

ICOMOS IRELAND SUBMISSION RE NATIONAL PLANNING FRAMEWORK 2040

ICOMOS Ireland is pleased to make this submission to the National Planning Framework 2040.

ICOMOS Ireland has previously made a submission to the Draft in March 2017, under the auspices of 'Baile' it's Working Group on urban centres, towns and villages. We append this again as part of this submission as it remains relevant to the National Planning Framework 2040.

ICOMOS, the International Council on Monuments and Sites, is a global non-governmental organization associated with UNESCO. Its mission is to promote the conservation, protection, use and enhancement of monuments, building complexes and sites. It participates in the development of principles and the evolution and distribution of ideas, and conducts advocacy. ICOMOS is an Advisory Body of the World Heritage Committee for the implementation of the World Heritage Convention of UNESCO. As such, it reviews the nominations of cultural world heritage and ensures the conservation status of properties.

ICOMOS is a network of experts that benefits from the interdisciplinary exchange of its members, among which are architects, historians, archaeologists, art historians, geographers, anthropologists, engineers and town planners.

ICOMOS Ireland considers the National Planning Framework 2040 can only successfully address the challenges ahead – be they climate change, housing need or, the revitalization of our towns – if we treat the historic landscape and the contemporary as a single, albeit complex, entity with communities at the fore and engaging with both the tangible and intangible dimensions of cultural heritage which acknowledge and enable diversity and identity. In this regard, ICOMOS Ireland considers that the many relevant ICOMOS principles documents which it has produced, provide an essential framework for strategic and local planning, management, development and protection. Of particular relevance to the National Planning Framework are the following ICOMOS Charters, Principles, Resolutions and Declarations (all available at <http://www.icomos.org/en/charters-and-texts>):

- International Charter for the Conservation and Restoration of Monuments and Sites (Venice Charter 1964)
- Charter for the Conservation of Historic Towns and Urban Areas (Washington Charter 1987)
- Charter for the Protection and Management of the Archaeological Heritage (1990)
- Charter on the Protection and Management of Underwater Cultural Heritage (1996)
- International Cultural Tourism Charter (1999)
- Joint ICOMOS – TICCHI Principles for the Conservation of Industrial Heritage Sites, Structures, Areas and Landscapes (2011)
- The Valletta Principles for the Safeguarding and Management of Historic Cities, Towns and Urban Areas (2011)
- The Quebec Declaration on the Preservation of the Spirit of the Place (2008)
- The Paris Declaration on heritage as a driver of development (2011)
- The (Australia ICOMOS) Charter for the Conservation of Places of Cultural Significance (the Burra Charter), 1982
- Dresden Declaration on Flood Protection for Historic Sites, 2014

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There are a number of allied international charters, conventions, etc., which might also be considered and which align with the objectives and focus of the ICOMOS documents listed above.

- UN Sustainable Development Goals 2030: <http://www.un.org/sustainabledevelopment/sustainable-development-goals/> . ICOMOS International has established a Focal Group (with two ICOMOS Ireland members) focusing on Localising the SDGs. The National Planning Framework 2040 should consider implementing a monitoring regime against the objectives of the SDGs
- Habitat 3 New Urban Agenda: <http://habitat3.org/the-new-urban-agenda/>
- Convention on the Value of Cultural Heritage for Society (Faro Convention), 2005 <https://www.coe.int/en/web/culture-and-heritage/faro-convention>
- Unesco Recommendations on the Historic Urban Landscape (2011) <http://whc.unesco.org/en/hul/> . It can be noted that these Recommendations are referenced in the Dublin City Development Plan 2016-2022 as follows:

The strategic approach to the protection and enhancement of the city's built heritage shall be guided by the recommendations on the Historic Urban Environment adopted on 10 November 2011 by UNESCO's General Conference, providing for the historic urban landscape approach that sees urban heritage as a social, cultural and economic asset for the development of cities, with tangible and intangible urban heritage as sources of social cohesion, factors of diversity and drivers of creativity, innovation and urban regeneration". (Section 11.1.4)

Many of the above listed documents, in particular the more recent, acknowledge the imperative for a sustainable and integrated approach to spatial planning, one which recognises the priority of communities and the significance of local context.

