

AACO

Association of Architectural Conservation Officers
Cumann Oifigigh Chaomhnúcháin Ailtireachta

AACO Submission

to

Department of Housing, Planning, Community and Local Government

on

**Ireland 2040: Our Plan
Issues and Choices**

INTRODUCTION

The Association of Architectural Conservation Officers (AACO) is the representative organisation for professionals with architectural conservation expertise who have been appointed in a number of local authorities in Ireland to implement the provisions within the Planning and Development Acts that seek to protect, conserve and enhance the built heritage of Ireland. Among the various duties of the Architectural Conservation Officer is the assessment of the impact of projects, measures and policies on Protected Structures, buildings within Architectural Conservation Areas and on other elements of the historic building stock not specifically protected by statutory designations. The role of the members of AACO in individual local authorities and through its submissions as an association to various national and international bodies is to promote appropriate care and revitalisation of the historic building stock which forms an important part of Ireland's cultural heritage.

COMMENTS ON DISCUSSION DOCUMENT FOR 'IRELAND 2040 OUR PLAN: NATIONAL PLANNING FRAMEWORK – ISSUES AND CHOICES'

1. Purpose of the Discussion Document

The discussion document indicates on Page 4 some of the purposes of opening dialogue with interested parties and the Association of Architectural Conservation Officers are particularly interested in commenting as follows;

1.1.1b As it is intended that the Ireland 2040 Plan will be a high-level document that will provide the framework for future development and will be the overall Plan from which other, more detailed plans will take their lead, such as city and county development plans and regional strategies we think that it is important that the NPF provides for policies that support and assist appropriate sensitive re-use of historic buildings. It is important that our existing built heritage in cities, towns and villages are valued as assets from the outset.

1.1.2 & 1.1.3 AACO support the inclusion of architectural heritage advisers from The Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs in developing the NPF as this will be particularly relevant where there is a long term and place-based aspect to public policy and investment, particularly in areas such as housing, jobs, transport, education, health, environment, energy and communications. We support the development of a new Government Policy on Architecture in tandem with the NPF as the previous Government Policy on Architecture 2009-2015 addressed architectural heritage in a comprehensive way. Policies and financial incentives that promote the re-use of architectural heritage will impact on most aspects of the National Planning Framework. This will contribute to national development goals, including improved living standards, quality of life, prosperity, competitiveness and environmental sustainability, to be more broadly considered.

1.1.4 The National Planning Framework must provide for more effective regional development by supporting architectural conservation in the centre of existing towns and villages.

Ireland has ratified several European and international conventions in relation to the protection of its cultural heritage. UNESCO's Convention Concerning the Protection of the World Cultural and Natural Heritage defines cultural heritage.¹

¹ <http://whc.unesco.org/en/conventiontext/> 'as monuments: architectural works...and combinations of features, which are of outstanding universal value from the point of view of history, art or science; [...] and areas including archaeological sites which are of outstanding universal value from the historical, aesthetic, ethnological or anthropological point of view.'

Architectural works are also classified as cultural heritage as are 'groups of buildings: groups of separate or connected buildings which, because of their architecture, homogeneity or their place in the landscape, are of outstanding universal value from the point of view of history, art or science; sites: works of man or the combined works of nature and man.'²

The Burra Charter noted that cultural significance is 'embodied in the place itself, its fabric, setting, use, associations, meanings, records, related places and related objects. It notes that places of cultural significance enrich peoples' lives, providing a deep inspirational sense of connection to community & landscape, to the past and to lived experiences while reflecting the diversity of communities. It provides guidance for the conservation and management of places of cultural significance.'³

Cultural Heritage consists of both tangible physical artefacts or structures and intangible traditions or practices inherited from our ancestors that are valued and protected by society in order to pass these onto future generations. UNESCO (United Nations Educational, Scientific and Cultural Organisation) first defined the cultural heritage in its *Convention Concerning the Protection of the World Cultural and Natural Heritage* (1972) as monuments, man-made sites or groups of buildings of outstanding universal value.

