Programme and establish National Town Centre Networks– support regular training/ workshops – encourage collaboration between towns/regions, e.g. 3 Sisters – need new structures at a regional and national level asap • Multi-disciplinary Town Teams needed along with innovative Community Structures as means of involving all sectors of the community – roads/transport, forward planning, economic development, enterprise, etc. 	<ul style="list-style-type: none"> • Create agreed national standards to compare for <i>Town Centre Health Checks</i> – update on a regular basis – e.g. what is the national average rate for vacancy? • Greater investment is needed into the role and function of Irish Towns • Need to work with 3rd education levels more – build on work of 'Pilot' TCHC Training Programme – mutual and collective benefits – enhances public awareness of the importance of our historic town centres • Undertake research or set up a 'pilot' programme on accessibility and walkability of Irish town centres and connectivity to their suburbs • Research needed for comparative analysis of town centre activity and performance • More innovation and interest from local government – research should address

<ul style="list-style-type: none"> • <i>One-Stop Shop</i> for town centre management an investment - remove systemic blockages asap – e.g. reduce burden of upper floor conversions • Create local networks with good connection to local authorities – (expenses paid where necessary) • Town Champions are needed – Mayor directly elected) – bring back Town Councils! • Local Authorities are more than rates collectors – we need to have a passion for ‘Irish Towns’ • Introduce collaborative planning processes with some authority to make decisions, e.g. vacancy • Formulate a spatial plan for the Dublin Region and towns within • Create a network of sustainable growth centres – e.g. Dublin-Belfast corridor • More continuity of departmental responsibilities following change of government • Engagement/communication – notify local community in advance of proposed policy for town centres –engage public in planning • ‘Bottom-Up’ approach should be advocated/facilitated in order to reduce social alienation • Who should prioritise which town of the many towns the Local Authority administer? This is difficult for LAs – needs an independent review panel – what is best practice elsewhere? 	<p>sustainability and climate change</p> <ul style="list-style-type: none"> • In-depth research needed into the causes of vacancy in town centres – economic appraisals as to the ‘costs’ of vacancy – both private and social costs • Research needed into retail trends and the retail function of our town centres – what is a good mix – how to cater to millennials, etc. • Draw together facts/data re. town centres and depoliticise the message – promote the ‘common good’ and cultural heritage • Research needed on various coping mechanisms for Brexit re. Derry/Donnegal strategy • Forecast of business space needed and appropriate planning policy approaches • A suite of Best Practice Manuals need to be developed for town centres – <i>Plan- Act- Evaluate</i> • Proposals for town centres need to be measurable and assessed for effectiveness • Research into parking and traffic management in town centres needed and connections into town –develop more visuals and models to communicate concept and impact on commercial and cultural historic cores • Footfall counters need to be rolled out in all Irish towns – need to collect and manage data on a regular basis • Regular monitoring and assessment of Public Liability claims – trends and patterns?
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Thanks to all involved!!

For further information on the ‘Pilot’ National TCHC Training Programme, please contact Ali Harvey, aharvey@heritagecouncil.ie M. 087 419 3458