The increasingly complex nature of planning for a sustainable future for Ireland demands integrated and multi-disciplinary approaches from the outset. So, for example, in planning for the implications of climate change and the inevitability of increased flooding of our existing/historic settlements, the principles laid out in the Dresden Declaration on Flood Protection for Historic Sites, can be usefully applied at the Strategic Environmental Assessment and all subsequent stages through detailed design, implementation and monitoring. This Declaration arose from considered research and multi-disciplinary collaboration following the disastrous flooding in Europe in 2013.

UNESCO designations, specifically World Heritage Sites, but also UNESCO Global Geoparks should be formally recognised as important international acknowledgement of the global importance of Ireland's historic sites and natural and cultural landscapes. The recognition of the importance of preserving their attributes, and specifically the outstanding universal value of our World Heritage Sites should be formally embedded in the planning system and recognised in national planning policy. Local authorities should be supported in highlighting the protection, management and presentation of these sites and landscapes as objectives in their county development plans.

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ICOMOS Ireland considers that the National Planning Framework 2040 can be refined and implemented with regard to emerging international theory and principles which increasingly acknowledges the historic and contemporary built environment as a single entity – this includes the urban and rural landscapes, as shaped and perceived by man. Shaping our environment is a cultural act and that we do this in a high quality way is critical for the well-being of society – which will also assist in a healthy economy.

Ireland's commitments to reduce energy emissions imply a much greater reuse of existing buildings (resources) – the expectation being that in 2050, 90% of existing buildings in the EU will remain and be in active use. Greater education and capacity building within related professions, communities and the general public is necessary in order to successfully repair, reuse, adapt our existing built resources – buildings and landscapes. Reference to the international principles identified above in this submission, can be very useful in this regard and provide a framework with which the inherent complexities of historic places can be successfully protected and developed.

There are two current research projects underway within ICOMOS Ireland National Scientific Committees which can feed into and inform the National Planning Framework. Baile, the -3- towns, villages and urban working group, has completed a 3 stage project which seeks to explore issues surrounding the heritage-led regeneration of small Irish towns and villages with specific reference to the re-use of traditional street buildings and with a particular emphasis on public engagement in the built environment (www.irishtownsandvillages.ie). And, the National Scientific Committee on Energy and Sustainability is partnering with the Heritage Council on a significant research study into deep energy retrofit of traditionally constructed buildings. Both these research projects speak to an ICOMOS objective to assist in identifying and advocating appropriate measures which can help resolve blockages – regulatory; technical; economic and, cultural – with regard to the regeneration of those towns, villages and urban centres which are struggling to remain viably functioning. ICOMOS Ireland notes their primary importance as places to live, however in addition to some technical, economic and regulatory challenges, it is important that a renewed interest and skill in urban living is promoted and advocated in a positive way under the National Planning Framework 2040. To be successful, people will need to be attracted back into towns and of primary importance will be the belief that towns are pleasant and attractive places to live (the public realm, access to good facilities, services and amenities), as well as the quality of the homes themselves (thus the importance of quality standards). In the rush to address immediate issues (crises), it would be ultimately self-defeating if long-term quality is curtailed. The physical investment of built developments will generally last a long time, so it is critical to ensure quality.

ICOMOS Ireland notes the importance of our existing buildings and urban settlements in contributing to our immediate and long-term requirements for housing and, other functions of a sustainable community. In ensuring this existing resource can meet contemporary requirements and standards, there is a need for more sophisticated and considered understanding of appropriate and creative reuse and renovation of our historic buildings. This may also require some flexibility in existing standards, which are primarily aimed at new build.

In light of the above concerns ICOMOS Ireland has recently taken a greater focus on housing and urban regeneration within the historic centres of our towns and villages and are would be pleased to contribute to the government's endeavours in this also.

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Conclusion:

ICOMOS Ireland is a voluntary body of multi-disciplinary experts within the broad field of cultural heritage. The organisation is actively engaged at an international level within ICOMOS and is thus a significant body of knowledge and current thinking and practice which is disseminated at the local level and can be made available to government.

