



NPF Submissions
Forward Planning Section
Department of Housing, Planning, Community and Local Government
Custom House
Dublin D01 W6X0.

By email to npf@housing.gov.ie

10th November 2017

Re. Ireland 2040: Our Plan - Draft National Planning Framework

Dear Sir or Madam,

The Irish Georgian Society welcomes this opportunity to comment on the Draft National Planning Framework as part of the Stage 2 public consultation.

The Irish Georgian Society is a membership organisation, which encourages and promotes the conservation of distinguished examples of architecture and the allied arts of all periods in Ireland. These aims are achieved through our education programmes, by supporting and undertaking conservation works, publishing original research, planning participation and fundraising. The Society has had a marked and widely acknowledged impact on the conservation of built heritage in the state and has wide experience of the problems associated with the restoration, repair and maintenance of the fabric of historic property.

Management of built heritage is a key pillar of sustainable development

The Society welcomes the strong emphasis in the Draft National Planning Framework on the vital importance of the active use of built heritage assets to proper planning and sustainable development, including meeting future housing needs:

“Ireland’s built heritage assets are a non-renewable resource that merit being nurtured in a manner appropriate to their significance and aid to understanding the past, contributing to community well-being and quality of life as well as regional economic development.

Our market towns and estate villages sit alongside more modern, but equally distinctive settlements that knit modern architecture with the existing historic urban heritage. Investment in our towns and villages through regeneration, public realm improvements and the appropriate adaptation and reuse of our built heritage, acts as a key factor in developing, promoting and investing in a sense of place and aligning the objectives of creating high quality with that of spatial planning.

National Policy Objective 16

Enhance, integrate and protect the special physical, social, economic and cultural value of built heritage assets through appropriate and sensitive use now and for future generations.” (at page 66)

The Society also welcomes the requirement set out, at page 87, that existing building stock be included by planning authorities in calculations of housing need in statutory plans:

“Building stock that is in a state of obsolescence has the potential to offer transformative options for housing and as part of the original fabric of some settlements can serve to further preserve the heritage and cultural identity of a place. Reuse of existing building stock must be accounted for and considered as part of any evidence basis for housing policy formation and at a local level, this will form part of development plan core strategies.”

It is of concern, however, that the Draft National Planning Framework places such a strong emphasis on the sustainable reuse and regeneration of the historic environment in the context of rural areas. It is unclear why a similar emphasis on reuse of existing heritage assets in urban areas would not be included in the Draft National Planning Framework, particularly given that the majority of such assets are located in urban areas.

The Society notes that a key action of the Draft National Planning Framework will be to make *“the continuous development and regeneration of existing built up areas as attractive and as viable as greenfield development.”* In this regard, an objective of the Draft National Planning Framework should be to publicise the findings of existing research on the benefits of building reuse and to carry out more research, where relevant. For example, *Built to Last: The Sustainable Reuse of Buildings*, published by Dublin City Council and the Heritage Council in 2004, found that *“constructing new buildings on brown-field sites is more expensive than retaining and re-using existing buildings except in situations where the extent of building repair and refurbishment required is extremely high”*. Moreover, the 2011 publication *The Greenest Building: Quantifying the Environmental Value of Building Reuse* of the Preservation Green Lab (a part of the National Trust for Historic Preservation) provides that *“reuse of buildings with an average level of energy performance consistently offers immediate climate-change impact reductions compared to more energy-efficient new construction”*. The document goes on to state that:

“Most climate scientists agree that action in the immediate timeframe is crucial to stave off the worst impacts of climate change. Reusing existing buildings can offer an important means of avoiding unnecessary carbon outlays and help communities achieve their carbon reduction goals in the near term”.

