



**An Roinn Turasóireachta, Cultúir,
Ealaíon, Gaeltachta, Spóirt agus Meán**
Department of Tourism, Culture,
Arts, Gaeltacht, Sport and Media

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Draft Longford County Development Plan 2021 – 2027

A chara

I refer to correspondence to the Department of Culture, Heritage and the Gaeltacht on 27th October, 2020 received in connection with the above.

Outlined below are heritage-related observations/recommendations co-ordinated by the Development Applications Unit under the stated headings.

Archaeology

The National Monuments Acts 1930 to 2014

The specific national legislative code for protection of monuments, historic wrecks and archaeological objects is the National Monuments Acts 1930 to 2014. In summary, this provides legal protection for all archaeological objects, wrecks 100 or more years old and for a range of categories of monuments and places. Archaeological objects (which in broad terms includes all moveable objects of archaeological importance) are comprehensively protected under the National Monuments Acts.

In terms of protection of monuments and related sites, the most widely applicable protective mechanism is the Record of Monuments and Places (RMP), established under section 12 of the National Monuments (Amendment) Act 1994. There are over 130,000 entries in the RMP, which takes the form of lists and maps for each county in the State. Copies of these lists and maps, as prepared in the 1990s, were circulated to all planning authorities and are now available in PDF format at www.archaeology.ie. The RMP includes the archaeological monuments which had been identified at the time it was issued. Of course, many more

Aonad na nIarratas ar Fhorbairt

Development Applications Unit

Oifigí an Rialtais

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archaeological monuments have been identified since and, while these have not as yet been included in the RMP, an online database of known archaeological monuments (including current RMP entries and ones which will be included in a revised RMP) is available as the Historic Environment Viewer, which can be accessed at www.archaeology.ie.

The RMP requires notice to be given to the Minister for Housing, Local Government and Heritage of proposed work at or in relation to monuments and places included in it (generally referred to as “recorded monuments”). Similar protection is provided by the Register of Historic Monuments (established under section 5 of the National Monuments (Amendment) Act 1987) to historic monuments and archaeological areas included in it. The relevant Notification Form can be found at www.archaeology.ie.

The strongest legal protection under the National Monuments Acts in respect of monuments is afforded to national monuments of which the Minister for Housing, Local Government and Heritage or a local authority is owner or guardian or in respect of which a Preservation Order under the National Monuments Acts is in force. The consent of the Minister is required for interference with such national monuments or ground disturbance around or in proximity to them. A national monument is any monument the preservation of which is a matter of national importance by reason of the archaeological, architectural, historical, traditional or artistic interest attaching to it. A list of Preservation Orders currently in force can be found at www.archaeology.ie.

Under the National Monuments Acts the Minister and local authorities must maintain national monuments of which they are owners or guardians (the OPW has day to day responsibility in relation to national monuments owned by or in guardianship of the Minister for Housing, Local Government and Heritage) and, subject to such restrictions as are reasonably necessary, seek to provide public access to such national monuments.

All wrecks over 100 years old (whether previously known or just discovered) and all archaeological objects situated underwater, are protected under [section 3](#) of the [National Monuments \(Amendment\) Act 1987](#). Wrecks of any date and the potential location of wrecks or archaeological objects may also be protected under Section 3 of the 1987 (Amendment) Act by the making of an underwater heritage order, if considered to be of sufficient historical, archaeological or artistic importance to merit such protection. Information on known wrecks can be found in the Department’s [Wreck Viewer](#) which holds records of over 18,000 known and potential wreck sites in Irish waters.

The National Monuments Act also regulates the use of detection devices (Section 2) and diving on protected wreck sites or for archaeological purposes (section 3), with licences being required for both. Further information on this is available from www.archaeology.ie

The Planning and Development Act 2000 and the Planning and Development Regulations 2001

Development Plans are legally required to contain objectives for the conservation and protection of the archaeological heritage (see section 10(2)(c) of the Planning and Development Act 2000). This is separate and additional to mandatory objectives in relation to architectural heritage.



The Planning and Development Acts and Regulations contain further provisions relating to the protection of archaeological heritage in the course of particular planning cases. These include provisions making it clear that imposition of archaeological conditions on grants of planning permission does not create grounds for claims for compensation. Detailed provisions are also included, which ensure that planning applications for proposed development which would affect sites protected under the National Monuments Acts 1930 to 2014 or archaeological sites in general, are referred to the National Monuments Service.

The Environmental Impact Assessment Directive

The EU Directive on EIA (which is given effect to in Irish law through a range of national legislation) clearly requires that EIA include consideration of impact on archaeological heritage.

International Conventions

Ireland is a party to the 1992 Council of Europe European Convention on the Protection of the Archaeological Heritage (the “Valletta Convention”). A particular focus of the Valletta Convention is the requirement to ensure that archaeological considerations are integrated into the planning and development process. It is important that all public bodies, including local authorities, ensure that Ireland is at all times in compliance with this binding international treaty, by using domestic legislation, such as the Planning and Development Act, to give effect to the requirements of the Convention.

Although not as yet a party to the 2001 UNESCO Convention on the Protection of the Underwater Cultural Heritage, Ireland supported its adoption and has since then consistently supported its aims and objectives. It is essential that full account is taken of the need to provide appropriate protection for the underwater cultural heritage.

Re:11.4.2 Framework and Principles for the protection of Archaeological Heritage.

National policy on protection of the archaeological heritage in the course of development - Framework and Principles for the Protection of the Archaeological Heritage

The *Framework and Principles for the Protection of the Archaeological Heritage* (Government of Ireland 1999) was published so as to promote a high level of compliance with the aims and requirements of the Valletta Convention. It sets out national policy on the protection of archaeological heritage in the course of development.

While not specifically directed at the planning system, as operating under the Planning and Development Acts, it speaks to all development control codes. It is therefore essential that archaeological issues be addressed as part of Development Plans, as such plans sit at the centre of the whole planning and development system.

Core elements of the policies set out in the *Framework and Principles* document include emphasis on the non-renewable nature of the archaeological heritage and the need always



to consider its preservation *in-situ* as the first option, and also the need to carry out appropriate levels and forms of archaeological assessment in advance of development.

Recommended over-arching objective for the protection of the archaeological heritage

It will be an objective of the planning authority to protect in an appropriate manner all elements of the archaeological heritage and other features of the following categories:

- (a) Sites and monuments included in the Sites and Monuments Record (SMR) as maintained by the National Monuments Service (NMS) of the Department of Housing, Local Government and Heritage (DHLGH).
- (b) Monuments and places included in the Record of Monuments and Places (RMP) as established under section 12 of the National Monuments (Amendment) Act 1994.
- (c) Historic monuments and archaeological areas included in the Register of Historic Monuments as established under section 5 of the National Monuments (Amendment) Act 1987.
- (d) National monuments subject to Preservation Orders under the National Monuments Acts 1930 to 2014 and national monuments which are in the ownership or guardianship of the Minister for Housing, Local Government and Heritage or a local authority.
- (e) Archaeological objects within the meaning of the National Monuments Acts.
- (f) Wrecks protected under the National Monuments Acts 1930 to 2014 or otherwise included in the Wreck Viewer maintained by the National Monuments Service of the Department of Housing, Local Government and Heritage.
- (g) Archaeological features not as yet identified but which may be impacted on by development.

In securing such protection, both generally and in the context of any particular planning decision, the planning authority shall take full account of, and be guided by, national policy on the protection of the archaeological heritage as set out in the *Framework and Principles for the Protection of the Archaeological Heritage* (Government of Ireland 1999). Any specific recommendations made by the Government Minister responsible for the protection of the archaeological heritage, as a statutory consultee in the planning process, shall be given full consideration by the planning authority.

The planning authority shall protect the archaeological heritage through ensuring preservation *in-situ* or preservation by record, as appropriate, with preservation *in-situ* being the first option to be considered and being presumed to be the preferred option. If preservation *in-situ* cannot be achieved, or can only be achieved in-part, then preservation by record of the archaeological heritage will be required – this will require the full archaeological excavation and recording of the monument/site, in accordance with best professional practice. Where excavation is required this shall also include the preparation of appropriate reports, post-excavation analyses and publications. The costs of assessing



and mitigating archaeological impacts will be considered to be part of development costs which are appropriate to be borne by the developer.

RE: 11.8 Financial support for Built Heritage and National Monuments assets.

Details of the Community Monuments Fund, as described below, might be added in this section.