Article 1

For the purposes of this Convention, the following shall be considered as "cultural heritage":

monuments: *architectural works, works of monumental sculpture and painting, elements or structures of an archaeological nature, inscriptions, cave dwellings and combinations of features, which are of outstanding universal value from the point of view of history, art or science;*

groups of buildings: *groups of separate or connected buildings which, because of their architecture, their homogeneity or their place in the landscape, are of outstanding universal value from the point of view of history, art or science;*

sites: *works of man or the combined works of nature and man, and areas including archaeological sites which are of outstanding universal value from the historical, aesthetic, ethnological or anthropological point of view.*

International conventions ratified by Ireland also recognize 'the quality of the built environment and architecture [and] demonstrate the unity of cultural heritage and the links that exist between architecture, the arts, popular traditions and ways of life'⁴

In 2003 UNESCO through the *Convention for the Safeguarding of the Intangible Cultural Heritage* expanded the definition of cultural heritage to include the practices, representations, expressions, as well as the knowledge and skills (including instruments, objects, artefacts, cultural spaces), that

² <http://whc.unesco.org/en/conventiontext/>

³ <http://australia.icomos.org/publications/charters/> The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance 1999.

⁴ Council of Europe Convention of the Protection of Architectural Heritage of Europe 1985

communities, groups and, in some cases, individuals recognise as part of their cultural heritage. The areas of intangible cultural heritage were identified as:

- Oral traditions and expressions, including language as a vehicle of the intangible cultural heritage;
- Performing arts;
- Social practices, rituals and festive events;
- Knowledge and practices concerning nature and the universe;
- Traditional craftsmanship.

It is also important that the full extent of the range of buildings and structures that form our cultural heritage is understood as it is more than the cultural institutions where the arts are housed or performed e.g. museums, libraries, archives, galleries and theatres. It is our historic houses, vernacular buildings, places of worship, civic structures, industrial complexes, institutional campuses, places of business, transportation infrastructure, castles, monuments, burial sites, fortifications, etc. The framework and associated assessment documents should seek policies to address the dereliction and lack of funding for the maintenance and support of our historic building stock or the removal and loss of archaeological sites and features.

RECOMMENDATION: The NPF should include objectives to support and assist appropriate sensitive re-use of historic buildings and places. Policies to support these objectives should acknowledge the need to properly resource local authorities with suitably qualified staff and provide fiscal incentives to achieve these goals.

2. Integrated Place-Based Strategies

Ireland has ratified several European and international conventions in relation to the protection of its cultural heritage. UNESCO's Convention Concerning the Protection of the World Cultural and Natural Heritage defines cultural heritage.⁵

Architectural works are also classified as cultural heritage as are 'groups of buildings: groups of separate or connected buildings which, because of their architecture, homogeneity or their place in the landscape, are of outstanding universal value from the point of view of history, art or science; sites: works of man or the combined works of nature and man.'⁶

4.3.19 notes that 'The National Planning Framework will seek to address urban-generated development ... and promote the development of integrated place-based strategies for rural-urban hinterlands. Our built heritage and landscape form part of these unique and distinctive assets and tourism in the context of opportunities arising and includes urban areas, rural towns and villages.

RECOMMENDATION: The NPF should include objectives to support integrated place-based strategies. Policies to support these objectives should acknowledge the need to properly resource local authorities with suitably qualified staff and provide fiscal incentives to achieve these goals.

⁵ <http://whc.unesco.org/en/conventiontext/> 'as monuments: architectural works...and combinations of features, which are of outstanding universal value from the point of view of history, art or science; [...] and areas including archaeological sites which are of outstanding universal value from the historical, aesthetic, ethnological or anthropological point of view.'

