

## Heritage Ireland 2030

Submission by

ICOMOS Ireland

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## Introduction

ICOMOS Ireland welcomes the development of a Government Policy and National Plan for Heritage for Ireland. This is considered a significant expression of commitment to the country's heritage – cultural and natural. We support and advocate for an ambitious, progressive and inclusive Plan which reflects a contemporary understanding and approach to heritage.

We also acknowledge the open consultation process facilitated by the Department of Culture Heritage and the Gaeltacht (DCHG) in preparing this plan and are pleased to have been active in this. The process has provided an important opportunity for discussion, debate and reflection which has brought a broad range of stakeholders, interest groups and interested citizens together in a variety of forums. This, in itself, can be considered a meaningful and serious expression of the importance which society in Ireland places on its heritage.

The context in which this policy is being developed and in which it will be implemented is considerably different to that of the last Heritage policy. The implications of Climate Change, changing demographics and, a post-Brexit environment, are shaping the country in quite profound ways. Heritage will be affected by these shifts and will increasingly need to play a role in how Ireland can adapt and evolve successfully.

Our submission is informed by the following:

- The international context of ICOMOS, a global body of expertise in cultural heritage, underpinned by an evolving series of Charters, conventions and declarations on matters relating to cultural heritage which have informed and guided best practice in cultural heritage over the last 50 years
- ICOMOS Ireland Members workshop held in January to inform this submission
- Input from our National Scientific Committees/Working Groups covering World Heritage; Energy, Sustainability + Climate Change; Education and Training; Cultural Landscapes; Cultural Tourism; Industrial Heritage; Intangible Cultural Heritage; Historic Towns and Villages; Vernacular Heritage. A number of these NSCs have provided specific submissions which are included in this document.

Heritage is the bedrock of our culture from which the arts are created giving us our unique identity which is dynamic and evolving. Heritage Ireland 2030, provides the context for the Government to articulate an understanding and valuing of Heritage which acknowledges it's importance on multiple levels: in connecting people across generations and diverse backgrounds, bridging the past and the future; enabling creativity and, as a key driver of sustainable development and social cohesion. Thus valued, Heritage Ireland 2030 can also set out the conditions for greater Government commitment to enable, support and resource Heritage in Ireland.



## PART ONE

### 1. Heritage – meaning, understanding and interpretation of heritage in the contemporary world

*“cultural heritage consists of the resources inherited from the past in all forms and aspects – tangible, intangible and digital (born digital and digitized), including monuments, sites, landscapes, skills, practices, knowledge and expressions of human creativity, as well as collections conserved and managed by public and private bodies such as museums, libraries and archives. It originates from the interaction between people and places through time and it is constantly evolving. These resources are of great value to society from a cultural, environmental, social and economic point of view and thus their sustainable management constitutes a strategic choice for the 21<sup>st</sup> century”<sup>1</sup>*

The Heritage Act, 1995, identifies “monuments, archaeological objects, heritage objects, architectural heritage, flora, fauna, wildlife habitats, landscapes, seascapes, wrecks, geology, heritage gardens and parks and inland waterways” as forming part the national heritage

Heritage Ireland 2030 needs to articulate an understanding of heritage which properly addresses the breadth, complexity and nuances of heritage, the dual nature of inheritance – that which we have inherited from the past, and that which the future will inherit from us. *“Heritage is more than monuments, towns, townscapes, landscapes, seascapes, artefacts, collections, tourism and economy, though it is each of these. It is about people, creation, interaction, and function – a dynamic process that reflects the legacy, actions and aspirations of people into the future”<sup>2</sup>*. Increasingly it is also a significant component of sustainable development - from the critical contributions of biodiversity through to the social cohesion which heritage can foster in our increasingly diverse communities and, the environmental imperatives of reducing carbon through adaptive reuse of our historic buildings and urban centres.

A policy for heritage, cultural and natural, should recognize and acknowledge this rich make-up and potential.

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<sup>1</sup> Council conclusions of 21 May 2014 on cultural heritage as a strategic resource for a sustainable Europe (2014/C 183/08),

<sup>2</sup> Statement on heritage provided by ICOMOS member as part of January workshop



## **2. What type of policy/Plan should Heritage Ireland 2030 be:**

ICOMOS Ireland recommends that consideration be given for a clear and concise Policy statement on Heritage which is supported by an Action/Implementation Plan. The former to articulate the Government's understanding of heritage, its vision for heritage and to confirm the status of heritage as a public good extending across many spheres of life and Government action. Such a Policy statement would also commit to providing adequate and appropriate structures, resources, protection and promotion of heritage and to ensuring integration across all sectors of Government. The Policy should commit to providing a budget towards implementation of the Action Plan.

The Action Plan should set out quite specific actions with targets, timelines and the resources required. ICOMOS Ireland has suggested a number of actions within this submission.