The Community Monuments Fund was established under the Jobs Stimulus Package and launched in July 2020. The fund is administered by the Department of Housing, Local Government and Heritage through the Local Authorities.

The main aims of the Community Monuments Fund are the conservation, maintenance, protection and promotion of local monuments and historic sites. It has a number of funding streams aimed at enabling conservation works to be carried out on monuments which are deemed to be significant and in need of urgent support, encouraging access to monuments and improve their presentation and also to build resilience in monuments to enable them to withstand the effects of climate change.

The Community Monuments Fund provides capital funding for projects involving:

1. Monuments that are included in the Record of Monuments and Places (RMP) under the National Monuments Act 1930 (as amended).
2. Monuments included in the Sites and Monuments Record (SMR) as compiled by the National Monuments Service.

Eligible projects were drawn from the following categories:

- a) projects proposed by a Local Authority in relation to monuments in public ownership where a clear heritage focus and community or public benefit has been demonstrated;
- b) projects proposed by a Local Authority on foot of applications from private applicants who are the owners or custodians of monuments;
- c) Relevant projects identified within County Heritage Plans.

Local Authorities could submit applications for works to monuments in public ownership directly to the Department. Private applicants or community groups, who are the owners or custodians of monuments, were asked to submit applications through their Local Authorities.

RE: 11.9 Archaeological Heritage

Archaeology is the study of past societies through their material remains and the evidence of their environment. It is not restricted solely to ancient periods; it includes the study of relatively recent societies through, for example, industrial and military sites.

Archaeological heritage is comprised of all material remains of past societies with the potential to add to our knowledge of such societies. It therefore includes the remains of features such as settlements, monuments, burials, ships and boats and portable objects of



all kinds, from the everyday to the very special. It also includes evidence of the environment in which those societies lived.

Archaeological heritage occurs in all environments, urban and rural, upland and lowland, grassland, tillage and forestry, inland and coastal, dryland, wetland (including peatlands) and underwater (including watercourses, lakes and the sea).

Archaeological heritage may exist in the form of upstanding or visible remains, or as subsurface features with no surface presentation.

Given the above, archaeological heritage can be present, albeit in some cases as yet undiscovered, in all environments.

RE: Archaeological Heritage Policy- County Policy Objectives.

Recommended policies to protect archaeological heritage

- To protect and enhance archaeological monuments and historic wrecks and their settings and amenities, having particular regard to the importance of historic town defences, historic graveyards, national monuments in the ownership of the Minister for Housing, Local Government and Heritage or a local authority and, in general, monuments and historic wrecks which, through their presence in the landscape or seascape, provide tangible evidence of the past.
- To protect historic graveyards, including through the avoidance of extensions to them that would have an inappropriate level of impact on sub-surface archaeological remains or on their setting or amenity and, in that regard, as an alternative to extensions to historic graveyards to endeavour to find alternative locations where additional land for burial is considered necessary.
- To ensure that historic graveyards in the ownership or care of the local authority are managed and maintained in accordance with appropriate conservation standards and that local communities involved in care and maintenance of historic graveyards receive appropriate advice regarding such standards.
- To promote and facilitate appropriate forms of access (including disabled access) to archaeological monuments and historic wrecks, including maintaining or developing means of access (by working with landowners to secure appropriate access over private lands), providing appropriate, accurate signage and interpretive material and providing appropriate forms of virtual access where physical access is not possible.
- To ensure that all aspects of archaeological heritage and underwater cultural heritage, in all environments, are considered in the development process, including impacts on unidentified elements of the archaeological and underwater cultural heritage.
- To promote knowledge and appreciation of archaeological and underwater cultural heritage and facilitate access to appropriate guidance regarding its protection and conservation, including at all stages of the development process (including pre-planning application consultations).
- To promote early and comprehensive public access to the results of archaeological excavations carried out as a result of development or conservation projects through



publications and the provision of on-site interpretive material even where no physical remains are visible.

- To support community initiatives and projects regarding preservation, presentation and access to archaeological heritage and underwater cultural heritage, provided such are compatible with appropriate conservation policies and standards, having regard to the guidance and advice of the Department of Housing, Local Government and Heritage.

RE: 16.4.21.3 Development Management Standards Archaeology.

General recommendation regarding development control policies and objectives

If the archaeological heritage of Co. Longford is to be effectively protected through the planning and development process, it is essential that all relevant and appropriate archaeological procedures and practices are followed. Adherence to the relevant procedures for planning referral under the Planning and Development Regulations is, of course, essential but a range of further policies and objectives for consideration for inclusion in the Development are set out below.

Ensuring that both the relevant statutory procedures and the other procedures and practices noted below are adhered to will be greatly facilitated by the planning authority having access to its own professional archaeological expertise.

With regard to developers seeking advice from the National Monuments Service (through the central contact point for heritage referrals from planning authorities in advance of submitting a planning application) the National Monuments Service (subject to available resources) will seek to engage with the pre-planning process. However, for the exercise to be beneficial, it is essential that developers carry out an initial archaeological assessment prior to engagement with the National Monuments Service. Planning authorities should emphasise this to developers before advising them to seek pre-planning consultation with the National Monuments Service.

Recommended Development Control Objectives and Policies:

- That proposed developments which may, due to their location, size, or nature, have implications for elements of the archaeological heritage (including underwater cultural heritage) be subject to an archaeological assessment, which should in general be carried out before any grant of permission. Such developments include those that are located at or close to archaeological sites or monuments or historic wrecks, those which are extensive in terms of area (ground disturbance of 1/2 hectare or more) or length (1km or more) even if no known elements of the archaeological heritage are present, those which would affect significant areas of environments such as wetlands, reclaimed areas of rivers, lakes and coastlines and underwater areas even if no known elements of the archaeological heritage are present, and any developments that require the carrying out of Environmental Impact Assessment.
- Proposed developments in areas of the marine environment or inland waterways for which there are no located wrecks may be considered to be areas of high



archaeological potential due to the number of historic ship losses recorded for these areas over time. Therefore, developments in riverine, lacustrine, intertidal and sub-tidal environments of archaeological potential should be subject to an archaeological assessment, which should in general be carried out before any grant of permission.

- To ensure that archaeological assessment is carried out in accordance with relevant policies and standards, in particular those set out in the *Framework and Principles for the Protection of the Archaeological Heritage* (Government of Ireland 1999) and the *Policy and Guidelines on Archaeological Excavation* (Government of Ireland 1999) and the advice in particular cases of the Department, with all relevant techniques (including documentary research, aerial photographic research, geophysical survey and archaeological test excavation) being required as appropriate. This will also include, in some cases, the carrying out of building surveys and assessments of upstanding structures to determine the extent to which they are, or contain within them, structures of medieval or early modern date.
- To ensure that all planning applications for developments of categories set out above are referred to the Department through the Development Applications Unit, that such referrals take place in a timely manner and that full account is taken of the recommendations made by the Department.
- That permission for proposed development will be refused where the development cannot be carried out in a manner compatible with the protection of the archaeological heritage as provided for in the policies and objectives contained in the development plan and in relevant national policies, in particular the *Framework and Principles for the Protection of the Archaeological Heritage* (Government of Ireland 1999).
- That where permission is granted for proposed development such grants of permission will contain appropriate conditions to secure the protection of the archaeological heritage, either by preservation *in-situ* or, where impact cannot be avoided, by way of preservation by record. In imposing such conditions, the planning authority will act in accordance with relevant policies and standards, in particular the *Framework and Principles for the Protection of the Archaeological Heritage* (Government of Ireland 1999) and the *Policy and Guidelines on Archaeological Excavation* (Government of Ireland 1999), and be guided in particular cases by the advice of the Department of Housing, Local Government and Heritage. Such conditions may require, as appropriate, archaeological assessment, preservation *in-situ*, preservation by record and/or archaeological monitoring as well as post-excavation conservation, analysis and reporting.
- That where preservation *in-situ* is required as a condition, further conditions may require appropriate immediate and long term conservation and management of the archaeological features in question and long term monitoring of the effectiveness of conservation measures, with appropriate steps required to be taken in the event conservation measures are proving in-effective.
- That where preservation by record is required as a condition, such conditions will further require preparation of appropriate follow-up reports, analyses and



publications and the conservation as necessary of archaeological material and objects recovered during the archaeological excavations as carried out.