⁶ <http://whc.unesco.org/en/conventiontext/>

3. Heritage and Landscape

The AACO support the view outlined in 5.4.1 that the NPF is an opportunity to refocus on the sustainable and adaptive re-use of our historic assets and regenerate existing areas. Various research documents both nationally and internationally outline the benefits of this approach. There are many good examples of this adaptive re-use in Ireland. Successful interventions in other regions such as the ‘Halland Model’ which is well documented provide guidance on how these objectives have been achieved. Historic designed landscapes are an important part of our heritage and have the potential to be sensitively conserved, with support from financial incentives. Likewise it is important to promote the conservation of the built assets of our maritime heritage as they are an authentic element of our shared culture.

RECOMMENDATION: The NPF should support policies for the adoption of successful models and fiscal incentives for the conservation of our built heritage, designed landscapes and maritime heritage.

4. Acknowledge Role of Local Authorities

The role of the Architectural Conservation Officer in the protection, promotion and safeguarding of our shared cultural heritage is important. Within each local authority there are numerous offices and sections that deliver cultural programmes or safeguard the cultural heritage of the local area. Local authorities have been instrumental in promoting the re-use of historic structures for use as museums, local theatres, libraries and community centres that provide space for the creative arts or cultural events and for tourists. Without the involvement and financial input from local authorities there would be significant gaps in the provision and support of cultural activities and artists at local level. The acknowledgement of the importance of the local authority’s role and support for the sustainable re-use of existing built heritage needs to be a central part of any National Planning Framework.

The first Culture Summit of the international organization United Cities and Local Governments (UCLG), municipal and local government representatives adopted Culture 21: Actions. One of the aims of this document is to highlight the interdependent relationship between citizenship, culture, and sustainable development and to harness the role of cities and local governments as authorities in the development and implementation of policies with, and for, citizens.

The document recognizes that local cultural policies should take into account heritage and policies regarding the protection of cultural heritage in all its dimensions, both tangible and intangible.

The document also acknowledges that places are the result of interaction between humans and their environment, and that a territory is a bearer of history and meaning, and is, therefore, cultural. This cultural dimension is made up of the practices and customs of citizens: Heritage, architecture, design, public art, landscapes, the shaping of the natural environment and the organization of space.

RECOMMENDATION: Role of Local Government in promotion, delivery and safeguarding of our cultural heritage needs to be recognised and supported. The development of relationships between different stakeholders within local authorities should be advanced through policy documents.

4. Support Joint Projects & Development of Relationships between Key Stakeholders

In the past cultural projects or programmes were often developed to meet the requirements of a specific client or agency without examining how they could be tailored or presented so that there might be multiple benefits to different groups or sectors. The National Planning Framework should encourage stakeholders to examine how to form relationships to enable projects to be developed that will deliver outcomes that benefit a range of different interests.

Loughshinny Boathouse, in the ownership of Fingal County Council was repaired and renovated by staff who developed traditional building skills during the work. The boathouse is used as a shared space of an Artist in Residence studio and a base in summer for the lifeguards patrolling the adjoining beach. The local community benefitted from the visual improvement and increased activity on the site and from interaction with the artists using the space.

Swinford Cultural Centre, in the ownership of Mayo County Council was a former Railway Good Shed that was once a derelict structure in a central location. The conservation of the building allowed for sustainable development in the town and has provided for multiple uses as a market place, concert venue, exhibition space and for community use.

Many redundant buildings are in the centre of towns or villages and policies that support the re-use of existing structures deal with issues of dereliction by conserving historic structures that can provide for housing, arts, heritage and community use while developing traditional building skills that could be used on other sites.

RECOMMENDATION: Encourage the development or strengthening of relationships within or between different stakeholders and governmental departments to achieve shared goals.

5. Development of Cultural Tourism Projects

Cultural Tourism is a key emerging sector in the Tourism Industry and the development of inclusive and engaging cultural tourism projects is something the National Planning Framework should support. Ireland's architectural heritage is a key component of the Irish identity and what the country has to offer to both domestic and foreign visitors. The built heritage has influenced the arts for generations in paintings, poetry and literature, as well as forming the backdrop in numerous film and television productions. While many of our grander architectural gems specifically attract tourists as they house cultural institutions or visitor attractions, the boarder tourism role that architectural heritage plays is often unrecognised. Many of our older buildings are places people live, use and work in on a daily basis. They are schools, hospitals, pubs, shops, railway stations, garda stations, libraries, courts, churches and homes. They are the buildings that make up a large part of the centres of our cities, towns and villages, as well as rural farm complexes and historic rural estates. These structures create the special character of a place through pleasant streetscapes, public realm spaces or their historic setting in the landscape that is attractive to both the inhabitants of the place and to tourists.