## **3. The structures and infrastructure necessary to support cultural heritage – at all levels:**

ICOMOS acknowledges that the successful implementation of an effective Policy will involve many players, from the individual citizen to Government level, embracing public authorities, agencies, NGOs and a range of different communities. The relationships and roles between these will need to be more dynamic and open, including leadership and partnership. As such the existing structures and hierarchies that apply to heritage will need to become more flexible, reflecting both the multiple strands of heritage and contemporary systems of operation.

Heritage Ireland 2030 should enable the evolution of these structural arrangements and the policy might set out to review a more effective, dynamic and contemporary structure for cultural and natural heritage which would better reflect its varied aspects and relationships. As part of this, the role of professional expertise within the administrative infrastructure is considered fundamental.

ICOMOS Ireland would be pleased to participate in such a forum.

Heritage Ireland 2030 needs to reflect and acknowledge other areas of Government Policy which it will affect and which affects it. These include, inter alia, Culture 2025; NPF 2040 related policy emanating from this; the NDP 2040; National Climate Change policy; National Biodiversity Plan; Government Policy on Architecture; National Landscape Strategy and, non-governmental policy such as The Heritage Council Strategy, 'Heritage at the Heart' and the RIA's Archaeology 2025 initiative.



Some of the aforementioned policy is under review and development and ICOMOS supports early delivery of new policy, e. g., the Government Policy on Architecture which is very much needed at a time of significant renewal in building activity.

Other policy, which does not exist and which ICOMOS identifies as important to cultural heritage includes:

- Policy for the planning and management of flooding and the impacts on heritage. Principles such as set out in the Dresden Declaration on Flood Protection for Historic Sites<sup>3</sup> should be written into any such policy.
- Policy relating to Historic Urban Areas: To integrate the objectives of the SDGs, relevant European policy (refer to below section which elaborates on this) and allow these to be aligned with the objectives within the National Planning Framework. It is considered a policy for Irelands historic urban areas is critically needed.

#### **4. Aligning with best practice; aligning with Europe and the international context**

Heritage Ireland 2030 should aim to align with the EU Framework for Action on Cultural Heritage which is an outcome of the European Year of Cultural Heritage 2018 and adopt its core principles and pillars<sup>4</sup>.

In taking such a European outlook, Heritage Ireland 2030 should commit to signing the Council of Europe's Convention on The Value of Cultural Heritage to Society (the 'Faro' Convention, 2005). In this regard we draw the Department's attention to recent research carried out by ICOMOS Ireland as part of EYCH, which has identified a number of case studies throughout the island that reflect best practice in applying the principles and spirit of the Faro convention. This research, which we aim to publish shortly, confirms the reality of 'Faro' in Ireland and positive impacts and results which it can bring<sup>5</sup>.

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<sup>3</sup> [http://www.icomos.ch/fileadmin/downloads/groups/vgi/140801\\_Dresden\\_Declaration\\_English.pdf](http://www.icomos.ch/fileadmin/downloads/groups/vgi/140801_Dresden_Declaration_English.pdf)

<sup>4</sup> <https://ec.europa.eu/culture/sites/culture/files/library/documents/staff-working-document-european-agenda-culture-2018.pdf>

<sup>5</sup> The 'Faro' convention highlights the social and economic benefits of preserving cultural heritage as a prerequisite for achieving sustainable development. It broadly defines the common European heritage as covering all forms of cultural heritage put into the context of a shared source of remembrance, understanding and identity. It focuses on the contribution of this heritage to creativity and social cohesion, and to the ideals, principles and values resulting from the experience of past conflicts and efforts to make progress. The convention highlights the link between cultural heritage and the development of a peaceful and stable society, founded on respect for human rights, the rule of law and democracy.



There are a number of other relevant initiatives which have come out of EYCH 2018 which Heritage Ireland 2030 should embrace:

- European Union/ICOMOS Quality Principles; these new guidelines (to be issued shortly for consultation), will be incorporated in future European funding programmes and, as such, are likely to influence all public capital projects where heritage exists.
- Leeuwarden Declaration: This sets out an ambition and vision for adaptive reuse, including buildings and larger former industrial, military and religious complexes
- Davos Declaration: this sets the agenda for high quality-built environments and sees the contemporary and the historic as a single environment.
- Berlin Call to Action: Cultural Heritage for the Future of Europe

These all articulate a shared European stance on cultural heritage with regard to; inclusiveness, diversity, social cohesion, tangible & intangible dimensions; the importance of quality; and, heritage at the heart of sustainable, urban regeneration.

## **5. Resourcing, Funding and Enabling HI2030**

The Policy should articulate that Heritage is a public good and is nurtured by a broad range of stakeholders. This requires different types of support. The consultation document speaks primarily to the public and community-group stakeholders, the final document needs to embrace these *and* the private dimensions, acknowledging the different requirements.