- That where permission is granted conditions may require presentation to the public of archaeological features preserved *in-situ* on the site, where practicable, and/or provision of interpretive material at the site (including on a permanent basis) whether or not any features have been preserved *in-situ*.
- That where archaeological excavation is required as a condition of permission, further conditions may be imposed requiring the provision of public access to such excavations, subject to appropriate safeguards.
- That where conditions are imposed for the protection or preservation of the archaeological heritage, these will make clear that the costs of implementing these are to be borne by the developer.
- To develop the planning authority's own professional archaeological expertise and involve that expertise in dealing with planning casework, including the drafting of future revisions of the development plan.

RE: 7.4.2 Burial Grounds

Due to the particular concerns (as outlined above) presented by applications for extensions to medieval graveyards, the following new County Policy Objectives should be included in the County Development plan.

- To protect historic graveyards, including through the avoidance of extensions to them that would have an inappropriate level of impact on sub-surface archaeological remains or on their setting or amenity and, in that regard, as an alternative to extensions to historic graveyards to endeavour to find alternative locations where additional land for burial is considered necessary.
- To ensure that historic graveyards in the ownership or care of the local authority are managed and maintained in accordance with appropriate conservation standards and that local communities involved in care and maintenance of historic graveyards receive appropriate advice regarding such standards.

Architectural Heritage

The Department recommends that built heritage is considered as an integral part of the wider built environment and should be dealt with holistically throughout the development plan. As part of awareness raising of the county's built heritage resource the Department recommend the appointment of a Conservation Officer with expert skills and practical experience to support the council in its stewardship of the county's rich architectural heritage legacy, to guide best practice in terms of leading heritage-led regeneration, the reuse and the adaptation of historic buildings to climate change, to support the implementation of national grant schemes such as the Historic Towns Initiative, the Irish Walled Towns Network and the Built Heritage Investment Scheme and to support the



securing of urban regeneration funding and to coordinate major infrastructural projects such as transport and flood relief works.

Overview of policy context;

The renewal of a number of key national policy documents pertaining to archaeology and built heritage, including (Draft) Heritage Ireland 2030 and the Climate Change Sectoral Adaptation Plan for the Built and Archaeological Heritage, the (Draft) Built Vernacular Strategy and the National Policy on Architecture (pending), provide the context for this response. We welcome where possible that the policies and objectives of these core documents be inserted into future development plans. We note that research into the symbiotic relationship between cultural heritage and the biodiversity provides opportunities to build capacity as per the National Biodiversity plan 2017 – 2021 actions.

The development of these new policy documents, position archaeology and built heritage as a central and integrated theme within all government policy, planning & funding frameworks. These new policies are of strategic importance in terms of our alignment with EU policies and funding programmes ensuring resilience in the face of significant challenges particularly the impacts of Brexit, climate change and COVID 19 pandemic. The Department recognise that is an important time to be working collaboratively and strategically with Local Authorities particularly with regard to vulnerable built heritage sites, the safeguarding of vacant buildings and the promoting/enabling reuse and repurposing of existing cultural assets. In this regard the Department notes the importance of new areas of interest including our built vernacular architecture and its setting both rural and urban, the focus on historic town centres and their vitality post the impact of COVID -19 pandemic and the protection and uniqueness of planned and designed landscapes.

The Programme for Government supports the 17 No. Sustainable Development Goals adopted by the United Nations and built on the principle of 'leaving no one behind'. Cultural and natural Heritage as part of the wider built environment is represented by Goal No. 11- *make cities and human settlements inclusive, safe, resilient and sustainable*. Targets to be achieved are wide-ranging including the adoption and implementation of integrated policies and plans towards *'inclusion, resource efficiency, mitigation and adaptation to climate change, resilience to disasters and implement holistic disaster risk management at all levels'*, whilst targets for cultural and natural heritage are focused on strengthening its protection.

The Sustainable Development Goals speak to formulation of the National Policy on Architecture – *Places for People*, which is currently progressing with support from several governmental departments and the OPW. The Department recognise the strategic importance of the role of the Local Authorities and the welcomes their leadership of them in implementing the actions of the a National Policy on Architecture; in all aspects of research, design, procurement and communication as the basis for securing funding programmes and delivering a high – quality built environment for everyone particularly in urban areas.

Historic urban centres – cities, towns and villages, have become the focus of government due to the negative economic impact of COVID -19 pandemic on urban centres and their



communities. Home working imposed by lockdown has seen a desire by many to re-balance live-work arrangements and to improve quality of life and has led them to consider relocation to dwindling country towns to avoid long commutes. These societal shifts is an opportunity for vacant town centre buildings and for Local Authorities to support the reuse of under-utilised buildings by putting in place skilled teams to enable appropriate and sustainable development. The Department is supportive of consideration of the quality of the built environment as the setting for our lives, our work and recreation and the role of cultural heritage as the capital for societal well-being, innovation and for social cohesion. Our Built and archaeological heritage provide the structure and form of our historic towns and villages, where cultural layers have evolved and continue to develop over time. The COVID-19 lockdown has demonstrated the importance of cultural and natural heritage sites and their often shared amenity, which supported well-being in communities particularly in urban centres during the pandemic lockdown. The Department supports the holistic integration of heritage – led strategies to deliver key infrastructural projects such as rural broadband and its sensitive installation in historic towns, the heritage-led regeneration of urban sites and the incorporation of trans-generational housing, accessible services such as health care centres adapting key town buildings and the wider consideration of cultural heritage and the opportunities its presents in relation to flood mitigation.

The Department welcomes the opportunity for making cultural heritage more accessible and better integrated with wider tourism and recreational opportunities of the county. This will be strategically important to enhancing as well as spreading the tourism capacity through the county's heritage sites and historic towns. The Department supports the integration and communication of multiple strands of cultural and natural heritage, particularly through the implementation of blue and green infrastructural project that holistically deals with all aspects of archaeological, built and natural heritage. By delivering high quality renewal and enhancement to existing places the social, environmental and economic objectives for sustainable development of communities will be met and cultural heritage significance, conservation best practice, preservation and protection of biodiversity of these places will be raised in general.

The Local Authorities leadership in the on-going support of conservation practice and the development of expertise across the heritage sector is of strategic importance in maintaining finite resources and the nurturing of specialist skills and knowledge for guiding maintenance, repair, remaking, adaptation and conservation of built heritage to best conservation practice. It is envisaged that significant development in the skills capacity is required to address conservation / repurposing / mitigation / emergency management issues affecting historic structures and sites in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works and to retain regional distinctiveness. In the context of the EU Commission's rebuilding strategies including the Renovation Wave and the recently introduced concept of an European Bauhaus (a new culture of building well for everyone drawing on the skills and resources of our time), the Department welcomes the Local Authorities support for research and promotion and communication of appropriate, well-informed energy efficiency design as well as the sensitive upgrades to historic buildings through the dissemination of factual and relevant information to the general public. By reusing, repairing, adapting and upgrading buildings in a sensitive and holistic way Ireland will be supported to move towards a low-carbon society



and a circular economy supporting local craftsmen and trades. This approach will support heritage-led regeneration and engagement with local communities to undertake projects of high quality design and conservation.

In summary there are a number of new areas of interest that the Department consider require greater attention and focus in future development plan and policies of Local Authorities including;

- a. National Policy on Architecture – Places for people/5 themes to be embedded in the future development plan policies to ensure the delivery of and implementation of government’s policy, including the Local Authorities role in ensuring the delivery of high quality architecture and quality place making for everyone and in demonstrating best practice in the care and maintenance of historic properties in its ownership. This report is to be published 2021
- b. Heritage Ireland 2030 (Draft)– 3 strands to be embedded and the importance of communication, digital opportunities and community engagement as part of the delivery of built heritage policies
- c. National Inventory of Architectural Heritage – Cultural landscapes, vernacular architecture and early urban buildings to address the incremental damage and cultural loss of early settlements and their settings due to the lack of awareness, vacancy and demolition.
- d. Built Vernacular Strategy (Draft) to enhance the understanding, minding and handing-on of our built vernacular.
- e. Pleasure landscape – the inclusion of policies for planned/designed landscapes their long terms survival and evolution
- f. Climate Change – heritage resilience and sustainability, consideration of appropriate measures to ensure the long term survival of historic structures, their uses and their contribution to the sense of place.
- g. Town revitalisation - Enhanced policies for heritage-led urban regeneration based on an understanding of their cultural layering/transmission of cultural significance/high quality adaptation, reuse and renewal of historic fabric and remaking of historic places.
- h. The identification, reuse and repair of early urban buildings – raising awareness of the cultural significance of early building fabric as an integral part of historic urban centres and supporting the develop of multi-disciplinary practice between archaeologist and conservation experts.
- i. Flood Relief works – attenuation, upgrading and repair of existing infrastructure, high quality design of new infrastructure and coordination with public realm/recreational amenity in urban centres
- j. Tall buildings in historic urban centres – mitigation of negative impact on historic character areas and urban landscape in relation to large ground scrappers as well as tall buildings through the consideration of design criteria and guidance to safeguard the historic built heritage context.