AACO believes it is important that the development of cultural tourism products extends beyond the bigger one-site projects and looks to area-based initiatives that allow tourists experience the lifestyle and interact with local communities. Fáilte Ireland's Merrion Square Initiative demonstrated the willingness and desire of different stakeholders to engage and collaborate together to open up the buildings of this Georgian square to visitors and also to each other. This type of cultural tourism

product should be supported and advanced. Consultation with AACO could help identify potential historic areas or places around the country and their expertise in architectural conservation would help guarantee that the product offered was authentic and sensitive to the significance and the historic fabric of the place. An example of a potential cultural tourism project is Aungier Street in Dublin city centre where research and survey work carried out by the Dublin City Conservation Officer can be utilised to inform visitors of the survival of rare and early buildings on the street and also build on the unique fact that the heart of St. Valentine is located there. The linking of cultural sites with shared themes or associations to create trails is another potential way to develop a cultural tourism product.

RECOMMENDATION: Support the development of Cultural Tourism Products that link people, sites and local communities and promote the re-use of the existing building stock.

7. Funding and Resources

It is essential that policies arising out of the National Planning Framework provide funding mechanisms for the sensitive re-use of our architectural heritage which is not adequately funded at present. Increased recruitment at local authority level in this specialist area is required to deliver policies to ensure best conservation practice in the re-use of our historic structures and the enhancement of our historic urban cores.

Due to the diverse and complex nature of the structures and buildings that make up Ireland's architectural cultural heritage, the variety of uses that apply, and the different nature of owners or occupiers no one solution will answer the different financial resourcing requirements that exist. Proposed measures should be adaptable to different scenarios in order that they are of real benefit to the architectural heritage they seek to safeguard. Therefore a collection of alternative stimuli are required. While there is a role for funding on a national level for key buildings it is an essential requirement that some forms of fiscal incentive or aid must be operated at local level. There must be local ownership and the local authority, which is tasked with the proper planning and development of its area, is best placed to do this.

Creation of National Cultural Heritage Fund – In the UK a Heritage Lottery Fund operates where work has been carried out: to save Buildings at Risk; to regenerate historic town centres through the Townscape Heritage Initiative programme; to provide much-needed facilities for communities; to establish volunteering opportunities in building conversation. This fund has been incredibly successful in the UK with a high public profile. The opportunity for a similar scheme in Ireland is not possible for the present as the renewal of the National Lottery licence has only recently been re-negotiated but the national government should examine this when the licence comes up for renewal in the future and also if there are other opportunities to create a national fund that could assist cultural heritage projects.

Taxation – Taxation provisions can be used to encourage investment or direct revenue into a specific area. In relation to the architectural cultural heritage, taxation initiatives could help to reduce costs of conservation works, to prevent demolition, or to encourage sponsorship and donations to heritage foundations or organisations. Tax incentives though will not be beneficial or suitable to every owner such as charitable organisations or low income earners so measures other than tax breaks may need to be considered. Existing tax relief for heritage properties in Ireland is provided by Section 482 of the Taxes Consolidation Act but this requires a property to be open to the general public for a set number of days each year if it is of special interest. Many private home owners may not find the public access requirement desirable. A Living Cities Scheme Initiative has recently been

established which is a scheme of property tax incentives for certain 'special regeneration areas' in the centres of Dublin, Cork, Limerick, Galway, Waterford and Kilkenny. The scheme provides for tax relief for qualifying expenditure incurred on both residential and certain commercial refurbishment and conversion work. However, some concerns have been expressed in relation to the restrictions and limitations of the scheme.