Generally, support for heritage is needed in a number of ways:

- Ensuring the right skills and expertise is available and implementing programmes for upskilling, ongoing training, CPD, etc, along with advocating for standards and accreditation schemes
- Ensuring there are sufficient professional resources – in terms of skills and numbers, in the places needed. Heritage is implicated in increasing areas of policy, from Rebuilding Ireland, to the National Biodiversity Plan, to Climate Action, and this requires the relevant skills to be available and active at local authority, regional and national levels.
- Increased funding combined with targeted fiscal measures will be necessary to meet the demands of this increasing policy responsibility.



The ultimate cost of not investing adequately in heritage as an ongoing commitment is to place a much greater burden on society and government down the line. This is witnessed, for example in the legacy of having let so many historic town centres and their buildings decline and become vacant. Now, when Government policy is trying to bring these places back into active use, the associated costs are far greater than had their ongoing maintenance and use been supported.

## **6. Cultural Heritage, Climate Change and The Sustainable Development Goals 2030 (refer to specific submission by NSCES+CC in Part Two)**

Climate Change requires new ways of operating and much greater cross departmental, agency and society collaboration. Thus, climate change should – if other reasons be unable – lead a way to more advanced structures for cultural heritage.

With regards to the Sustainable Development Goals 2030 the policy needs to address the role of heritage in meeting these goals. In the SDGs heritage is recognised as significant component of sustainable development and is relevant across a number of Goals. ICOMOS Ireland supported DCHG last year in making a submission on Target 11.4 (“strengthen efforts to protect and safeguard the world’s cultural and natural) to Ireland’s Voluntary National Review to the UN. Heritage Ireland 2030 should commit to an ongoing engagement with the SDGs and VNR process, the shared timelines of both, 2030, serves as a useful target for measuring achievements.

The combination of good maintenance and adaptive reuse of our existing buildings, brownfield and former industrial sites and, historic urban centres, should be acknowledged in Heritage Ireland 2030 as an expression of how, when handled well, heritage can contribute to a sustainable future as well as being relevant to current needs. This aligns forcibly with the National Planning Framework 2040 and it is these kinds of overlaps which should be identified and supported, particularly in urban regeneration and housing.

## **7. Skills and capacity – training, profiles, competencies, accreditation (Ref ETNSC Submission in Part Two).**

Issues under consideration here are:

- The promotion of better knowledge, deeper understanding and wiser communication.
- Acknowledging the need for standards and the need for training and education to meet these,



- Putting in place the positions, infrastructure, career paths and ensuring the proper resources are in place in order to implement the various policy objectives of government which implicate cultural heritage in their successful delivery.
- Skills are essential at all levels – Leadership and management; Professional; Practitioners; communities and citizen guardians of our heritage.
- Heritage Ireland needs to support traditional building skills which may not conform to conventional systems of training and accreditation.

## 8. Cultural Tourism

Heritage and culture are implicitly linked. In 2017, over 4 million holidaymakers to Ireland said that interesting history and culture was an influence when considering Ireland as a destination of choice indicating the importance of cultural heritage as an attractor to visitors. A degree of reciprocal benefit is emerging as cultural heritage sites can benefit from the revenue generated from tourism, and tourism can ( and does) benefit from the extent and richness of the cultural heritage resource in Ireland. Eighteen out of twenty-one top fee-paying visitor attractions in Ireland constitute of natural and/ or built heritage. These 'attractions' attracted almost 10 million visitors in 2017 (Fáilte Ireland<sup>6</sup>).

Visitors to Ireland come for many reasons. According to research undertaken by Fáilte Ireland, the main market is the UK market where there are an anticipated 6.5 million sight seers and culture seekers. They seek 'exploration, engagement and authentic new experiences' (Fáilte Ireland<sup>7</sup>). The German sight seer and culture seeker, of which there are an anticipated 6.5million in Germany, perceive Ireland as destination with lots of culture. They seek immersion and enrichment, with the age group of 55+ particularly wishing to build knowledge and understand culture. The primary reason why almost three-quarters of German holidaymakers come to Ireland is to explore Ireland's sights and find out about its culture. Visitors from the same segment in France 'want authentic, enriching experiences and to immerse themselves in local culture' (Fáilte Ireland<sup>8 9</sup>)

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<sup>6</sup>2018 [http://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/3\\_Research\\_Insights/5\\_International\\_Tourism\\_Trends/Tourism-Facts-2017\\_2.pdf?ext=.pdf](http://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/3_Research_Insights/5_International_Tourism_Trends/Tourism-Facts-2017_2.pdf?ext=.pdf)

<sup>7</sup>[http://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/2\\_Develop\\_Your\\_Business/3\\_Marketing\\_Toolkit/2\\_Selling\\_to\\_Overseas\\_Markets/SalesConnectToolkit\\_Step1\\_GB.pdf?ext=.pdf](http://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/2_Develop_Your_Business/3_Marketing_Toolkit/2_Selling_to_Overseas_Markets/SalesConnectToolkit_Step1_GB.pdf?ext=.pdf)