The renewal of Local Authority development plans is timely in terms of the global climate change challenges and presents opportunities for the potential of built heritage to be fully considered in future county development plans as a central theme. The impact of climate



change is already been focused through Local Authority Climate Action Regional Offices (CARO) on urban settlements, their resilience, adaptation and consolidation. The Department welcome the Local Authority initiating research, implementing policy, raising awareness and providing guidance to owners of historic buildings on such issues as thermal upgrading and building repair requires in-house expertise to provide coherent and coordinated advice and a key recommendation is the appointment of key resources such as Conservation Architect, Archaeologist and Heritage Officer to undertake the delivery of the Departments policies.

The following themes are recommended for inclusion along with objectives and policies that accord with the 'Built Heritage' to be coordinated.

Local Authority Climate Change Adaptation Strategy

Under the Climate Action and Low Carbon Development Act 2015, the Department has prepared a climate change adaptation sectoral plan for the Built and Archaeological Heritage. We are engaged with the Climate Action Regional Offices (CAROs) through our Climate Change Advisory Group to ensure a consistent approach to protection and adaptation of heritage across the country. We anticipate ongoing engagement with the CAROs throughout the implementation of our sectoral plan.

While the architectural heritage of this country has survived well in the past, changing climatic conditions may make it less able to cope. Climate change can alter and accelerate decay or can overwhelm the capacity of older structures to deal with severe weather events, increased extremes of wetting and drying, or cold or heat. There is also a significant threat to architectural heritage from climate action posed by maladaptation, that is, poor quality or ill-advised adaptation works leading to damage to heritage, whether directly or indirectly.

In the preparation of the local authority adaptation strategies, there are a number of issues regarding protection of architectural heritage that we recommend should be taken into account to identify the architectural heritage at risk in its area, to assess its vulnerability to climate change and develop disaster risk reduction policies for direct and indirect risks. For example, we recommend the strategy should undertake to:

- Identify the architectural heritage in the local authority area, that may be under threat, directly or indirectly, due to climate change. This should include, but not necessarily be restricted to, the protected structures and architectural conservation areas designated in the local authority Development Plan. It is noted that due to the COVID -19 lockdown of urban centres that many town buildings have been left vacant and inaccessible and many will not re-open. Buildings that are left with poorly forming rainwater goods, roof coverings and badly secured will be very vulnerable in inclement weather.
- Include objectives to carry out climate change risk assessments for the historic structures and sites in the local authority's functional area particularly those in the authority's own remit



- Include objectives to develop disaster risk reduction policies addressing direct and indirect risks to the architectural heritage in its area
- Include objectives to develop resilience and adaptation strategies for the architectural heritage in its area
- Develop the skills capacity within the local authority to address adaptation / mitigation / emergency management issues affecting historic structures and sites in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works

We recommend that, where such officers are employed, the architectural conservation officer and/or heritage officer should be included on the local authority's Adaptation Steering Group.

The revitalisation of Historic Urban Centre – cities, towns and villages

The Department is a key stakeholder in promoting the revitalisation of historic urban centres and has had a central role in the development of innovative policy, guidance on best practice in the reuse of existing buildings and the development of high quality public realm, concepts which have been supported through annual funding programme for towns and their building fabric. In support of the vision of the National Development Plan, the Department is developing a National Policy on Architecture (NPA), under several themes, all of which are applicable to the future sustainable development of town centres i.e. research strategies required to inform planning and development, heritage-led regeneration and climate change adaptation and the design of high quality places for people. During the consultation phase of the NPA, the Department, has received many significant contributions and presentations - the Collaborative Town Health Check Programme (CTHCP) demonstrated its strategic importance to informing future town management policy by providing the point of engagement with a business community, the compilation of baseline data for assessing and visualising the well-being, quality and economic vitality of a town centre and allowing comparison to be made with European counterparts on the significance of the current vacancy rates presenting in Irish towns, pre COVID -19 lockdown. The Department welcomes the establishment of baseline data for town centres and its use to inform future heritage-led development strategies based on enabling and reuse of under-utilised buildings.

As Ireland emerges from lockdown society has never been more aware of their surroundings and the benefit that a quality built environment brings to their lives. Whilst areas of disadvantage and constraints of urban living have been highlighted during the lockdown, Government has acknowledged the need to provide economic stimulus to assist society in its recovery. The EU is similarly posed to providing support to Member States with policies and funding being aligned to deliver the upgrade existing building stock as an integral part of climate change adaptation, town revitalisation and economic prosperity. The Department's built heritage grant schemes have been revised to tackle climate change resilience and to gather information to inform future funding strategies and practices for towns. The Architectural Conservation Officer has a key role in the implementation of such scheme, communicating their benefit, developing best practice and supporting traditional skills to retain the local character.



Acknowledging that a greater percentage of inhabitants now live in urban centres than the countryside, urban centres provide the opportunity to focus on the challenges and opportunities that climate change adaptation and the re-purposing of our extant building stock will bring. Historic building refurbishments and conversions in small settlements and rural areas have helped to accommodate new uses, facilitating rural economic diversification. Historic areas often provide the focus for leisure facilities, from theatres and art installations to restaurants and bars. Historic buildings, areas and waterways can serve as catalysts for the repopulation of inner-city areas and development of new and sometimes more specialised housing, retail and leisure markets.

Programmes such as the CTHCP health check surveys provide the imperative to the Local Authority as well as the basis to become more attentive of the well-being of towns as providing an understand of the opportunity to focus through a single lens and to ascertain the benefit of interconnecting government policies and funding to greater effect and benefit of rural society. The adoption of governance tools within Local Authorities such as the Health Check Programme, Conservation Plans for special sites, Living Town Initiatives and their respective setting up of one-stop –shops to promote and coordinate the planning and building regulatory aspects of urban regeneration is regarded as a positive and proactive means to enabling built heritage to be reused and adapted successfully, It is a planning model that may be applied to the various scale of urban settlement as necessary.

Policy

- To consider concepts of historic urban landscapes as a collection of buildings at the various scales of settlement, the origins of Irish cities, towns and villages which give rise to their special characteristics. These include setting, topography and natural features. The conservation and reuse of early traditional structures, roofscapes of historic centres and the recognition of interrelationships between sites and landscape features in terms of the insertion of new buildings and managing their impact on the historic environment.
- To consider a *Town first* approach to the revitalisation of historic urban centres, the appointment of a Local Authority multi-disciplinary team which communicates the historical, architectural context and focuses on the repair and upgrade of existing historic buildings and their adaptation to new uses with regard to their architectural character and significance.
- To promote the development of heritage-led regeneration, to plan for the reuse and conservation of core built heritage and archaeological sites within urban centres as an integral part of the evolution of the historic place and its significance.
- To consider the identification of built heritage at risk registrar as the basis for actively managing, attracting funding and resources, drawing on the legislative



provisions to safeguard protected structures and their setting i.e. enabling works to ensure their long terms survival, appropriate moth-balling and inspection to prevent further deterioration or loss.

- To promote best conservation practice and to lead by example through the management and safe-guarding of historic properties in the ownership of the Local Authority.

- To support the development of sustainable infill to the town back lands that is appropriate in scale and character to that of the historic centre, that transitions and accommodates surviving structures and retain the historic streetscape form particularly within sensitive areas of built and archaeological importance. To ensure the strategic housing development support rather than detract from the vitality and overall character of historic town centres in terms of their scale, connection and mobility strategies.

- To draw on the historic environment viewer, to compile core data information about the built and archaeological evolution of historic places to draw on the readily accessible resources such as historic mapping and databases, i.e. to inform future development strategies and progress based on an awareness of the cultural significance of a place.

- To coordinate significant infrastructural projects such as public realm works, flood relief works or new transport routes and alternative modes of transport to the benefit of surviving historic sites in order to improvement their enjoyment, presentation and enhanced accessibility. We note in this regard examples from European counterparts of the removal of traffic from urban centres and the resulting improvement in air quality which has been exemplified by the recent COVID-19 lockdown and the perceived enjoyment of urban living in Ireland. These transitions support a return to sustainable and attractive urban living.

