



‘Places for People’: Ireland’s National Policy on Architecture from 2020’

Draft response to the public consultation of the Heritage Council – subject to formal approval by the board of the Heritage Council

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Recommendations

- 1) The 'Places for People' consultation should yield a Department of Culture, Heritage and the Gaeltacht policy that addresses the Historic Environment, not just 'architecture', and that references the *National Landscape Strategy* and *Climate Change Adaptation Sectoral Plan for the Built Heritage and Archaeology* as its complements.
- 2) The implementation context for the new policy should be clarified to ensure that it answers the questions posed above
- 3) The Heritage Council, properly resourced, can play a crucial role in enhanced action to deliver the Government's Policy on Architecture, and the historic environment.
- 4) The new policy should aim for
 - i) the full utilisation of existing buildings (especially houses),
 - ii) an adaption plan to reduce energy use in all buildings, in accordance with the government's Climate Action Plan, and
 - iii) State support for the promotion of a widespread and improved ethic of care and maintenance of our building stock
- 5) The new policy should incorporate the almost-complete skills agenda for the built environment already undertaken by the Department of Culture, Heritage and the Gaeltacht, and link to and support other existing initiatives in this area
- 6) The new policy should support quality assurance in procurement process be modified to make use of quality registration schemes such as the Heritage Contractors Register.
- 7) An Historic Environment policy, emerging from the 'Places for People' consultation, must impact on planning policy and procedures, as this is the established system in which the most significant decisions about our built and historic environment are made. It could:
 - i) Be more demanding that existing buildings are re-used to maximise the retention of the carbon content of their structure and internal material content,
 - ii) Engage more fully with the protection of the architectural heritage, in line with Granada Convention undertakings, through the employment of a full complement of Architectural Conservation Officers, and also the extensive and sensitive use of the protection powers entrusted to it for both individual structures of special interests, but also for the character of areas, and Local Authority Historic Buildings Committee, as proposed in the previous policy
 - iii) Improve the quality and number of the consultative procedures it is capable of to gain community legitimacy for the long-term, sustainable management of places, especially to develop climate resilience for special or especially-vulnerable places
 - iv) an 'Architecture' policy also needs to be an 'urban' policy, addressing the way our towns, cities and villages are used, managed, and improved
 - v) Planning for sustainability means making more long-term plans, which permit communities to envision what their place will be like in 10, 20, or 50 years time, and that these must be acknowledged and recognised as valid ways to plan that take people's and communities' viewpoint into account.
- 8) The Department should recruit landscape architecture expertise to implement the National Landscape Strategy.

- 9) Engagement with people and communities about 'architecture' and the historic built environment should take place through local authorities through networks similar to and equivalent to that of Heritage Officers.
- 10) The new policy should aim to re-frame an ethic for built environment practitioners to quality in building, respect for the inherited historic environment, and environmental sustainability.
- 11) Taking into account the vernacular ideal of autonomous agency of self-sustaining traditions, the State should use respectful procedures and financial supports for vernacular traditions, and the informal, and peer-to-peer transmission of skills. The State should seek out and support a wide variety of ways for craft skills to be transmitted, even if these cannot be accredited.

Introduction

The Heritage Council is pleased to contribute to this important initiative to re-found the Government's policy on the built environment, noting that the historic built environment is an important and dominant component of the world we live in. In a world preoccupied by climate change, and biodiversity loss, an architecture policy can make an important contribution to reducing and avoiding carbon emissions by respecting the stores of carbon locked up in existing buildings that are serviceable for continued use. It is clear that the adaptive re-use of buildings will become a component of climate policy that will acquire only greater significance as the crisis deepens. The strategies of conservation that the Heritage Council has advocated since its inception continue to have a role to play in mainstream policy in relation to the built environment.