<sup>8</sup>[http://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/2\\_Develop\\_Your\\_Business/3\\_Marketing\\_Toolkit/2\\_Selling\\_to\\_Overseas\\_Markets/SalesConnectToolkit\\_Step1\\_Germany.pdf?ext=.pdf](http://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/2_Develop_Your_Business/3_Marketing_Toolkit/2_Selling_to_Overseas_Markets/SalesConnectToolkit_Step1_Germany.pdf?ext=.pdf)

<sup>9</sup>[http://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/2\\_Develop\\_Your\\_Business/3\\_Marketing\\_Toolkit/5\\_Cultural\\_Tourism/Sightseers-Culture-Seekers-France.pdf?ext=.pdf](http://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/2_Develop_Your_Business/3_Marketing_Toolkit/5_Cultural_Tourism/Sightseers-Culture-Seekers-France.pdf?ext=.pdf)



The provision of authenticity within cultural heritage tourism can only be delivered by knowledge-rich experiences developed using expertise at local, regional and national levels.

There are sometimes conflicts arising between the objectives for good heritage management and the priorities of tourism development. Striking an effective balance between these can, at times, be challenging.

Addressing 'success' in terms of visitor numbers is a relatively new phenomenon in Ireland and there has been generally limited provision for capacity management at the popular sites. The adverse impacts which arise can be exacerbated by weak processes for engagement and inclusiveness of the communities most affected.

We draw attention to two sources of useful guidance with regard to Cultural Tourism. Firstly, the ICOMOS Charter on Cultural Tourism which was originally adopted in 1976, updated in 1999 and is undergoing review towards a new document to be adopted in 2020. Secondly, the EU has produced Sustainable Cultural Tourism recommendations which come out of the European Year of Cultural Heritage ( [https://europa.eu/cultural-heritage/toolkits/sustainable-cultural-tourism-recommendations\\_en](https://europa.eu/cultural-heritage/toolkits/sustainable-cultural-tourism-recommendations_en) ). This initiative has produced a definition of Sustainable Cultural Tourism as follows:

*“Sustainable cultural tourism is the integrated management of cultural heritage and tourism activities in conjunction with the local community creating social, environmental and economic benefits for all stakeholders, to achieve tangible and intangible cultural heritage conservation and sustainable tourism development.”*

Heritage Ireland 2030 should promote and integrate the guidance and recommendations of these useful documents which point the way forward for sustainable cultural tourism.

## **9. Cultural Landscapes**

Within ICOMOS cultural landscapes are considered a living process that includes many different elements, both tangible and intangible, manifestations of popular culture, traditions, values and customs, that are a testimony of the way in which a society related to the environment in which it was inserted, ultimately witnessing human interactions with nature.

While the primary focus of this submission is on cultural heritage, we also note the many overlaps between cultural and natural heritage. At international level ICOMOS, along with International Union for Conservation of Nature (IUCN), have a joint



initiative, Culture-Nature, which acknowledges the interconnections of cultural and natural heritage and ways to shape sustainable conservation in a changing world.

In June this year ICOMOS Ireland will host a meeting of the Cultural Landscapes International Scientific Committee with Irish and international experts on cultural landscape participating. The discussions and outcomes of this 5-day meeting may assist in framing Objectives for our cultural landscape to be usefully included in HI2030.

The Historic Urban Landscape (HUL), developed by UNESCO is an approach to the management of heritage resources in dynamic and constantly changing environments. It is based on the recognition and identification of a layering and interconnection of natural and cultural, tangible and intangible, international and local values present in any city. According to the HUL approach, these values should be taken as a point of departure in the overall management and development of the city. Last year the DCHG made a report on HUL to UNESCO and it is recommended that Heritage Ireland 2030 should support an ongoing involvement, which might assist in the framing of an urban policy for Historic Urban Areas.

## **10. Industrial Heritage**

- Integrate the Dublin Principles (ICOMOS-TICCIH Principles for the Conservation of the Industrial Heritage 2011) as one of the national heritage policy principles into the future strategy of the Department, and the heritage sector.
- Develop policy on future use / adaptive reuse of brownfield sites in accordance with the Dublin Principles.
- Develop a strategy for Industrial Heritage, similar to that prepared by Historic Environment Scotland in 2015, and one currently underway by Historic England.
- Industrial Heritage National Survey - Carry out a scoping review of Industrial Heritage site coverage in NIAH, ASI and Heritage Council / Local Authority Surveys, together with recommendations.

## **11. World Heritage**

ICOMOS Ireland's specific recommendation on World Heritage have been prepared by our World Heritage Reflective Working Group and are included in Part Two.