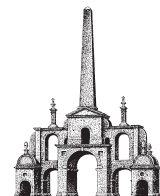
Inadequate emphasis on appropriate management of heritage assets

In addition to the role of heritage plays in sustainable development and as an “irreplaceable expression of the richness and diversity of our past”¹, the contribution of heritage to the economy is significant. Heritage and Ireland’s historic environment is estimated to account for €1.5 billion or 1% of the State’s Gross Value Added (GVA) and some 2% of overall employment (approximately 65,000 employment positions)². Achieving balanced economic development will be a core goal of the National Planning Framework and heritage can play a significant role in this.

While the Draft National Planning Framework does provide that *“Ireland’s built heritage assets are a non-renewable resource that merit being nurtured in a manner appropriate to their significance”*, the language in the Draft National Planning Framework with regard to the management of heritage assets is weak and the document does not expressly state that Ireland’s historic environment should be preserved,

1 *Architectural Heritage Protection Guidelines for Planning Authorities*, Department of Arts, Heritage and the Gaeltacht, 2011, at page 13.

2 Please see the Heritage Council’s 2011 publication *Economic Evaluation of the Historic Environment Ireland* for further details on the importance of heritage to the Irish economy.



conserved or protected. To the contrary, the Draft National Planning Framework does not advocate active protection of heritage assets, but discusses conservation largely in terms of a trickle down benefit of other policies for reuse (e.g. see the quote from page 87 of the Draft National Planning Framework referenced in the section above).

The Society is particularly troubled by the language used in National Policy Objective 21, which states that it is an objective to: *“facilitate the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism.”* [Emphasis added.] This National Policy Objective suggests the protection of natural landscape and built heritage is non-essential and a secondary consideration in developing the rural economy. It is essential that this objective be strengthened in this regard.

Overall, it is of crucial importance that consideration of heritage (including built heritage and historic landscape) is not side-lined, but is central to the new National Planning Framework. Perpetuating the view that built heritage is a constraint on development and failing to provide clear statements in spatial planning policy about the importance of appropriate management, preservation and protection of the historic environment is likely to frustrate the implementation of the adopted National Planning Framework. Moreover, failure to set out a clear and unequivocal statement regarding the protection and conservation of Ireland’s historic environment is likely to result in permanent damage to and loss of heritage assets.

National Planning Framework must be informed by the National Landscape Character Assessment

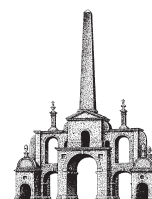
Much of Ireland’s most distinguished architectural heritage is to be found in its landscapes, whether it be National Monuments or protected structures, ecclesiastical buildings and ruins or country houses, whether grand or modest in scale. What is distinctive for all of these structures is their siting and setting. Furthermore, their associated lands and/or demesnes had been designed, elaborated, planted and inhabited to enhance the setting. Rivers, loughs, hills, magnificent valleys and mountains are all engaged and embraced whether as framed views or as elements within the designs.

The gardens and designed landscapes of the 17th through to the 19th century were extensions of the plan of the house, to be experienced through all the senses as one inhabited outside spaces or moved along walks or rides. House and landscape were often a single coherent design. Ancient monuments and sacred places along with ruins and churches have been engaged in a visual dialogue across the land with country houses and their designed landscapes, each renewing their importance and redefining their significance.

In the attendant landscapes of country houses, ancient woodlands have been greatly valued. Individual groups of trees, avenues, boundary zones and new woodlands have been planted for both utility and amenity value. They have created microclimates, providing shelter for buildings and productive land. They have heightened the experience of the setting, and they have composed views, framing significant natural and manmade features. Natural watercourses and features were augmented with man made versions for utility and beauty and water was managed for supply and productivity in a way that contributed to the landscape. These landscapes, large and small, along with the fields enclosed with walls or banks and planted with hedgerows that now contain mature trees, all coalesce to make collective creations of singular importance.

Woodlands, wooded valleys, boundary planting and hedge rows form important ecological corridors and networks, so important not only to maintain biodiversity but also in their contribution to carbon sequestering.