Other taxation measures that could be considered are Tax Relief (through complete waivers or partial deductions) or Tax Credits. Options that could work for the architectural heritage are: zero or reduced rate of VAT for conservation works; income tax relief for maintenance works to Protected Structure; mortgage relief for conservation or maintenance works; waiver or reduction of property tax for owners of Protected Structures; capital allowances for commercial properties (e.g. in Northern Ireland - Business Premises Renovation Allowance or Living Over the Shop Allowance). Another option is not to provide exemptions or reliefs but to collect the revenue and apportion a percentage of the tax for a specific purpose. Consideration could be given to using a portion of the property tax for works that improve or conserve historic towns, streets, or historic buildings with public access so that there is a visible enhancement and payback to the local community.

RECOMMENDATION: A suite of different financial measures and incentives are needed to support re-use of historic structures. The adequate resourcing of staff in this sector also needs to be supported.

7. Re-use of Architectural Heritage

AACO would perceive that the use and development of historic buildings and structures could be central to developing relationships between the key stakeholders and expanding the reach of the beneficial outcomes of cultural projects. The National Planning Framework should therefore encourage the utilisation of our existing historic building stock. Architecture is recognised as a creative industry. Architectural conservation seeks to ensure that the places and structures created in the past by architects, craftsmen or others in our cities, towns, villages and countryside is allowed to continue to contribute to the everyday culture of the country. The sustainable re-use of existing buildings and the regeneration of urban centres is a cultural product which supports the wellbeing of citizens and visitors alike. A key statement in the Government Policy on Architecture 2009-2015 (GPA 2009-2015) notes and an 'objective with regard to the production of a sustainable built environment is that the value of the existing built environment as a resource for the future is recognized and exploited.' GPA 2009-2015 is an important document and Actions 16-19 address built heritage in a comprehensive manner. Subject to protecting its cultural value, continuing use of the existing built stock should be an important objective in both publicly and privately led development.

RECOMMENDATION: Utilise, adapt and extend existing buildings and facilities in preference to new build on a new site. The NPF and housing policy should prioritise the re-use of existing buildings in towns and villages rather than group housing schemes on the edge of towns. The potential for our city, town and village centres to provide as sustainable solution to the housing crisis should be highlighted as it addresses dereliction and reduces car dependence. Governmental Departments seeking facilities at local level should investigate the potential of historic built stock as the first option prior to pursuing new build proposals. Provision for flexibility in Building Control for historic structures need to be addressed.

8. Supporting traditional skills sets

Research has provided evidence and background information on construction skills deficits and training needs for building conservation.⁵ These crafts are important skills, which require training and accreditation if we are to ensure the continuity of these trades, the conservation of historic structures and innovation in the design and execution of this work. Other research including a report, Traditional Building Craft Skills: Ireland 2009, commissioned by the National Heritage Training Group and funded by CITB-Northern Ireland, the Northern Ireland Environment Agency, The Office of Public Works, Fáis and Construction Skills provides statistical data on traditional crafts skills in Ireland. This analysis of the built heritage sector contributes to understanding the place of traditional buildings in the culture of Ireland.

In 2014, The Department of Arts, Heritage and the Gaeltacht funded a pilot programme entitled “Traditional Building Skills Training Scheme” to support education and training in certain traditional construction methods and materials that are necessary for architectural conservation. The Department approached Conservation Officers in local authorities and the scheme was adopted in Fingal, Galway and Kilkenny County Council. The training projects focused on particular sites with the education model focused on the specific requirements of each site and so dealt with traditional joinery and carpentry skills or masonry and plaster repairs. The scheme was successful in facilitating the upskilling of accredited and unaccredited crafts persons in conservation skills and demonstrated both a demand and a need for this type of training.

RECOMMENDATION: Review the support structures for traditional crafts practitioners.
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CONCLUSION

AACO is eager to contribute and support the development and implementation of the National Planning Framework and we would ask that the conservation of our architectural heritage is integral to the framework.

⁵ The Heritage Council 2015, *Research on the Irish labour market in construction conservation, Volume 1 & 2*