The National Inventory of Architectural Heritage (NIAH)

Under Section 53 of the Planning and Development Acts 2000-2012, the Minister for Culture, Heritage and the Gaeltacht may, in writing, make recommendations to a planning authority concerning the inclusion of particular structures, specific parts of particular structures, or specific features within the attendant grounds of particular structures for inclusion in local authority Records of Protected Structures. Local authorities must have regard to such recommendations, where they relate to structures recorded by the National Inventory of Architectural Heritage (NIAH) and rated as being of International, National or Regional significance. In development planning, any proposals for development must take account of the possible impact on the historic interest of these structures. If the Council,



after considering a recommendation made by the Minister, decides not to comply with the recommendation, it must inform the Minister in writing of the reason for its decision.

In the case of Longford County Council the Minister has recommended a number of sites for inclusion in the Record of Protected Structures. To date, the Council has included a number of sites as Protected Structures in their own right and as part of Architectural Conservation Areas. The structures that are not formally protected benefit from a form of protection through Section 53(2) of the legislation, which allows the planning authority to have regard to the Minister's recommendations where a building is subject to a planning application.

The purpose of the NIAH is to identify, record and evaluate the post-1700 architectural heritage of Ireland, uniformly and consistently, as an aid in the protection and conservation of the built heritage. A key part of the work of the NIAH is to raise awareness of the richness of the architectural heritage and in this regard, the NIAH maintains a website, www.buildingsofireland.ie, that features all structures recommended by the Minister, in descriptive, photographic and map form. This website is also a useful link to a range of other material, including information about grants, and downloadable publications relating to practical buildings conservation. The NIAH has produced illustrated books for all counties and cities, constituting short introductions to the architectural heritage.

While the NIAH has carried out surveys for all counties, such surveys are representative rather than comprehensive. It is envisaged that all counties will be updated over time, with further ministerial recommendations for inclusion in the Record of Protected Structures.



Policy

- To consider the inclusion of all structures identified by the National Inventory of Architectural Heritage (NIAH) and recommended by the Minister in the Local Authority's Record of Protected Structures.
- To consider that all such structures be regarded as 'Candidate Protected Structures', pending verification by the Council and inclusion in the Record of Protected Structures.
- To direct users of relevant local authority services to the information resources of the NIAH website www.buildingsofireland.ie.

Built Vernacular Architecture

Vernacular architecture is rooted in our traditions and accumulated wisdom and encapsulates our identity. It is characteristic of local communities and environments. Many vernacular houses and farmyards are maintained with pride by their owners, while contributing to the aesthetic appearance of the landscape, with benefits for wellbeing, tourism and the local economy. Importantly, our vernacular architecture also contributes to the world's cultural diversity.

The majority of surviving vernacular buildings, date from the eighteenth and nineteenth centuries, although older examples are also known; the majority of unnamed buildings on the early Ordnance Survey maps are vernacular. Due to the spread of urban centres previous stand-alone structures may have merged with the urban conglomeration and awareness of their importance is diminished. Houses are commonly small and single-storey, but may be lofted, and there are two-storey examples; all have relatively low wall-head and door heights and small, irregularly-placed windows; and many have corrugated-iron roofs (perhaps over thatch). The interiors of such houses, particularly the old kitchen and hearth, are essential to their character. Other building types include the most numerous, farm buildings, but also include, for example, settlements and groupings of farmyards, small-scale industrial items (e.g. limekilns, mills, culm crushers), field systems and lazy-beds, some piers/quays, boat pens, field paths, mass houses, holy wells (and similar features) and stones and other natural features with traditional associations.

Vernacular buildings were constructed by the occupants, users and neighbours and thus no two can be exactly alike. This characteristic extends to house internal layouts, walling and roofing materials, farmyard forms, and even whole settlements. The vernacular tradition differs greatly from formal architectural design, this latter being created by professional builders and designers, influenced by imported styles, and includes most high-status dwellings, public buildings and even social housing.

Vernacular buildings, through their siting, orientation and materials, display an intimate connection with their landscape. Natural materials, including field or quarried stone, mud



and sometimes local brick for walls; wattles for hearth canopies and partitions; straw, reed and other vegetable materials and stone flag or slate for roofs and floors; and timber from the bog or hedgerow are all distinctively local. Corrugated iron, despite its origins, has become part of the vernacular palette. Vernacular building crafts also have a local or regional character, and the work of the blacksmith, for example, is evident in hearth cranes, farm equipment and gates.

Vernacular materials and methods are most appropriate for the repair of vernacular buildings, but also offer potential for new work. Vernacular buildings are inherently good in terms of energy efficiency, with openings placed to maximise light but minimise heat loss, and thick walls that retain heat and gradually release it, and absorb moisture and release it easily, allowing them to 'breathe'. Some modern practices and products, such as use of impermeable materials and making spaces too airtight, can be harmful and simpler, low-tech solutions are almost always better.

Vernacular settlements survive in many counties, usually as farming or fishing hamlets and comprise small groups of houses and yards arranged in a deceptively haphazard manner. They frequently have an attractive visual character and atmosphere and some may have medieval origins.

Thatch covers some older (and some recent) buildings, but now often survives better under corrugated iron. Loss of historic thatch layers and roof structures also represents a loss for agricultural and botanical heritage. Regular maintenance is essential and costs can be considerable, although there is a thatching grant available from the Department of Housing, and the local authority, The Department of Housing, Local Government and Heritage (D/HLGH) and Heritage Council might also provide financial assistance.

Our stock of vernacular architecture has diminished alarmingly in recent decades, with many buildings neglected or replaced, due to changing aspirations and demands. Viable new uses and careful rehabilitation can contribute to sustainable development and encourage social and economic regeneration. The *Government Policy on Architecture 2009–2015* encourages the sustainable reuse of the existing building stock, whether or not such buildings have protected status, and this is particularly pertinent to vernacular architecture.

Policies and objectives

In high-level introduction to development plan

- Recognise that vernacular buildings are characteristic of our local communities and environments and contribute to their authenticity, and to their cultural, traditional, architectural, archaeological, historical and social interest and diversity.

- Promote the appropriate rehabilitation, revitalization and reuse of vernacular buildings, wherever feasible, employing best conservation practice and using traditional, especially vernacular, building methods and materials.

Rural housing/settlement policy



- Proposals for sensitive rehabilitation of disused vernacular houses will not be subject to the Rural Settlement Strategy for housing in the countryside that applies to new dwellings, assuming that their vernacular character is not compromised, that their fabric is repaired using appropriate techniques and materials, and that the structure was previously a dwelling. Where a building is derelict, measures should be taken to support and protect the building from collapse prior to and during works.

- There will be a presumption against the demolition of vernacular buildings where restoration or adaptation is a feasible option.

- To consider the uniqueness of vernacular buildings and ensembles in terms of their focused and specific relationship with their immediate environment as a model and guide for the development of modern design approaches in rural and other appropriate settings.

Climate change and sustainability/energy efficiency

- To recognise the inherent sustainability of vernacular buildings by virtue of their use of natural and renewal materials of local origin.
- To ensure the continued sensitive and appropriate rehabilitation and reuse of vernacular buildings in the interest of sustainability.
- To ensure the conservation and reuse of traditional materials in the interest of sustainability, good conservation practice and maintaining the long-term viability of such buildings and their associated features.
- The retention and careful rehabilitation of historic buildings in our landscapes, including vernacular houses and other structures, whether urban or rural, allows the materials and embedded energy of these structures to be harnessed for present and future generations. Removal and replacement of such buildings represents a waste of their embedded energy and such proposals should be subject to rigorous scrutiny.
- Where permission is sought to demolish a vernacular building on the grounds of structural defects or failure, or that it is not reasonably capable of being made structurally sound, such a contention must be convincingly demonstrated through a detailed report on the existing condition produced by a professional with appropriate conservation expertise and, preferably, an understanding of vernacular buildings. As part of such justification, details will be required of remedial works normally used in similar circumstances and setting out why these would not be appropriate.
- Where a building has been destroyed by fire or accident, the Council may consider demolition to be appropriate, but a report by a professional with appropriate conservation expertise, specifying the cause and extent of damage, will be required. As a minimum, a vernacular building proposed for demolition should be fully recorded to an agreed professional standard. If a disused vernacular house is demolished or replaced with a replica, the Rural Settlement Strategy will apply.
- Ensure that measures to upgrade the energy efficiency of vernacular buildings acknowledge their inherent vernacular characteristics, techniques and materials and do not have a detrimental physical or visual impact.