## Some Specific Actions and Recommendations

- A national heritage Forum with an agenda and remit to contribute to policy implementation. To embrace all layers operating within heritage. This forum would have relationship with both the DCHG and The Heritage Council, as the two primary organs for Heritage in Ireland.
- The policy should incorporate an implementation plan with key actions/deliverables and timeframes. The budgetary and other resources required to implement to be provided. There should be an annual review of progress with a more substantial review every three years.
- An oversight board for implementation of the Heritage Plan which has broad representation including public and non-public sector.
- That Ireland commits to signing the 'Faro' Convention within the life of Heritage Ireland.
- Facilitate enhanced interdepartmental and intradepartmental engagement through specific initiatives.
  - HI2030 to enable the formalising of structures which enable greater collaboration between Culture and Heritage sections of the Department and between the different sections within Heritage.
  - Ensure there is tangible input from all Government Departments in the finalising and implementation of Heritage Ireland 2030.
- HI2030 supports active engagement of the heritage sector at the European and international level – ensuring dissemination in a two-way dialogue. In this regard:
  - Support a Heritage travel bursary, similar to Culture Ireland, which supports international engagement.
- Consideration of a Policy for Historic Urban Areas within the DCHG. (?)
- To support greater evidence-based decision making that the Policy should adopt methods for measuring the impacts of actions on cultural heritage and develop methods and tools for collecting data for cultural heritage statistics<sup>10</sup>.

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<sup>10</sup> the European Framework for Action on Cultural Heritage proposes a pan-European methodology and territorial analysis on the impact of cultural heritage on society, including quality of life (European Spatial Planning Network, EPSON, Study "Cultural Heritage as a Source of Societal Well-being in European Regions"). Such approaches may prove useful and relevant (and place Ireland within a wider international context).



- Increase public funding at national and local authority level for heritage. Without improved (greater) financial support our heritage will suffer and decline. Already we witness this in the condition of many of our historic town centres, in the loss of habitats and growing number of endangered species. Where allowed to deteriorate we simply increase the cost of recovery and repair. A combination of misaligned policy, poor implementation and insufficient funding has exacerbated many of the problems we face today. Heritage Ireland 2030 needs to set out an agenda which seeks to reverse this position. And to present this new agenda as representing the progressive, contemporary values which our changing world demands.



## PART TWO

Specific Responses to Heritage Ireland 2030 (HI2030) Public  
Consultation by ICOMOS National Scientific Committees

**Education and Training National Scientific Committee (ETNSC)**

**Energy, Sustainability + Climate Change National Scientific Committee  
(NSCES+CC)**

**Vernacular Heritage National Scientific Committee (VHNSC)**

**World Heritage Reflective Working Group (WHWG)**



## **Education and Training National Scientific Committee (ETNSC)**

### **Capacity Building**

Investment in cultural heritage training at all levels is identified as a priority action to be resourced through the lifetime of the Plan.

The ICOMOS International Training Committee (CIF) Principles for Capacity Building through Education and Training provide a framework for the development of a training strategy for the heritage sector.

The ICOMOS Ireland 2014 Scoping Review of the State of Conservation Training identified strengths and weaknesses within the present system.

Understanding, conserving, interpreting and championing cultural heritage depends on having competent people with the right skills in the right place at the right time with access to relevant infrastructure, knowledge and data facilities, tools and equipment (both traditional and modern).

As an all-of-government plan it is essential that the content illustrates where other departments align with the cultural heritage brief and identify their relevant training needs.

The key role of the Department of Education and Skills should be clarified and confirmed.

The heritage sector needs to invest in training if it wants to achieve its quality objectives and be able to adapt effectively to changes in the environment, society and economy.

It's strong and complimentary relationship with the creative and tourism business interests and its contribution to the sustainable development agenda should be highlighted in the policy.

If this contribution is to continue, there is an urgent need to ensure that education standards and supply meet the sectors needs and that these efforts are recognised as mainstream requirements.

Accreditation schemes for Building Professionals, (Architects, Engineers, Surveyors) and Contractors are now in operation and it is important that state and private procurement practise acknowledges, supports and integrates this initiative.

The ICOMOS Scoping Review identified a number of other key heritage players that require recognition and accreditation. The main profiles identified were - conservation building skills, heritage managers and interpreters, community animators and, the digital sector.



ICOMOS ETNSC agrees that sectoral collaboration is the key to the delivery of the HI2030 capacity building aims.

Main priorities for sectoral collaboration

- A state supported Heritage Training Forum should be established to advance the heritage sector's capacity building agenda
- Provide support for ICOMOS/DCHG Conservation Training Review
- Public sector organisations should devise and publicly display their heritage strategies, including setting decision-maker competences and administrative capacity; review handling of cultural property to make sure it is managed appropriately and personnel with the necessary skills are employed to evaluate all designated property (archaeological, built, wildlife) and benchmark existing capacity against threshold requirements as are now set out by the RIAI for local and public authority built environment professionals; the State should set standards with DCHG and OPW to the forefront
- ICOMOS acknowledges and would support The Heritage Council's key role in advancing community capacity building through the heritage officer network and its initiative in establishing the traditional building skills group.
- Generate interest in construction hand skills at first and second level education
- enlarge the stone craft apprenticeship and introduce / increase training in conservation in built environment apprenticeships; the OPW could contribute to development of an extra module in conservation and restoration, which attracts credits (ECTS) in heritage skills
- introduce shared apprenticeships with OPW providing the built heritage on-the-job learning and experience
- Department of Business, Enterprise and Innovation should introduce graduate schemes as are currently run by OPW for newly-graduated craftspersons; also focus in OPW professional graduate scheme.
- The construction industry should establish and implement a conservation skills training strategy.
- State organisations should jointly devise and cooperate to use a system of on-the-job training between each organisation to help and support each other bring staff up to the identified thresholds for built environment competences
- private owners and actors in the built environment / construction sector are not visible: HI2030 should support the private sector in acquiring skills which requires resource allocation



