

23 September 2018

**ICOMOS (Ireland) Submission to the Consultation Draft on the Guidelines for Planning Authorities: Urban Development and Building Heights**

ICOMOS, the International Council on Monuments and Sites, is a global non-governmental organization associated with UNESCO. Its mission is to promote the conservation, protection, use and enhancement of monuments, building complexes and sites. It participates in the development of doctrine and the evolution and distribution of ideas, and conducts advocacy. ICOMOS is an Advisory Body of the World Heritage Committee for the implementation of the World Heritage Convention of UNESCO. As such, it reviews the nominations of cultural world heritage and ensures the conservation status of properties.

Listed below are international charters and objectives that should be taken into consideration in the final drafting of the proposed Guidelines. These should also be considered within the SEA.

- UNESCO Recommendation on the Historic Urban Landscape:  
[http://portal.unesco.org/en/ev.php-URL\\_ID=48857&URL\\_DO=DO\\_TOPIC&URL\\_SECTION=201.html](http://portal.unesco.org/en/ev.php-URL_ID=48857&URL_DO=DO_TOPIC&URL_SECTION=201.html)
- ICOMOS: Valletta Principles for the Safeguarding and Management of Historic Cities, Towns and Urban Areas.  
[https://www.icomos.org/Paris2011/GA2011\\_CIVVIH\\_text\\_EN\\_FR\\_final\\_20120110.pdf](https://www.icomos.org/Paris2011/GA2011_CIVVIH_text_EN_FR_final_20120110.pdf)
- ICOMOS: Charter for the Conservation of Historic Towns and Urban Areas (Washington Charter) <https://www.icomos.org/en/what-we-do/focus/179-articlesen-francais/ressources/charters-and-standards/159-charter-for-the-conservation-of-historic-towns-and-urban-areas>
- UN Sustainable Development Goals - Goal 11: Make cities and human settlements inclusive, safe, resilient and sustainable. Target 11.4: Strengthen efforts to protect and safeguard the worlds cultural and natural heritage
- UN *Good Practices of Accessible Urban Development – Making urban environments inclusive and fully accessible for ALL*  
[http://www.un.org/disabilities/documents/desa/good\\_practices\\_in\\_accessible\\_urban\\_development\\_october2016.pdf](http://www.un.org/disabilities/documents/desa/good_practices_in_accessible_urban_development_october2016.pdf)
- UN New Urban Agenda - Habitat III <http://habitat3.org/wp-content/uploads/NUA-English.pdf>
- The Burra Charter for Places of Cultural Significance
- [Joint ICOMOS – TICCIH Principles for the Conservation of Industrial Heritage Sites, Structures, Areas and Landscapes – 2011](#)
- UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage  
<https://ich.unesco.org/en/convention>
- Guidance on Heritage Impact Assessments for Cultural World Heritage Properties - [https://www.icomos.org/world\\_heritage/HIA\\_20110201.pdf](https://www.icomos.org/world_heritage/HIA_20110201.pdf)

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## COMMENTS

- Reuse: We recognise that current pattern of development of Ireland's cities and towns is unsustainable. We welcome the proposal for intensification of our urban cores. But it is not just a question of taller buildings. The emphasis on height, plays down the underuse of much of the existing building stock in such areas. The problem of many our towns and cities is the abandonment of the urban core for peripheral development. Reuse of building stock, for residential and commercial use, must play an important role in future sustainable development, both for intensification of use and the embodied energy of existing buildings.
- Receiving context: Many of the structures which make up the core of our towns and cities are designated as National Monuments, on the Record of Protected Structures, or in Architectural Conservation Areas. Key streets in cities like Dublin are often aligned on landscape or architectural features such as the Dublin Mountains or the Wellington Monument. Assessment of potential impact of new development on the character of such areas or views should be made by a competent architectural conservation professional.
- Area Density: Density is sometimes confused with height. Building heights may be low, but the density high. In the Development Plan and Local Area Plan processes, Local Authorities should be required to provide figures for existing densities of areas and neighbourhoods, to inform evidence-based decision making on optimum densities for areas identified for intensification. It should also be kept in mind that height is relative - ten storeys in a two storey area is tall, but ten storeys in a seven storey area is *higher*. Impact is significantly different. It should also be noted that Kensington, in London, where building heights are typically seven stories in height, is one of the most dense urban areas in the world. Individual tall buildings set in open space, do not produce dense urban areas. These guidelines would be more effective if they considered density of urban areas rather than building height.
- Planning: The objective to intensify our towns and cities will put significant new pressures on our planning system. It will need to be adequately resourced with the necessary skills in architecture, conservation, cultural heritage, including intangible cultural heritage, urban design and landscape architecture as well as land use planning. Integrated, appropriately skilled multi-disciplinary teams working within the planning authorities are required to carry out the necessary area-based mapping and subsequent development, implementation and monitoring of appropriate area plans and policies including architectural conservation areas.
- Gated developments should not be permitted within the core of towns and cities as they act as blocks on the permeability of the urban block, inhibitors of the public realm. They also inhibit ease of access to transportation and other facilities, which must be the corollary of higher density urban living, for a successful policy.

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- Heritage Impact Assessment: The SEA proposes as a mitigation measure “*Include a specific requirement to undertake a cultural heritage impact assessment (including archaeology and architecture)*”. The Draft Guidelines do not include this requirement in the Development Management Criteria. This should be included as recommended in the SEA and is in line with all current good practice guidance and procedures for the protection of historic urban areas of cultural heritage importance.
- SEA: The SEA contains a number of shortcomings in its consideration of cultural heritage which are of concern as to their consequential impact on the Guidelines as currently drafted. The consideration of Part IV of the Planning and Development Act which provides for both protected structures and statutory architectural conservation areas is considered insufficiently weighted, in particular given that all the central urban areas which these guidelines relate to are historic urban areas with a significant component of designated protected structures, architectural conservation areas and other areas which are of cultural heritage value, including tangible and intangible components. Part IV of the Act is not explicitly mentioned and architectural conservation areas are inadequately considered. The SEA has omitted Dublin – The Historic City of Dublin from the sites currently on Ireland's World Heritage Tentative List.

ICOMOS Ireland request that the above observations and comments are taken on board in any final guidance which the Department might consider publishing.

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