The 2020 Government Policy on Architecture should reaffirm the Government's first, foundational, formal policy statement on architecture of 6th May 1997:

"In pursuing its policy on Architecture, the Government will:

- i. Promote the highest standards of design and construction in building works for which it is responsible and support the pursuit of high standards of building*
- ii. Develop an organisational framework which facilitates the application of knowledge and skills concerning the built environment;*
- iii. Ensure that the architectural heritage is conserved and maintained to a high standard;*
- iv. Foster the demand for high quality architecture in the community as a whole;*
- v. Promote the concept of sustainable development;*
- vi. Encourage innovation in architecture."*

The forthcoming initiative, like the last¹, will attempt to take action and provide support to this statement. As with the last policy, which in its title refers to the future achievement of sustainability, environmental concerns will, more than ever, inform action to be taken now in relation to buildings. Environmental sustainability in building (objective v) can be most effectively achieved by conservation and adaptive re-use of buildings (iii). The values-based approach that has been the new norm in built heritage conservation inevitably leads to qualitative critical thinking (iv) and drives the demand for building construction knowledge and skills (ii). The Heritage Council, in this light, which has been so engaged with these issues, and which has acted in concert with the built heritage conservation sector, can make a considerable contribution to the achievement of the results that government policy aims for, if it is resourced to do so.

Today, within a broad socio-economic context of difficult resourcing and significant social, technological and climatic change, Ireland's historic environment faces challenges. There are actions that we can take now to maintain and enhance the management of our historic environment in the face of such challenges, to ensure that we continue to maintain the significant value which Ireland's historic environment brings. Fully utilising existing buildings (especially houses), adapting all buildings to reduced energy use, and disseminating a widespread and improved ethic of care and maintenance of our building stock are the most environmentally strategic objectives a new policy can set out to achieve.

The following will address the five key themes recommended as a framework for the consultation, but with greatest emphasis on the first three.

¹ *Government Policy on Architecture 2009 – 2015: Towards a Sustainable Future: Delivering Quality within the Built Environment*, Department of Environment, Heritage and Local Government, 2009

- Designing for climate resilience and sustainability
- Designing quality places for public benefit
- Respecting our past, shaping our future
- Leadership
- Knowledge and innovation.

Terminology: Architecture – the Built Environment – The Historic Environment – Landscape

Buildings collectively become the environment we live in. This is long-lasting, and the time depth of our surroundings adds meaning and richness to our lives. The built environment is therefore also the historic environment. It is ‘the familiar and cherished scene’, the backdrop to our everyday lives. The values of the historic environment are multiple, in bearing witness to the lives and creativity of our forebears, the sense of who we are that is central to heritage, a direct utility and also by providing attractive resonances and services to society. It forges connections between people, often without us being much conscious of it. Having a next-door neighbour, for example, is not designed or intended, but forges social bonds. Identity with place, and a ‘Sense of Place’, are the engine of local attachment, and at the heart of sustainable communities. Good building – ‘architecture’ – is the way we invest in maintaining good places, the places that can sustain our lives and allow our society to evolve positively. But the built environment is not just created by architects. ‘Design’, whether conscious or unselfconscious, is the starting point of an evolution in the making of every single place, and includes what people make of buildings after they are built and in the long period of their use. The quality of our built environment also depends on the subsequent contributions of inhabitants or users, and include the living plants and even the shape of the land that surrounds them. Collectively these tell the story of the past, and also bring it right up to date.

The historic environment comprises a variety of objects, structures, landscapes and features, composed into the experience of a seamless flow or whole. It is important in its own terms, and also in helping to create civic identity and physical and social wellbeing. It benefits community participation, lifelong learning, tourism and the economy. It is not detached from life but is ever-changing; that dynamism demands sound and thoughtful stewardship.

