



National Policy on Architecture  
Room 1.08  
Department of Culture, Heritage and the Gaeltacht  
Custom House  
Dublin  
D01 W6X0

25th March 2020

### Re. Submission on National Policy on Architecture

The Irish Georgian Society welcomes this opportunity to comment on the discussion document for the National Policy on Architecture and how this could “support the country’s projected growth and guide its sustainable development over the coming years”.

Conservation of our built heritage should form one of the foundational principles of the National Policy on Architecture and thereby support a framework within which policies promoting innovation and high standards of modern design can be achieved. As such, the Irish Georgian Society supports the ambition of the discussion document to “demand sensitive reuse of our existing built environment resources as well as high quality, sustainable new buildings, places and spaces that reflect our values” (p. 2).

This submission draws on a paper previously submitted by the Irish Georgian Society for the Heritage Ireland 2030 public consultation process (February 2019) with further observations drawn from participation by representatives of the Society’s planning committee in workshops convened by the Heritage Council and by ICOMOS. It identifies objectives relating to the financial and regulatory environments, and to communities and education that could be considered in developing the National Policy on Architecture.

### Financial environment objectives

- Respond to the resolution agreed following the Irish Georgian Society conference Taken for Granted: Spending to save Ireland's architectural heritage (22nd November 2018) which emphasised:
  - o a need to increase funding for the government’s conservation grants schemes (Built Heritage Investment Scheme and the Historic Structures Fund) so as to ensure conservation projects are adequately funded
  - o a need to review the structure of government conservation grants schemes to allow greater flexibility in spending of funds and a more structured approach to the allocation of funds;
- Fully implement the stated goal of Investing in our Culture, Language & Heritage 2018-2027 to support the Built Heritage Investment Scheme and the Historic Structures Fund. This recognises the role these grants play in helping “the owners and custodians of our heritage buildings to protect our valuable built heritage and ensure that vital traditional building skills are not lost” (p. 55).

- Explore means of increasing the adoption of the Living City Initiative scheme so as to facilitate conservation works and to regenerate and revitalise urban areas.

## **Regulatory environment objectives**

- The conservation of our built heritage should be considered on par with competing policy pressures of meeting housing targets, supporting economic development and delivering key infrastructure projects. The Irish Georgian Society is concerned that Specific Planning Policy Requirements (SPPRs) promoting taller buildings and higher densities are currently being given precedence over conservation policies. As such the Society considers it vital that a national policy on architecture includes objectives to introduce conservation-centric SPPRs that seek to safeguard our built heritage.
- A national policy on architecture should promote innovative, modern architectural design of the highest quality at the level of individual new buildings and in terms of city planning and urban design. In doing so it should also consider context and ensure that neighbouring buildings of significant architectural and heritage interest are given sufficient room and respect so as to preserve their character and setting.
- Additional support should be provided for the implementation of Part IV of the Planning and Development Act 2000 notably for all local authorities to appoint conservation officers and conservation architects to be champions, at a local level, to both implement architectural heritage policy and to promote good design and quality in new architecture in historic cities, towns, and villages.
- In a wider context, there is a pressing need for greater architectural and conservation expertise to be provided in the planning process, both at local authority level and on An Bord Pleanála. It is understood that approval is still pending of the review of Part IV of the Planning Act which was prepared over a number of years by experts in the practice of architectural heritage protection. This contains recommendations that are very badly needed in order to make the legislation work more effectively and so should be a priority objective.
- Adequate resourcing is also required for the effective enforcement of conservation legislation where necessary. The destruction of Vernon Mount in Cork in 2016 as a result of vandalism and fire, notwithstanding numerous warnings from several interest groups over a period of years, provides only one example of deficiencies within the current system.
- New policies and actions are required to direct resources to safeguard buildings which are most at risk of loss of significance through decay, abandonment and potentially damaging development. As part of this process, consideration should be given to policies for indirect actions on buildings at risk, such as the development of a national buildings at risk register. A further option could be the establishment of a buildings at risk fund, which could be accessed by local authorities for the purposes of undertaking emergency stabilisation works (those costs to be recouped from the owner) or for the purposes of compulsorily purchasing buildings at risk.
- Consideration should be given to objective 17 in the National Planning Framework which aims to *“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”.*

- Measures should be explored to ensure local authorities fully adopt recommendations by the Minister for additions to the Record of Protected Structure (i.e. under the National Inventory of Architectural Heritage).

### **Community objectives**

- Ensure adequate resources are provided to Heritage Officers to ensure their effective engagement and communication with local communities. Consideration should be given to requiring the development of Heritage Plans for all local authority areas.
- Engage with NGOs such as the Irish Georgian Society in delivering awareness generating initiatives that involve local communities e.g. traditional building skills exhibitions.

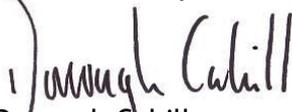
### **Education objectives**

- Support could be given to NGOs such as the Irish Georgian Society in delivering conservation related CPD accredited educational and training programmes for conservation professionals and practitioners, and for protected structure owners and guardians.
- Opportunities could be sought to partner with NGOs like the Irish Georgian Society in raising a broader awareness and an understanding of our built heritage and its conservation needs.
- The viability of a national centre for traditional building skills could be explored through the National Policy on Architecture. Traditional building skills are under threat and action is required to ensure that suitably qualified professionals are available in Ireland to undertake necessary repairs and maintenance to buildings of architectural heritage value.

### **Conclusion**

The development of a new National Policy on Architecture is strongly supported by the Irish Georgian Society. It is hoped that due consideration will be given to the objectives proposed in this submission relating to the financial and regulatory environments, and to community and education and we would welcome an opportunity to contribute further to the process if required.

Yours sincerely,

  
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