We trust that the information and considerations set out in this submission will be useful to the further refinement and implementation of the National Planning Framework 2040. We would be pleased to be consulted further at any/all stages of this important process and would be happy to provide additional and direct contribution to the Department of Housing, Planning and Local Government on these matters.

ICOMOS IRELAND
7 November 2017

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BaB

**POLICIES AND ACTIONS TO PROMOTE THE REGENERATION OF
IRISH TOWNS AND VILLAGES:**

SUBMITTED BY 'BAILE', WORKING GROUP OF ICOMOS IRELAND, MARCH 2017

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The following observations are made on foot of the forthcoming preparation of a new National Planning Framework. We are a working group of ICOMOS Ireland, meeting under the name 'Baile', interested in matters related to the planning, management and conservation of historic towns and villages. ICOMOS Ireland is the national branch of an international NGO of almost 12000 practitioners working to promote the application of theory, methodology and scientific techniques to the conservation of our cultural heritage. The organisation has 29 international scientific committees, each with a different focus; its international committee on the conservation of historic towns and villages is known as CIVVIH (Comité International des Villes et Villages Historique) and our working group reflects its aims in the Irish context. Included in our group are conservation/heritage professionals working in the areas of architecture, town planning and policy-making within the public and private sectors.

ICOMOS Ireland is part of the organising committee for the annual ICOMOS international scientific symposium with a 2018 theme of Sustainability and is working to help realise the UN Sustainable Development Goals (SDGs) which Ireland signed up to at Habitat III in November 2016 and the New Urban Agenda into the future. This document identifies relevant SDGs by their reference numbers at certain headings in order to connect the proposed actions to these stated goals.



It is well-established that small-medium sized Irish towns are currently in crisis. The urban core of many towns no longer supports a range of business, retail, social and residential activities, and unoccupied or under-used buildings are now common-place.

Policies that encourage people to live in towns should be adopted nationally, regionally and locally (whether this is in existing buildings or new-build developments in infill sites) as this is likely to re-invigorate town centres and increase their attractiveness as places to live. In addition, measures should be taken to encourage the re-use of existing buildings and the preservation of the historic fabric of towns and villages. It is essential that a coordinated approach is adopted whereby national policies and legislation feed into regional and local development plans. The following submission has been divided into four main themes:

1. Living in towns;
2. Environmental issues;
3. Economic issues;
4. Zoning matters.

Each theme examines issues as they might be approached on a national level (e.g. requiring legislative change); on a regional level (relevant to County Development Plans); or at a local level (typically addressed by Local Area Plans, or other local strategies).



1.0 LIVING IN TOWNS

It is the surviving buildings, structures, streetscapes and the places and interlinking spaces that they form that make each town and village unique. This historic fabric should be recognised as a key element in the potential regeneration of any urban centre. Above all, it should not be forgotten that towns are places in which to live.

1.1 NATIONAL LEVEL ACTION

1.1.1 Standards for new build:

Adopt a high (but achievable) level of standards, i.e. specified minimum standards for size, number of rooms, daylight, orientation, access to outdoor space, quality of build, materials, insulation, BER, finishes etc. All new development will be extant for many years to come; we should be aiming for best quality buildings to be inherited by future generations.

1.1.2 Variety of typologies:

A variety of dwelling types should be encouraged and explored (houses, apartment, duplex etc. – various sizes & layouts to suit families of different compositions, couples, families with children, the elderly etc.); the objective should be to have a mix of ages, family sizes and social backgrounds in order to create a viable community within the town centre. National policies and/or financial incentives intended to encourage development and growth should not emphasise one dwelling type above others.

1.1.3 Incentivise private development within town centres:

Consideration should be given to the promotion of incentives that would encourage private development to take place in town centres. This could include tax breaks and grant assistance under town renewal and retrofit schemes for works to existing buildings, extensions to existing and part-new build or new-build on infill sites within the urban core.

The recent ICOMOS / Heritage Council colloquium on Deep Energy Retrofitting for Traditional Buildings addressed some of these issues and several existing schemes were discussed. It is suggested that these retrofit schemes and incentives should be expanded in scope and eligibility.