For the people of Ireland to continue to gain real, and increasing, benefits from their historic environment, it needs to be understood, valued and championed. This needs to be recognised in a policy not just for ‘architecture’ but for the built environment; not just for the built environment, for the public realms created and managed by landscape architects, and the landscape beyond. In summary, the totality of the historic environment. Making a policy that takes this more holistic approach is a means of achieving the aims of the already-adopted *National Landscape Strategy for Ireland 2015 - 2025*. Thus, the built or historic environment are more holistic concepts than ‘Architecture’, because they necessitate that we think about all the people who need and use buildings through their long and socially useful timespans.

As a practical example, Council’s *Fundamentals of Energy Renovation for Traditional Buildings: CPD Lecture Series 2019-2020* initiative was addressed to architects, engineers and building surveyors, as the three groups of professionals with a competence to specify works relating to climate-proofing buildings. A policy that concerns itself with the historic built environment should not be focussed on one profession only. For this additional reason, the title of the policy should be broadened.

Implementation and context

The policy needs to set out with clarity the administrative context in which it will be implemented. This requires answering the following questions:

- i. What parts of government are going to implement this policy?
- ii. What partners are the government actors going to seek outside of government to implement this policy?
- iii. What will an 'Architecture' policy do (*i.e.* spend money on?)
- iv. What other policies will it impact on (*e.g.* Planning policy – but how exactly? See below for some suggestions)
- v. Is it about 'Architecture', 'the Built Environment' or 'Places'? (Note that these terms set out in this order are arranged on a spectrum leading away from the profession of architecture. See below)
- vi. What components of the policy are already in place or in progress? (*e.g.* The Department's related policies - *Heritage Ireland 2030*, *Climate Change Adaptation Sectoral Plan for the Built Heritage and Archaeology* (CCASP), *National Landscape Strategy, 2015 -2025*, a draft Vernacular settlement strategy, a draft Traditional Skills Action Plan. In addition, The National Planning Framework expresses a commitment to a high-quality built environment, and should cross-refer). In what is clearly a crowded policy landscape, with complex patterns of implementation and scarce resources, this process needs to be clear as to what it seeks to achieve and how it will add value.
- vii. What initiatives already work, *e.g.* –
 - a) National Inventory of Architectural Heritage (a process)
 - b) Sources of information or interaction like Heritage Ireland / archaeology.ie / HeritageMaps.ie
 - c) 'Engage with Architecture' project
 - d) Work of IAA, IAF, AAI, etc.
- viii. How do citizens (not just clients, or members of the public as consumers of entertainment or opinion journalism) engage with 'Architecture'?

(The most obvious answer to this is in the public realm, in streetscape and townscape, which are protected as such as Architectural Conservation Areas, which are subject of the discourse of the land use planning system. But further engagement is possible, through organised action, for example through Civic Trusts, amenity organisations like the Irish Georgian Society, An Taisce, and resident's associations and other community groups)

Skills to build

The historic environment is a combination of physical enduring things (tangible) and the things we do to bring those things into existence, or to take care of them because they exist (intangible). The activities, which only become visible when they are happening – the building process on site, its maintenance and repair using traditional craft skills, the functioning of a building in use, or celebrating our built heritage, as Council facilitates during Heritage Week – are just as important. People's engagement with buildings, the daily minute modifications, DIY maintenance, the make-overs, as well as the more formal building works projects, should all be recognised as a 'tradition', in which skills

crucial to the well-being of society are transmitted; and this transmission is both formal and informal; and that both are important to buildings and building (a verb).