- Promote and support appropriate and well-informed energy efficiency upgrades to vernacular buildings through the dissemination of factual and relevant information to the general public.

Rural development/farm diversification/tourism

- Encourage and facilitate the sensitive reuse of vernacular houses or farm buildings for farm diversification, agri-tourism and rural development, including self-catering accommodation, arts or craft workshops and small-scale manufacturing. Guidance and information can be found in *Traditional Buildings for Irish Farms* (2005) published by the Heritage Council and Teagasc, and *Reusing Farm Buildings: A Kildare Perspective* (2006) published by Kildare County Council.

Architectural heritage/conservation

- To protect, maintain and enhance the established character and setting of vernacular buildings, farmyards and settlements.
- Development proposals affecting vernacular buildings will be required to be accompanied by a detailed measured survey, photographic record and written report carried out by a professional with appropriate conservation expertise and, preferably, an understanding of vernacular buildings. Early consultation with the planning authority is strongly advised.
- Facilitate appropriate, high-quality design solutions for adaptations of vernacular buildings that carefully consider their vernacular qualities in terms of design, scale, setting and finishes. While new design can be expressed in contemporary architectural language, consideration should be given to exploring the use of appropriate vernacular features, building techniques and materials.
- Where it is proposed to extend a vernacular house, the design, scale, footprint and materials should be sympathetic to the existing building and its setting. Extensions should generally be located to the rear and not obscure the form or layout of the existing building; substantial removal of walling is not generally recommended; connecting the existing building and extension should minimize the number of new openings and ideally use existing openings; sometimes, an outbuilding contiguous to a dwelling can be successfully incorporated.
- Promote the protection and maintenance of the character and setting of vernacular buildings, farmyards and settlements, including historic gateways, boundaries and other features.
- Ensure that developments proposed within or adjacent to vernacular settlements respect and enhance their spatial character, building forms, features, details and materials.



- Promote the protection and maintenance of thatched buildings (domestic or non-domestic),
- particularly those with historic layers and roof structures.

- To maintain an up-to-date record of thatched buildings, promote available grant schemes and facilitate engagement with owners in the maintenance of these buildings.

Rural settlement/architectural conservation

Consider the protection of vernacular settlements by means of Architectural Conservation Area designation, promote the reuse of disused or unoccupied buildings within them, and ensure that developments proposed within or adjacent to vernacular settlements respect and enhance their spatial character, building forms, features, details and materials **National Inventory of Architectural Heritage – Garden Survey/Cultural Landscapes**

The National Inventory of Architectural Heritage (NIAH) has compiled a record of significant historic designed landscapes, demesnes and gardens throughout the country. The objective is to begin a process of understanding and appreciating the extent of this rich heritage.

County Longford boasts a significant number of such places. A notable example such as St. Mel's Cathedral, Longford is considered a county highlight in the NIAH Survey. Other historic places may include private gardens, public parks or landscapes associated with country estates and demesnes.

The Department recognises the contribution that these planned landscapes make to the appearance of the countryside, and their significance as a source of information about history and society in the county. These places also hold significant resources for biodiversity because of their wide range of habitats, whether open grassland, water courses and open water, woods and copses, and old buildings and walls. Our designed landscapes, demesnes and gardens provide havens for an enormous variety of animal and plant species and, through careful enhancement and rehabilitation, these can offer significant potential for enhancing biodiversity more generally. Importantly, such places are also helping to mitigate the effects of climate change. Where such places are open to the public, they offer tremendous opportunities in terms of mental and physical health and wellbeing through being in close contact with nature.

Since medieval times, demesnes were lands retained by a lord for his own use and occupation, with associated gardens and places for food provision, such as orchards, pigeon houses, rabbit warrens and fishponds, adjacent to the principal residence. Over time, demesnes were developed to include 'naturalistic' parkland, woodlands and additional buildings, such as gate lodges and follies.

These historic designed landscapes, demesnes and gardens may not be in the Record of Protected Structures *per se*, although various constituent elements may be included. Elements of such places include: the demesne house and outbuildings, gates and boundary walls, avenues, walled gardens and pleasure gardens/landscapes, glasshouses and orangeries, icehouses, pigeon-houses, bridges and follies, private chapels, graveyards and mausolea, canals, lakes and duck and fishponds, rabbit warrens, tree-rings, copses,



coverts and plantations; also associated features built by the owners of these places (such as workers' houses, schools, etc.).

These habitats contain collections of plants and specimen trees that may be of national or international botanical importance and interest. They may also be of significant historical and aesthetic interest, or illustrate aspects of the development of gardening and of gardens and parks, providing insights into changes in society over time.

Cork County Council has produced a document, *Guidance Notes for the Appraisal of Historic Gardens, Demesnes, Estates and their Settings*, that is an attractive guide for understanding designed landscapes and, in the case of development proposals, facilitating the preparation of appraisals of historic gardens and designed landscapes and possible impacts on their heritage value.

<https://www.corkcoco.ie/sites/default/files/2017-04/Guidance%20Notes%20for%20Appraisal.pdf>

Creative Ireland have recently produced the following publication in support of Historic Irish Houses <https://www.creativeireland.gov.ie/app/uploads/2020/12/HHI-CI-Report.pdf>

Policies

- To identify significant historic designed landscapes, demesnes and gardens for protection under the development plan.
- To designate Architectural Conservation Areas, where considered appropriate, in order to preserve the character of historic designed landscapes, demesnes and gardens.
- To identify and protect significant views to or from such places.
- To encourage the compilation of Conservation Plans for the long term conservation and management of cultural landscapes and their components in the ownership of the Local Authority/State.
- To cooperate with the National Inventory of Architectural Heritage in assessing and celebrating historic designed landscapes, demesnes and gardens.
- To encourage and facilitate the retention and careful maintenance of these places and the various components set out in the introduction above.
- To encourage the cataloguing of plant collections, trees and habitats within these places to appropriate national standards.
- To encourage the cataloguing of fauna within these places to appropriate national standards.
- To protect and promote heritage and traditional varieties of plants and trees within our historic designed landscapes, demesnes and gardens.
- To promote public awareness, enjoyment of and access to these sites and to seek the cooperation and assistance of other interested parties, including Government Departments and state agencies, in this regard.
- To preserve and protect the biodiversity of these places and, where appropriate, to encourage the enhancement of the range of plant and animal species, in order to add to local, regional and national biodiversity.



- To promote conservation, renewal and improvement that enhances the character and setting of historic designed landscapes, demesnes and gardens and of former examples of such places, and to resist proposals or developments that would lead to the loss of, or cause harm to the character, principal components, or setting of these places.

To require a detailed appraisal of the potential impacts of any development proposed for within or adjacent to these places, or that might affect its setting. A methodology for preparing such an appraisal can be found in the *Guidance Notes for the Appraisals of Historic Gardens, Demesnes, Estates and their Settings* (Cork County Council, 2005). Applicants for proposed large-scale developments within historic designed landscapes, demesnes and gardens may be required to produce 3D Digital Survey Modelling to demonstrate that the proposed development does not adversely affect the site or its setting.

To have regard to *Guidance Notes for the Appraisal of Historic Gardens, Demesnes, Estates and their Settings* (2006) published by Cork County Council (<https://www.corkcoco.ie/sites/default/files/2017-04/Guidance%20Notes%20for%20Appraisal.pdf>) and to the *Architecture Heritage Protection Guidelines* (2011) published by the Department of Culture, Heritage and the Gaeltacht (<https://www.buildingsofireland.ie/app/uploads/2019/10/Architectural-Heritage-Protection-Guidelines-for-Planning-Authorities-2011.pdf>) in the appraisal and description of historic designed landscapes, demesnes and gardens.

Nature Conservation

The Department welcomes the invitation to make a submission in relation to the draft County Development Plan (CDP) in relation to likely significant effects on the environment, on European sites, and on biodiversity generally.