- living by learning: grant funding conditions should require liaison or making of project records available to increase circulation of knowledge to the public
- OPW Building Maintenance Service work – should focus on maintenance skills and assist the private sector improve competences by creating internships
- Mentoring infrastructure should be an action of HI2030 between persons and institutions to create a multi-disciplinary scheme which should be a pre-requisite for conservation accreditation; need to answer the question of how / who to facilitate this
  - skills profiles should include mentoring skills
- support training cooperation e.g. between OPW and an NGO/ training organisation: e.g. OPW and BLFI where each contributes respective elements within its means – models, pilots and case studies should be supported and promoted for others to adopt for formal training and CPD
- all third level environment education and training programmes should include a module in heritage awareness
- Policymakers require CPD – for all government departments, public authorities etc., to build awareness as part of the conservation / sustainability agenda
  - third level modules can be packaged as CPD for many professionals, once validated by the relevant professional institutes
  - Provide support for accredited distance learning multidisciplinary “ understanding conservation” modules based on ICOMOS principles.
  - HI2030 should look at emerging profiles
- ‘Champions’ to work and influence within structures would be useful as action of HI2030
  - practitioners are intermediaries between the State and communities and state support should improve the service they offer, e.g. making clearer the quality of the work required of practitioners (understanding of building prep work by practitioner), of local authorities (consistency between LAs on documentation requirements); DCHG statements carry weight
  - HI2030 could assist in developing communications skills which differ between communities and developers

HI2030 should examine grant system for potential improvements: initiate a 2 year process, in which the first year operates a grant-funded appraisal period with successfully appraised project getting priority for grant funding in the 2<sup>nd</sup> year.

Submission coordinated by Paul McMahon, Convenor ETNSC



## Energy, Sustainability + Climate Change National Scientific Committee

ICOMOS Ireland National Scientific Committee on Energy, Sustainability and Climate Change (NSCES+CC) welcomes the publication of the Heritage Ireland 2030 discussion document.

The Minister for Culture, Heritage and the Gaeltacht makes several important comments in the opening forward. In particular mention is made of the importance of heritage as a resource for economic activity and yet the heritage sector remains under resourced both in human and in financial resources. In order to further effective work in energy, sustainability and climate change it is the opinion of the NSCES+CC that this deficit needs to be addressed.

Mention is not made of the greatest challenge we face as a nation will face in the coming decades – climate change. Our heritage is particularly vulnerable and to integrate climate change mitigation and adaptation measures into the Heritage Ireland 2030 Plan, a number of suggested actions for consideration are outlined below.

### Theme 1 National Leadership & Heritage

- Objective 2 It is important that heritage policies and strategies are cross departmental and there should be more encouragement to hold cross departmental meetings and workshops.
- Objective 4 This is one of only two mentions of climate change in the document despite the huge threat of climate change. Consideration could be given to making the proposed heritage plan climate action proof.
- Objective 5 This objective mentions increased investment from an economic return – there are several international reports confirming that for every €1 invested in heritage gives a return of €4.<sup>11</sup>
- Objective 6 Investing in training and skills should be a top priority.

### Theme 2 Heritage Partnerships

The underdevelopment of the Architectural Conservation Officer infrastructure within the local authority system has resulted in missed opportunities to foster important local

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<sup>11</sup> There is considerable research on economic and social value of cultural heritage – a good research reference is ***The Social and Economic Value of Cultural Heritage: literature review*** by Cornelia Dümcke and Mikhail Gnedovsky EENC Paper, July 2013 (<https://www.interarts.net/descargas/interarts2557.pdf>)



partnerships with regard to historic buildings and urban areas and their potential to contribute to sustainable communities and localities. The successful development of heritage partnerships and Theme 3, in particular, will require strong support and expertise on the ground.

Objective 4 To fund and promote more research in heritage is particularly important with reference to the energy renovation of our traditional, vernacular and heritage buildings. The new 'Major Renovation' standard in the forthcoming revision of Part L of the Building Regulations is a significant opportunity to increase the energy efficiency of many existing dwellings of solid wall construction. If incorrectly designed and regulated it could result in a loss of built heritage amongst non-protected historic structures and also introduce unintended moisture-related risks in all historic (protected and non-protected) buildings. European Standard *EN 16883:2017 – Conservation of Culture Heritage: Guidelines for improving the energy performance of historic buildings* should be referenced to guide the renovation process. The heritage sector and the construction industry in general should be well informed on this matter and should be able to guide and support the uptake of appropriate energy efficiency improvements at a local level.