The construction industry as much as the architecture profession is the overt subject-matter of the Government's 1997 *Policy on Architecture*. Policy initiatives and action in 2020 and the future should address itself not just to the achievement of excellence in design, but also in construction, and should therefore foster the development of construction skills. Many policy recommendations and initiatives have already been made for this most difficult area. The Heritage Council has been advocating in this policy area for many years, and would point to the following documents and initiatives that it has taken or supported:

- The Register of Heritage Contractors is a quality brand for construction conservation firms with a growing reputation, and an important role in reflecting industry needs in procurement, skills and accreditation
- In 2009, the National Heritage Training group published a '*Traditional Building Craft Skills Needs Analysis of the Built Heritage Sector*', which contains unachieved recommendations that still remain relevant,
- The Heritage Council ran a Traditional Building Skills Working Group from 2012 to 2016, and now has a Traditional Building Skills initiatives project manager working on contract
- In 2015, Council published '*Research on the Irish labour market in construction conservation*', indicating how the employment structure of the construction industry necessitated a new way of thinking about construction skills education,
- In the UK, the Sustainable Traditional Building Alliance published '*Responsible Retrofit of Traditional Buildings*' (2012) which also indicates the nature of the problems to be addressed for this upcoming programme²
- The Department of Culture, Heritage and the Gaeltacht has circulated a draft *Traditional Skills Action Plan*³ which deserves to be incorporated into this initiative
- The Heritage Council has run a CPD Lecture Series for architects, engineers and building surveyors⁴ entitled *Fundamentals of Energy Renovation for Traditional Buildings: 2019-2020*. Whilst this has focussed on the specification of works, it could not ignore the issues of on-site workmanship.

The quality of the built environment, whether new building or the maintenance of the historic environment, depends on the availability of the skills, competence and capacity to work on it to a high standard. Craftsmanship, workmanship, and competence in building, in construction projects, in the vernacular transmission of skills or in DIY are vital for the attainment and maintenance of quality. They are respectful of the material inheritance, and intangible custodianship of the world. They maximise the role of culture in achieving sustainable development and minimise the impact of the human presence on the biosphere.

It has been characterised as an industry in dynamic disequilibrium, with unstable and ever-changing coalitions of parties assembling on once-off assembly sites to make once-off products, with a kaleidoscope of skill-holders, constraints and rewards:

² available at http://www.sdfoundation.org.uk/downloads/RESPONSIBLE-RETROFIT_FINAL_20_SEPT_2012.pdf

³ *Action Plan for the Development of Traditional Skills and Conservation Education for the Protection of the Historic Built Environment*, Draft January 2016

⁴ The three professions with a competence to specify works to upgrade the thermal performance of buildings

“The professional building industry has a long tradition of craftsmanship, with the worker checking as he (as it has usually been) goes along. However, with the proliferating division of labour, and the fragmentation of legal responsibility, greater reliance ... is now placed on testing and checking. The building industry has an extensive cascade of subcontracting, as well as significant numbers of self-employed and part-time workers. ... As to management, the implications of quality assurance is that more management is done by the worker him/herself.”⁵.

Whilst the anxiety about skills in the building industry is ever-present, Steven Groák’s observation, above, written in 1992, still has the ring of truth, and indicates the intractability of the problem and its embeddedness in the unavoidable context of construction. The forthcoming initiative is an opportunity to address it afresh.

It should be noted that the building conservation sector has felt most acutely the strictures as regards public procurement as they have impacted on longstanding tendering processes. Where these do not recognise the evolving structure of employment in the building industry (the issue of novated and nominated sub-contractors, and of skills transmission through arrangements other than apprenticeship), the difficulties in pricing works in existing structures if contractors are forced to bear all the risk, and the demand that specifications be rigidly adhered to, in place of dialogues between architect and craftsman, which lead to better buildings, the quality of building is diminished.

Council recommends that quality assurance in procurement process be modified to make use of quality registration schemes such as the Heritage Contractors Register.