Background

The Department made observations on the review of Longford County Development Plan 2015-2021 and the preparation of the new Longford County Development Plan 2020-2027 Issues Paper, Development Applications Unit (DAU), (File Reference LF-LF-A191003-0017, and Local Authority (LA) File Reference FP2019/079) on the 22nd November 2019. The Department works within the framework of the National Biodiversity Action Plan 2017-2021 to conserve and restore our biodiversity. Ireland is a signatory of the United Nations (UN) Convention on Biological Diversity, Strategic Plan for Biodiversity 2011-2020, and is fully committed to halting the loss of biodiversity and degradation of ecosystem services as set out in the EU Biodiversity Strategy to 2030.

The Department's observations are offered to assist the Longford County Council in meeting its statutory obligations with regard to protecting natural heritage including European sites [Natura 2000 – Special Areas of Conservation (SACs) & Special Protection Areas (SPAs)], Natural Heritage Areas (NHAs), other natural habitats, protected species



and biodiversity in general, during the process of preparing and implementing the proposed County Development Plan (CDP) for 2021-2027.

Natural Heritage:

The Department welcomes the inclusion of 'Natural Heritage and Environment', 'Green Infrastructure' and 'Climate Change' as prominent chapters within the draft plan. The aims within these chapters will assist Longford County Council in meeting the main objectives of the National Biodiversity Action Plan (NBAP) 2017-2021 and the EU Biodiversity Strategy 2030, which are to, respectively:

- *'Mainstream biodiversity into decision making across all sectors'*,
- *'Bringing nature back into our lives'*

The Department acknowledges and welcomes, in terms of protecting biodiversity in the County, Longford County Council using the Ecosystem Services approach, in developing the Plan objectives and that the Plan will promote this approach. It is also noteworthy that Longford County Council recognises the importance of managing the natural capital in the Core strategy of the Plan. The inclusion of 'Green Infrastructure' as a Chapter in the Plan is an important aspect of protecting biodiversity that has been included in this draft as an innovative approach to the maintenance of natural capital and preservation of biodiversity. The Department would recommend that this could be further strengthened by the inclusion of NBAP objectives in the Plan at an early stage. In accordance with Objective 1 of the NBAP which is to mainstream biodiversity into decision-making across all sectors, the Department advises that 'management of biodiversity' should also be included to ensure that there is net gain in biodiversity.

There are a number of positive Natural Heritage and Environment policy objectives which are acknowledged by the Department as important in the context of biodiversity protection and enhancement. Specifically, 12.1 and 12.4 supporting the National Biodiversity Action Plan, All Ireland Pollinator Plan and the National Peatlands Strategy. The draft Plan recognises the importance of Natura 2000 sites, the Natura 2000 network and the international importance of the sites within the County, which is welcomed. Specific observations on policy objectives are intended to be of assistance in enhancing and strengthening sections of the plan which already have been identified as important natural heritage policies.

The Department notes the inclusion of objectives in relation to Appropriate Assessment (AA) in the Natural Heritage and Environment Chapter. The Department recommends that this section on AA is included in an earlier chapter of the draft plan as an overarching policy to ensure that all plans and projects flowing from the draft plan are subject to screening for AA and where necessary AA. Objectives in relation to AA should be clear and concise. For example, CPO 12.7 could be simplified to state, "*Require screening for Appropriate Assessment for development not directly connected with or necessary for the management of Natura 2000 Sites*". Objectives should clearly state the intention that all plans and



projects flowing from the County Development Plan should pass the Article 6(3) test, and avoid adversely affecting the integrity of European sites. It must also be clear that any derogation under Article 6(4) of the Directive can only be considered in exceptional circumstances which meet the strict requirements of the Directive in this regard.

The Department further acknowledges the range of positive objectives and the protection afforded to Natura 2000 sites, NHAs and pNHAs in the draft Plan. The Department would like to offer a further recommendation that objectives 12.13 and 12.15 - 12.19 could be further enhanced by including an objective which requires 'Ecological Impact Assessment (EclA)' for any proposed development which may have a significant impact on rare, threatened and/or protected species and non-designated habitats of biodiversity value. In addition, the Plan should acknowledge the strict protection, provided for by the Habitats Directive, which applies to Annex IV species (e.g. Bats and Otter) wherever they occur; and should provide for this protection to be fully implemented in any plans and projects arising from the Plan. For example, the Department recommends that where it is proposed to renovate old existing buildings or development which would affect trees and hedgerows, such proposals are subject to Bat surveys as part of any development application and similarly where development is proposed near to watercourses (i.e. outside a Natura 200 site) that an Otter survey is carried out.

In relation to surveys carried out for the preparation of Environmental Impact Assessment (EIA or EclA), NIS, or other assessments that generate biodiversity data previously unknown or unrecorded in a county; the Department would encourage the council to include an objective requiring these data to be submitted to the National Biodiversity Data Centre (NDBC). This would strengthen the county's knowledge base on biodiversity and ultimately aid its protection.

Further positive aspects of the 'Natural Heritage and Environment' objectives include those for 'Biodiversity and Nature Conservation' and 'Non Designated sites'. The Department welcomes the recognition of these features in the wider countryside and acknowledges the survey work already completed by Longford County Council on wetland surveys in the county; and would encourage the use of the Ecosystem Services Scoring approach in mapping these and other wildlife corridors e.g. hedgerows and trees to help inform the planning process during the lifetime of the Plan.

The Department welcomes the strong objectives in relation to protecting wetlands and peatlands and would like to highlight the importance of peatland habitats within the county. Section 12.9 Peatlands, could be further enhanced with the inclusion of an objective to support the aims of the National Peatlands Strategy and the implementation of the National Raised Bog Special Area of Conservation Management Plan 2017-2022; and the restoration works which will commence during the lifetime of this Plan, as a positive conservation measure which will reduce carbon loss in the County. Included in the National Peatlands Strategy and the National Raised Bog Special Areas of Conservation Management Plan 2017-2022 are the objectives to responsibly manage, protect, enhance, restore and rehabilitate raised bog habitat in recognition of its contribution to society, climate action, the environment and the economy. In that context, the National Raised Bog



Special Areas of Conservation Management Plan 2017–2022 sets out how the raised bog special areas of conservation are to be managed, conserved and restored and how the needs of turf cutters are to be addressed.

Development proposals on designated and non-designated peatlands may be subject to the requirements of the planning code, the Environmental Impact Assessment Directive, (including EIA screening requirements and EIA where applicable), and the requirements of the Habitats Directive (including the need for screening for Appropriate Assessment and AA), as appropriate. The Department recommends a clear policy objective in the draft County Development Plan in relation to development on peat to ensure clarity in relation to the requirements of the planning code as provided for in the Planning and Development Act, 2000 (as amended) and the Planning and Development Regulations, 2001 (as amended) and environmental assessment in this regard.

It is also encouraging to note the commitments set out in Section 12.13 with respect to addressing the Invasive Species issues in the County could be further enhanced by using the Ecosystem Services Scoring approach to will help identify key areas to be addressed.

With respect to the Light Pollution objectives, 12.102 and 12.103, in addition to potential impacts to bats (all bat species are listed under Annex IV of the Habitats Directive) from incorrect types of LEDs, the Department would like to highlight the EUROBATS¹ and Dark Sky lighting recommendations² which provide further information on reducing the impact of lighting on wildlife. In keeping with Dark Sky Ireland Lighting Recommendations, the Department suggests that, as a general rule, LED luminaires with warmer colours (i.e., CCT values at or below 2700K) be specified for future installations to avoid environmental impacts associated with blue-rich LED light. Given the proposed upgrading and expansion of artificial lighting and its potential negative impacts on biodiversity, the Department suggests that an objective of the plan could be the development a Public Lighting policy.

Green Infrastructure:

The Department welcomes the inclusion of ‘Green infrastructure’ (GI) in the draft Plan and notes the importance of maintaining and enhancing GI in the County in CPO 3.14. The Department supports the objective of the Government’s National Greenway Strategy to assist in the strategic development of nationally and regionally significant Greenways in appropriate locations. However, clarity is recommended when using the term GI, as defined by the EU definition, to ensure it is not confused with the provision of greenways, blueways and peatways. There are a number of policy objectives for greenways, blueways and peatways, within and adjacent, to European designated sites within the chapter ‘Green Infrastructure’, including for example, CPO 13.17 “*Investigate the provision of mooring points on the islands within the major lakes of the County.*”

The Department would like to highlight that the same risks to biodiversity can be associated with these type of trails (i.e. blueways and associated moorings), as with any other road

¹ EUROBATS Series No. 8 publication, Guidelines for consideration of bats in lighting projects, 2018

² Dark Sky Ireland Lighting Recommendations, 2019



development, and would recommend the need to apply the precautionary principal when screening for Appropriate Assessment (AA) and/or undertaking AA for greenways, blueways and peatways; in light of existing increased recreational disturbance at river and lake sites e.g. Lough Ree Special Area of Conservation and Special Protection Area. As advised in the National Greenway Strategy, greenways and other associated linear trails should be designed to take into account, and avoid where necessary, the sensitivities of natural heritage.