See also points 3.1.1 and 4.2.1 below.



1.2 REGIONAL LEVEL ACTIONS

1.2.1 Flexibility in Building Control

Encourage a non-prescriptive approach to the Building Regulations (i.e. applying alternative solutions to the prima facie examples as set out in TGDs when dealing with existing buildings) by actively engaging in consultation (e.g. Part B, Part M), particularly in the case of the re-use of existing buildings, where the TGDs cannot always be applied. Local authorities should be facilitated to allocate specific resources to this end. Support testing and/or analysis to establish verifiable data which can inform guidance for historic buildings. It is worth noting that while it is provided for in the Building Regulations, a non-prescriptive approach is difficult to apply in practice as the required level of consultation and advice is not available in most building control authorities due to lack of resources.

1.2.2 Location of public services

It is within the gift of local authorities (and indeed state-run bodies) to strengthen the urban core of our towns by carefully considering the location of public services (e.g. schools, libraries, healthcare, nursing homes, county council offices etc.). These facilities should be situated within the central urban area wherever possible, providing reasons for people to spend time in towns. All opportunities for connection within the urban fabric should be taken (i.e. interlinking of routes though the town, particularly on foot/bicycle). The provision of such facilities can also provide opportunities to create exemplars in the re-use of existing buildings. Resources should be allocated appropriately in order to facilitate the re-use of existing buildings and brownfield sites, which can involve a greater capital outlay in comparison with greenfield development, but which will deliver more long-term benefits for a town and its inhabitants.

1.2.3 Location of local authority/social housing schemes:

New social housing schemes should be located in existing structures or on infill sites wherever possible. This would help to re-populate urban centres and provide more diverse living patterns than the large single-tenure estates located on the edges of towns, as often developed in the past. This approach will work best where private development is also located within town centres in order to achieve a balanced urban community and range of tenure types (see point 1.1.3 above).

Similarly, sheltered housing for the elderly/infirm should also be located within the urban centres. This would allow for the greater integration of this sector of society in town/community life. It is increasingly likely that new typologies of housing for the elderly and for multi-generational living will



be required as the age profile of the country shifts; this provides an opportunity as well as a challenge. The advantages of proximity in the town/village context are of benefit to social groups such as the elderly and disabled, with opportunities for positive integration with a wider demography through sharing services and amenities.

1.2.4 Parking strategy

It is accepted that parking issues provide a significant challenge in the successful regeneration of towns. When parking is difficult to find or costly, it is all too easy for shoppers to use retail centres on the peripheries of towns where parking is plentiful and free. Despite this, many towns continue to charge a fee for on-street and municipal parking as it provides a valuable revenue stream. Means of offsetting this parking income should be considered on a regional level along with ways of encouraging the development of under-used backlands for parking (perhaps particularly for business owners/employees and future new town centre residents) that might free-up parking on-street for short-term use. New parking arrangements could be linked to campaigns for a healthier lifestyle (e.g. park and walk).

1.3 LOCAL LEVEL ACTIONS

1.3.1 Streetscape

Introduce specified standards for materials to be used for the renewal of public spaces (e.g. natural stone paving in important areas, near significant historic buildings).

Co-ordinate all new street furniture, lighting schemes, paving schemes etc. and rationalise signage and poles/lampposts.

Identify existing historic features and materials (wrought iron railings and gates, stone bollards, kerbstones, plinth walls, steps, cast iron covers, lamp standards etc.) and select and design new additions in a complementary manner. Thus distinctive character and identity of place is recognised and enhanced.

Give careful consideration to proposed uses of buildings in relation to public spaces (e.g. overlooking and passive surveillance, night-time uses in proximity to residential etc.).

1.3.2 Amenities

Towns are traditionally places where access to rivers and canals is available, but frequently ignored. These amenities should be developed, as they provide opportunities for walking, fishing, leisure uses



etc. that are not as easily provided outside towns due to poor access, or land ownership issues. In order to achieve this it is important that integrated routes are identified in local area plans. Thus a riverside or canalside walk should be part of a network of paths that link these places with the town centre, schools, community centres, houses etc.