Objective 5 Traditional skills and training has almost vanished from our skillset. This must be a priority of the Heritage Ireland 2030 plan and partnerships with the Departments of Education, DCCA and bodies such as SEAI, OPW and CIF should be explored.

### **Theme 3 Communities & Heritage**

The NSCES+CC applauds this theme as it is desirable that all communities take ownership of their local and national heritage. Within this important objective should also be the role of the expert. Successful outcomes need the local community/private citizen working constructively with relevant expertise.

#### **General Observations on the Discussion Document**

1. The best way to preserve our heritage buildings, structures and sites is through good and regular maintenance, which is omitted from the Discussion.
2. There is no mention of "Adaptive Reuse" of our existing built heritage, as individual buildings and urban ensembles, reuse is a fundamental component towards reducing carbon and achieving energy reduction targets.
3. Whilst there are two mentions of climate change, there is no mention of how improving the energy efficiency our existing building stock would contribute to a very significant reduction in Ireland's CO<sup>2</sup> emissions. Heritage can and must play a contributing role in mitigating climate change. More research is



required to better understand the material characteristics and true thermal performance of our historic buildings:-

4. Consideration be given to the development of stronger links between government departments on joint and collaborative initiatives such as the Living City, Bring Back Homes, Living over the Shop, SEAI's Deep Retrofit Pilot Scheme, etc.
5. Consideration be given to more focused funding support for energy, sustainability and climate change initiatives and programmes.

Submission coordinated by Peter Cox, Convenor NSCES+CC



## **Vernacular Heritage National Scientific Committee (VHNSC)**

### **Address the lack of commitment to evidence-based conservation actions**

Though vernacular building forms a critically important part of Ireland's built heritage, national identity and cultural landscapes, there is, as yet, limited understanding of its materiality and conservation. The destruction of vernacular buildings continues apace.

An Action Plan on Thatched Structures was undertaken in 2003. Sixteen years later, very few of its recommendations were implemented. Further research and dissemination of information to owners, grant-giving agencies, contractors and tradesmen is urgently required.

Research is fundamentally important in order to better understand traditional buildings and structures and the way they work, and essential in informing decisions about appropriate interventions and repair. Education and training is needed for vernacular heritage at all levels particularly in a situation where, as currently the case, there is a skills shortage for traditional building conservation repair.

Lime is a key element in the building and repair of vernacular buildings and its use is mentioned here as an example of a core traditional skill used in vernacular construction. The Building Limes Forum of Ireland (BLFI) has commenced gathering information on the use of hot-lime mortar mixes in various locations throughout the country. BLFI'S recent research on the traditional use of hot-lime mortar mixes suggests that it was probably a typical mortar employed in vernacular buildings historically. Given that the research is predominantly achieved on a voluntary basis, knowledge outcomes will remain limited. Therefore, such research must be supported by the State. Ireland typically looks to UK for guidance, in the conservation of lime mortars and thatch for example. While international networks and information exchanges are invaluable in the conservation of built heritage, vernacular building traditions typically differ in techniques and materials, not only from country to country, but within countries. Locality is a defining factor in vernacular construction. Conservation of vernacular buildings in Ireland, therefore, must concentrate on the individual and collective character of its historic vernacular structures, employing appropriate evidence-based interventions that are both location and structure specific.

### **Retrofitting historic vernacular structures to improve their energy efficiency**

Improving energy efficiency by retrofitting historic vernacular building stock is key to the successful conservation of vernacular buildings. In the case of historic buildings,



grant-giving energy agencies do not appear to have a conservation remit. The age and /or significance of historic buildings is not a consideration in grant conditions so that retrofitting is carried out by general building contractors, without the necessary conservation skills and knowledge. Predominantly based on modern materials and construction techniques, such practice leads to irreparable damage to important vernacular buildings. It is suggested that, in the context of current energy-efficiency retrofitting works, conservation policy and practice is flawed. The great lack of understanding of vernacular buildings means that public money is used to the detriment of historic buildings. Appropriate safeguards need to be put in place when providing (much needed) grants for energy upgrades. It is recommended that, when issuing grants, grant giving bodies, such as the SEAI, should comply with conservation principles on a statutory basis.

### **A National Conservation, Training and Research Centre**

Building on existing strengths, facilities, structures and knowledge is key to progressing a better understanding of vernacular buildings and evidence-based conservation. Placing vernacular heritage in a coherent and practical context is central to ensuring best conservation policies and practices. Coherence and strength can be assured, for example, by a commitment to a National Conservation Training and Research Centre of excellence. Such a centre would be publicly owned, managed and resourced. As a centre of excellence, such a resource would be available to all, including schools, colleges, the public, building owners, apprentices, professionals, and academics.

Submission coordinated by Dr. Fidelma Mullane, Convenor VHNSC



## World Heritage Working Group

ICOMOS is the professional advisor on cultural heritage to the UNESCO World Heritage Committee. It is one of the advisory bodies to UNESCO designated in the 1972 World Heritage Convention. One of its principal functions is the evaluation of nominations made each year to the World Heritage List by State Parties to the Convention. At national level ICOMOS seeks to work with and assist the State Party (Ireland) in the implementation of its World Heritage Programme.