The final National Planning Framework will direct growth at a national level, including the necessary major strategic infrastructural development necessary to support that growth. Having regard for the potential for such development to result in impacts and cumulative impacts on sensitive landscapes, it is essential that any future spatial strategy for Ireland be informed by a detailed analysis of



Ireland's landscape in order to ensure that the final strategy can be implemented.

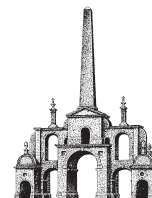
It is unclear how a robust spatial strategy for Ireland can be adopted in the absence of a comprehensive assessment of the national landscape character. The completion of the NIAH Survey of Historic Gardens and Designed Landscapes will also be of significant importance in determining preferred locations for major infrastructural development. This is particularly the case given that the Draft National Planning Framework directs that up to 60% of new housing development will take place outside of urban areas.

Other important initiatives relevant to the drafting and implementation of a new National Planning Framework

- *Creation of a database of assets of national and international heritage importance:* the existing system for the protection and management of Ireland's historic environment comprises a fractured and convoluted system implemented by means of multiple enactments, regulations and statutory guidelines. Numerous bodies hold responsibility for elements of architectural, archaeological and cultural heritage and these bodies pursue different approaches to the protection and management of structures, sites and landscapes of heritage importance. Information on assets of architectural, archaeological and cultural heritage importance have been assembled into a number of different resources (e.g. the National Inventory of Architectural Heritage, the Survey of Historic Gardens and Designed Landscapes; the Record of Monuments and Places; the Sites and Monuments Record; the list of National Monuments; county Records of Protected Structures; the UNESCO World Heritage List, etc). The existing system is opaque and difficult to navigate. Consideration could be given to collating a database of sites, monuments, buildings, gardens and landscape of national and international heritage importance. A number of these resources already identify the importance of architectural, archaeological and cultural heritage assets (i.e. identify whether an asset is of national or international importance). Such a database would have numerous benefits including:
 - (i) informing the drafting of the National Planning Framework by identifying areas of particular architectural, archaeological and cultural heritage sensitivity;
 - (ii) improving public engagement (including tourist engagement) with Ireland's historic environment; and
 - (iii) providing a clear and simple resource for developers and investors so as to promote certainty and help direct investment appropriately.

- *Resourcing:* Many relevant bodies, including local authorities and An Bord Pleanála, do not have a dedicated conservation officer or do not have adequate staff resources in terms of suitably qualified conservation professionals. This acts as a barrier to the effective implementation of national strategic planning policy for many reasons, including:
 - (i) Insufficient resources at local authority can be an impediment to developing planning policy at local level (i.e. in the statutory plan) to a sufficient level in order to provide adequate direction and certainty in relation to development within or in proximity to the historic environment or within historic landscapes;
 - (ii) In the absence of the expertise of a suitably qualified conservation professional, assets of architectural, archaeological and cultural heritage significance can go unidentified and can be lost or damaged due to be inappropriate, albeit well-meaning development; and
 - (iii) Lack of access to suitably qualified conservation professionals can cause significant delays in the adjudication of planning applications of all sizes, preventing issues related to the impact of development on assets of architectural, cultural and archaeological heritage being identified at an early stage during the planning process (e.g. at pre-planning consultation) and increasing the likelihood of appeal and, ultimately, refusal of permission on heritage grounds.

Given this, the Society submits that the National Planning Framework must include a clear objective that all consenting authorities and authorities with forward planning function (e.g. planning authorities, An Bord Pleanála, the Department of Culture, Heritage and the Gaeltacht, etc.) be adequately resourced with suitably qualified conservation professional.



Conclusion

The Society calls on the Government to demonstrate a clear commitment to the conservation and protection of Ireland's historic environment in the National Planning Framework. If we can be of any further assistance to this importance initiative, please not hesitate to contact us.

Yours faithfully,

Donough Cahill
Executive Director
Irish Georgian Society