2.0 ENVIRONMENTAL

The issue of sustainability and climate change is of increasing significance and relevance in all areas of society, not least in the area of planning and development. Ireland signed up to the UN Sustainable Development Goals. SDG11 '*Sustainable Cities and Communities: Make cities and human settlements inclusive, safe, resilient and sustainable*', at Habitat III, in Quito, (Nov.2016).

The re-use of existing building stock and the consolidation of our historic town centres as places of commerce, habitation and social interaction, within a defined area in which resources can be shared efficiently, should be a prime objective for society at this juncture.

2.1 NATIONAL LEVEL ACTIONS

2.1.1 Energy usage/wastage: (SDG 1, 2, 3, 7, 11, 12, 13, 15)

'the greenest building is the one already built'

The construction of new buildings where there are plenty of opportunities for re-use represents a waste of materials and energy. Even allowing for the upgrading of fabric that may be required, the embodied energy of an existing structure is considerable. Counteracting abandonment and consolidating town centres as places where business can be transacted, social encounters take place and a high standard of living is available, reduces unnecessary journeys by car and allows more families to survive with a single car, where two would have been required previously. This should be considered as part of our commitment under the Paris Agreement. as well as Habitat III The Irish Green Buildings Council has recently highlighted this issue and is participating in an international collaborative project (Build Upon) on building renovation and retrofitting, which could have a very positive impact on existing towns. It should be noted however that any such renovation projects would require a specialist skills base to deal with the conditions and requirements of historic building construction.

2.1.3 Shared services: (SDG 11,12 ,13)

Services such as fixed-line broadband can be provided much more efficiently to the population of a town, with a reasonable density, than to individual houses spread throughout the countryside. Such provision is key to the survival and growth of regional areas, as it is critical for the establishment of new business and attracting new residents from the cities.

2.1.4 One-off houses (SDG 11, 12, 13)



A national policy should be developed that challenges the accepted cultural norm of building one-off houses outside existing urban centres. This would act as a buttress to policies adopted at local authority level, where pressure for such development is most keenly felt and where policies for 'local need' development have not always been consistently adopted and applied. Complementary measures to make it easier for development to take place within urban centres along with advocacy and implementation of actions that advance and enhance urban living would also be of support.

2.2 REGIONAL LEVEL ACTIONS

2.2.1 Septic tanks: (SDG 6, 12)

The proliferation of septic tanks is an acknowledged problem that needs to be addressed. Dwellings located within urban centres can be connected to mains sewerage. Policies that adopted a more restrictive attitude to the development of one-off-houses on the edge of towns, in favour of housing within towns, are more sustainable and fit with our commitments as part of the EU as well as Habitat III.

2.2.2 Infrastructure: (SDG 3, 6, 11, 12)

Development plans and other strategies should encourage the use of existing infrastructure and the development of infrastructure that will benefit larger groups of people rather than facilitating low-density development. This should take place in the context of the enhancement of existing infrastructure (e.g. the public realm) in order to improve the overall attractiveness of towns as places to live and to facilitate more widespread recognition of their inherent value and uniqueness.

2.2.3 Health aspects: (SDG 3)

More compact and interconnected urban centres create more opportunities for walking.

Living within towns provides greater opportunities for cycling (this might be most significant for the young/school going age groups).

Separate cycleways and pedestrian walkways should be identified whenever possible in order to provide the greatest amenity value.

Shared facilities such as pocket parks/playgrounds/skateparks etc. can be better utilised by the whole community when urban centres are interconnected.

Interconnected routes (e.g. between schools, churches, town centre, amenities etc.) for both walking and cycling should be identified and continuously developed.



3.0 ECONOMIC **(SDG8 – DECENT WORK AND SUSTAINED INCLUSIVE ECONOMIC GROWTH)**

Regional towns are traditional centres of commerce that have existed and developed over a long period. These should be re-invigorated/re-established, as their influence over the surrounding rural hinterland is significant.

3.1 NATIONAL LEVEL ACTION

3.1.1 Affordability:

Affordability of houses in towns is a key issue: the re-use of existing structures/dwellings can be costly in comparison to new-build (inevitably located on the edges of towns). This could be addressed by a site value tax or other financial instrument/incentive. Also, the importance of challenging the culture of one-off housing (see above) is also relevant in this context.