Tourism:

The Department welcomes the aim in section 10.2 the aim in 10.2, “*It is critically important that all Tourism developments and activities are nature enhancing, carbon neutral and climate friendly.*” The Department would like to highlight that increased tourism can also cause increased disturbance to wildlife and habitats.

The Department welcomes the proposal to establish Lough Ree as a UNESCO Biosphere Nature Reserve and the proposal of a Mid-Shannon Wilderness Park which is to include a proposal of a Lough Ree Visitor Centre. The Department looks forward to working with the relevant Local Authorities and stakeholders in this proposal and notes the importance of all the Lakes, Waterways and Broad zones within the County for both residents and tourism.

The Department acknowledges the commitment by Longford to protect these areas from inappropriate development and notes that while this is reflected in CPO 12.26. CPO 12.24 does seeks to provide additional access to these areas which may affect Natura 2000 sites.

These proposals should be screened for AA, and assessed for impacts to biodiversity at the earliest stage of planning. It may also be useful to examine a range of options in relation to such access provision in order to avoid impacts to biodiversity.

The Department welcomes the objective of CPO 12.11 to undertake surveys and collect data and would recommend that surveys to monitor and manage any increase in visitor numbers, to avoid significant effects on habitats or disturbance to species, are included in this CPO. CPO 12.11 should be used in terms of monitoring the impacts of the Plan.

Land zoning:

The Department welcomes the Plan’s commitment to sustainable transport, new housing and prioritising existing brownfield/infill sites; ensuring that any development is appropriately located within the County.

The Department would like to commend the Council on the zoning of the recreational/amenity/green space areas in many of the towns within the Plan. Specifically, the Department would like to highlight that many of these areas zoned within the Plan are along watercourses and riparian habitats and recommends that new guidance from Inland Fisheries Ireland (2020) on ‘*Planning for watercourse in the Urban Environment is considered in the Plan*’. For example, in Ballymahon, this zoning is included along the River



Inny. It is an opportunity to enhance biodiversity and GI in these areas and it is recommended that the Ecosystem Services scoring approach is used to score and map these 'recreational/amenity/green space' zones within each town to facilitate enhancing these areas for biodiversity during the lifetime of this Plan. All proposals within the 'recreational/amenity/green space' zones should include an Ecological Impact Assessment at a minimum to ensure that impacts on protected species and habitats are assessed.

The Department would like to draw attention to the proposed zoning of tourism objectives at Newtownforbes and Lanesborough, noting the proximity of these objectives to Natura 2000 sites. Any proposed zoning objectives near to the Natura 2000 sites should ensure that the proposals are screened for AA.

It is noted that a village walkway is proposed for Drumlish and the Department would recommend that the lighting considerations as already outlined are incorporated with regard to this proposal in terms of impacts on wildlife e.g. bat species.

Climate Change and Natural Heritage

The Department would like to highlight the restoration plans for Raised Bog Special Areas of Conservation (SACs) and Natural Heritage Areas (NHAs), which will occur within the lifetime of this Plan. Some of these designated raised bogs have already been restored such as Ardnagullion Bog SAC under the EU LIFE Living Bog project (LIFE14 NAT/IE00032) and it is envisaged that further raised bogs in the county will be restored and rehabilitated in the future in consultation with stakeholders.

These types of restoration works will benefit the County by providing for increased carbon sequestration which will assist Longford in meeting its climate action objectives. The Department would welcome further consideration in the Plan in relation to the rehabilitation of cutaway Peatlands, noting that the cutaway peatlands have been proposed under CPO 5.137 for wind energy development. The Department does acknowledge that carbon benefit analysis has been included as an objective also (CPO 5.141) in the consideration of wind energy proposals for the future use of cutaway peatlands. Carbon benefit analysis and rewetting/restoration of such areas should be considered when assessing suitability of wind energy projects.

In relation to section 5.8.5.2 Biochemical Processes (Anaerobic Digestion), ecological impacts can occur due to nitrogen (NO_x) emissions from any bio-energy combustion process and ammonia (NH₃) emissions from the spreading of digestate. The impacts of nitrogen deposition on nitrogen-sensitive Natura 2000 sites or Annex 1 habitats outside European sites should be taken into account when considering the location of bio-energy facilities within the county. Impacts of nitrogen deposition include acidification and eutrophication resulting in biodiversity loss. Details of nitrogen deposition mapping and impacts on habitats are included in the Department's latest Article 17 report.

The Department would like to commend the Longford County Council for the inclusion of strong Climate Change Actions noting the specific commitments under 'Natural Heritage and the Environment'.



Observations on the Natura Impact Report.

The Department has the following observations on the draft Longford County Development Plan Natura Impact Report (NIR) which are intended to assist in identifying any omissions or sections which require clarification:

The Department notes that the 15km zone is commonly used in screening for AA and would like to highlight that 'likely significant effects' can occur beyond 15km specifically in relation to River SACs and also to sites designated as SPAs for bird species. The Department recommends that flight collision and barrier risks are considered in the NIR, for example, with respect to the movement of species between SPAs and migratory bird routes across the county. It is important to ensure that development pressure does not inadvertently threaten internationally important bird species protected within or outside the Special Protection Areas in County Longford and the Department recommends that this is assessed in the Plan.

Hydrological interactions have been identified as potential effects in the NIR. The Department would like to highlight that the term 'hydrological' should include both surface and geological hydrological processes which have been shown to be important in the context of more recent scientific research³ on active raised bog habitat, an Annex I priority habitat which is within a number of raised bog SAC sites in Longford.

The Department acknowledges the mitigation measures through CPOs which have been identified in the NIR to reduce or avoid adverse impacts on Natura 2000 sites and would recommend that these mitigation measures are specified for each Natura 2000 site in a clear format. Mitigation measures should be clear, concise and directly linked to the likely impacts identified to avoid significant adverse effects on the Natura 2000 site.

Observations on the Strategic Environmental Assessment (SEA), Environmental Report (ER).

While Article 17 Habitats Directive reports are referenced, the Article 12 Birds Directive reports along with Ireland's 6th National Report under the Convention of Biological Diversity should be reviewed in the preparation of the Plan in the relevant sections under 'existing problems'.

Green, Blue and Peat network infrastructure may also adversely impact on biodiversity if not planned appropriately and the relationship between 'Amenity'/'Broadzone' areas and Natura 2000 sites should reflect the overlap of these areas with designated sites.

³ Regan et. al, 2019. Impacts of groundwater drainage on peatland subsidence and its ecological implications on an Atlantic raised bog.



The Department acknowledges that environmental considerations have been integrated into the Plan and mitigation measures provided in the SEA, ER link the draft Plan provisions to avoid significant adverse impacts from the implementation of the Plan.

Conclusion (nature conservation)

The Department would welcome a clear and specific monitoring plan to be included with the Strategic Environmental Assessment report that will clearly outline how it is proposed to record the impacts of the plan's implementation on biodiversity, both in terms of biodiversity loss and biodiversity enhancement during its lifetime.

For example, monitoring of nitrogen deposition impacts on Natura 2000 sites within the draft Plan's zone of influence in the SEA, is recommended, as research in this area is expanding.

This type of monitoring during Plan implementation will allow for corrective action and intervention if environmental damage is noted. It also provides for a learning opportunity for practitioners and decision makers for future land use plans. The CDP has been subject to environmental assessments including Strategic Environmental Assessment.

While monitoring can use existing sources of information including data collected by other government departments or agencies, the loss or enhancement of biodiversity due to development can only be adequately monitored and recorded through the planning process.

The Department would welcome the publishing of monitoring reports and would be happy to provide nature conservation observations on the reports.

The Department would again like to acknowledge the important nature conservation objectives which have been included in this draft Plan, to protect and enhance the natural heritage and environment in Longford.

The Department is available to assist in clarifying any of the observations raised in the submission should this be of further assistance.

You are requested to send further communications to the Development Applications Unit (DAU) at manager.dau@chg.gov.ie, or to the address below.

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Michael Murphy,
Development Applications Unit