A revised and revitalised National Heritage Plan is welcomed by ICOMOS. An active World Heritage Programme is envisaged and referred to in the Project Ireland 2040 National Planning Framework (NPF) (2018) and Project Ireland 2040 National Development Plan (NDP) 2018-2027 (2018). The National Heritage Plan should build on the principles established in the Action Plan for Rural Development (2017) in realising our rural potential.

The NPF refers to a policy and a programme for World Heritage. The Government of Ireland states that it shall develop a national World Heritage policy as part of Heritage Ireland 2030. ICOMOS interprets this as meaning a specific policy on World Heritage together with strategies for the two existing World Heritage Sites and a plan/strategy for advancing the nomination of sites on the Tentative List. ICOMOS would welcome a formal statement from the Department for Culture, Heritage and the Gaeltacht which details and communicates its World Heritage vision and policy; its programme for implementing that policy, its specific plans for the existing sites on the World Heritage List and its plans for seeking nominations for the inclusion of sites on the revised Irish World Heritage Tentative List, currently open for application.

A key issue is that there is a disconnect between the World Heritage (WH) system and the National Planning system, articulated through County Development Plans, which the Government needs to address. The National Policy on World Heritage should have the capacity to indicate the significance which is attached to World Heritage designation in the context of Planning policy. Clarity on this point will allow the WH system sit more comfortably with National Legislative provisions for Heritage management and protection. In this regard the Department of Culture, Heritage and the Gaeltacht should develop specific guidance for planning authorities on developing local plans to support World Heritage policies. A tool could be developed concerning the attributes of sites, indicating how to identify them more clearly and how to protect them so that the work of the local authority decision-makers dealing with development proposals sit within a particular context.

The Department of Culture, Heritage and the Gaeltacht should indicate its commitment to the development of awareness and understanding about World Heritage matters. It should also be committed to building capacity regarding World Heritage matters at governmental, local authority, professional and community levels



where necessary.<sup>12</sup> ICOMOS Ireland would welcome a specific commitment through the National Heritage Plan from the Department of Culture Heritage and the Gaeltacht to ongoing collaborative engagement and constructive dialogue with ICOMOS Ireland concerning (World) Heritage matters.

The State Party has responsibility for getting the organisational structures in place and for the development of model frameworks for management of and public engagement at cultural sites. Developing an inclusive values based approach is key. The Department of Culture, Heritage and the Gaeltacht should facilitate institutional co-operation for site management for World Heritage Sites and other heritage sites, by invoking good practice. There is an understandable confusion about the WH system, its remit and the different areas of responsibilities which needs to be addressed. An organisational diagram showing responsibilities concerning WH matters could assist to progress this objective.

The upstream changes to the World Heritage process, recommended at international level, seek to embed communities into the plan process, with a view to enabling their legitimate concerns to be heard, to building capacity and to more effectively securing acceptance and implementation of management plans.

ICOMOS Ireland urges the Government to sign the Faro Convention 2005,<sup>13</sup> which promotes a wider understanding of heritage and its relationship to communities and society. Under this Convention, States agree to protect cultural heritage and the rights of citizens to access and participate in that heritage. ICOMOS would like to see the government champion the principles and good practices established by that Convention and support for programmes for meaningful engagement with communities and stakeholders articulated in its new heritage policy.<sup>14</sup> Since the Faro

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<sup>12</sup> This should include devising and disseminating advice on the identification, recognition and protection of Outstanding Universal Value (OUV), Authenticity and Integrity where they might be encountered in Ireland.

<sup>13</sup> Council of Europe Framework Convention on the Value of Cultural Heritage for Society (October 2005),

<sup>14</sup> An example of action in this regard would be the proposed creation of a Management Plan implementation group, the establishment of a Community Forum together with the stated intention within the draft/management plan of appointing a Manager/Coordinator that would work to secure effective engagement with the community, other stakeholders, the local authority and the Department, at the Brú na Bóinne World Heritage Site. ICOMOS considers that appointing the right person to this post is probably the most effective single step that can be taken in relation to protection of the OUV of the WHS. This person should be the key point of contact in relation to the WHS, as well as being responsible for advancing the implementation of the Management Plan. Whilst the foremost purpose of the MP is the protection of the OUV of Brú na Bóinne, it must also assist communities to continue to sustain and develop the area's economy and social cohesion.

There is a recommendation in the 2004 UNESCO report that an officer be appointed with "clear overall responsibility for the management of the World Heritage property at site level". The new Management Plan of 2017 provides for such single individual, a World Heritage Manager/Property Co-ordinator.



Convention is a framework convention, the Government can decide on the most convenient means to implement the Convention according to its legal or institutional frameworks, practices and specific experience.

Submission coordinated by Mona O'Rourke, Convenor WH/WG

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