3.2 REGIONAL LEVEL ACTION

3.2.1 Supporting financial opportunities: (SDG 8)

Opportunities to spend money locally should be prioritised through zoning/land uses by the restriction of large out-of-town shopping centres. Small and medium-sized business should be supported along with large sized commercial premises where the retailer is prepared to locate within the town centre. There are numerous examples of large grocery outlets successfully trading in town centre locations when there is a willingness to depart from 'big box' premises, and/or where they can be accommodated in backlands. Leading on from this, employment opportunities will be created locally in cases where small businesses can now survive. A virtuous cycle can be created once a critical level of inhabitation and activity is reached. Support for smaller local businesses plays an essential part in this process and the Local Enterprise Office network is a significant stakeholder.

3.3 LOCAL LEVEL ACTION

3.3.1 Re-use of buildings as a resource: (SDG 11, 13)

The Local Enterprise Office network could be used to put in place schemes for learning trades/skills and appropriate specifications and materials that would be utilised in the re-use of existing structures (e.g. roofing, plumbing, electrics, plastering etc. and also potentially specialist skills such as ironmongery, conservation joinery, thatching etc.) thus reducing costs. Currently a scheme to retrofit insulation is used in this manner – this could be extended to other skills/trades. Local



initiatives to support and encourage building maintenance should also be established, whereby economies of scale could be achieved for property owners/occupiers, an entire town would benefit from regular upkeep and local employment would be generated.

4.0 ZONING

4.1 NATIONAL LEVEL ACTION

4.1.1 New zoning strategy

Investigate the possibility of widening the zoning strategy by allowing the zoning of upper floors separately (i.e. allow commercial/retail uses at ground floor and residential uses above). This would reflect the fact that towns can be places with a tightly woven fabric, where various activities can comfortably take place within a small area. The implications of doing so would include considering how the imposition of rates/local property tax etc. , would be managed.

4.2 REGIONAL LEVEL ACTIONS

4.2.1 Promote infill development: (SDG 11)

Re-use and/or infill development should be encouraged/permitted ahead of greenfield development wherever possible with an emphasis on high-quality of design for infill/backland proposals.

4.2.2 Land-use matrices: (SDG 11, 16 ,17)

Land-use matrices in development plans should be used to favour mixed re-use of existing buildings within the urban core ahead of edge-of-town sites in terms of permitted development.

4.2.3 Targeted policies: (SDG 16, 17: *Build effective, accountable and inclusive institutions at all levels*)

Specific policies and guidance should be included in development plans regarding out-of-town shopping, petrol stations shops etc. Also, traffic policies should aim to create good quality pedestrian provision in town centres and routes for traffic within the town but not through the centre.

4.3 LOCAL LEVEL ACTIONS

4.3.1 Local policies: (SDG17 – *Strengthen implementation and revitalise the Global partnership for sustainable development*)



Specific policies for individual towns to facilitate heritage-led regeneration such as those discussed herein should be put forward in Town Development Plans, Local Area Plans, Settlement Plans etc. – these plans should be informed by an analysis of what each town/village could be and fed-into locally by a consultation process. This would encourage more strategic thinking, decisions informed by local needs and the possibility of linking with rural requirements of the hinterlands of towns.

Design Statements (as per the Limerick County Development Plan) or other similar reports/documents required as part of the planning process could be used to encourage development within urban areas, for example by requiring comparative analysis of site locations for new housing (i.e. is greenfield development necessary when brownfield sites are available?).

3D plans and/or village design statements (e.g. as prepared for Mulranny, Co. Mayo) can act as a valuable aid in the planning process. These should provide an emphasis on heritage-led regeneration.

Many successful town regeneration projects undertaken to date in Ireland have either been led by, or involved, a designated design professional (e.g. town architect, county architect, county architect's department etc.). Consideration should be given to increasing the number of these roles and examining how local authority resources are utilised, even for relatively small schemes. Local level engagement and empowerment are important objectives and require particular skills; these skills should be developed within the local authority structure.

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