Links with other determinants of quality in the built environment – the planning system

The Government’s 1997 policy statement acknowledges the importance of the role of the built environment in considerations of quality for ‘Architecture’. The public administration mechanism for determining the quality in this widening context that is the ‘built environment’, outlined above, is the Land Use Planning System. This means that a policy on architecture aimed at improving the quality of output of the development and construction industry must reverberate in this arena, where so many crucial decisions about the form of the built environment are made. An Architecture Policy must change planning policy. The Planning and Development Acts are already dedicated, in their long title, to ‘... provide, in the interests of the common good, for ... Sustainable Development’. The care of the architectural heritage is embedded in this Act and the system that serves it. It could:

- i) Be more demanding that existing buildings are re-used to maximise the retention of the carbon content of their structure and internal material content,
- ii) Engage more fully with the protection of the architectural heritage, in line with Granada Convention undertakings, through the employment of a full complement of Architectural Conservation Officers, the provision of greater financial support through grant aid for the conservation and maintenance of heritage buildings, and also the extensive and sensitive use of the protection powers entrusted to it for both individual structures of special interests, and the character of areas,
- iii) Improve the quality and number of the consultative procedures it is capable of to gain community legitimacy for the long-term, sustainable management of places, especially to develop climate resilience for special or especially-vulnerable places

⁵ See Steven Groák, 1992, *The Idea of Building: Thought and action in the design and production of buildings*, a far-sighted review of the evolution of the building industry in the UK, and its research needs.

Something is sustainable if it endures. Things that endure, in turn, are evidence of what sustainability is. Historic buildings and other structures are pre-eminently evidence in material form of the (somewhat abstract) concept of sustainability.

If we are to plan for the achievement of sustainability, as the Planning Act's long title states, in addition to the five-year cyclical provisions for Development Plans, we must devise ways of thinking in longer time frames than this also. Such planning processes are in fact already being undertaken, when communities create a vision for the area that they live in, as for example, in Westport, Tramore, Letterkenny, Ballinrobe, Youghal, and Fethard⁶. In all these towns the Heritage Council has in one way or another supported the generation of long-term visions by community groups who can own and sustain them through periods far longer than a single development plan.

- iv) An 'Architecture' policy also needs to be an 'urban' policy, addressing the way our towns, cities and villages are used, managed, and improved, and
- v) Planning for sustainability means making more long-term plans, which permit communities to envision what their place will be like in 10, 20, or 50 years time, and that these must be acknowledged and recognised as valid ways to plan that take people's and communities' viewpoint into account.

The 2015 *National Landscape Strategy for Ireland* provides a framework in which the Built Environment can be understood in this larger way. This policy should be integrated in its provisions for the development of landscape policies, in particular, in relation to

- 'increasing awareness' of the built heritage element of the landscape,
- 'education, research and training needs', and
- 'strengthening public participation'.

The profession of landscape architecture, integrating natural elements in public space provides a skill-set to negotiate the scale difference between the individual building project and larger spaces. The Department should recruit landscape architecture expertise to implement the National Landscape Strategy.

Climate change adaptation and mitigation and the historic built environment

If we have a Climate Crisis, this should inform the priorities of all government policies including this one. The construction industry is responsible for 11% of all carbon emissions internationally, and therefore '*... the most environmentally benign building is the one that does not have to be built*⁷'. Taking such an insight seriously requires a reorientation of policy, and of the fundamental social role of architecture as a profession, away from new building and towards the re-use of existing buildings as much as is feasible. This places the skills, practices and quality controls that are the embedded practices related to conservation of the built heritage at the heart of a climate-responsible policy.

Furthermore, it requires a fundamental re-valuation of the built environment of our urban areas, with their re-use a high priority because of the conglomeration of environmental benefits that this re-use will entail. Therefore an 'Architecture' policy also needs to be an 'urban' policy, addressing the way our towns, cities and villages are used, managed, and improved, and it needs to be embedded in the

⁶ See *Ballybrilliant*, published by The Heritage Council and the Irish Walled Towns Network, in honouring European Year of Cultural Heritage 2018

⁷ Grammenos and Russel, *Building adaptability: a view from future*, proceedings from the second international conference: buildings and the environment, June 9-12 1997, Paris, Vol. 2. Pp. 19-26

way we make land use decisions in the Planning System. What can an ‘architecture’ policy say about homelessness, about zero-carbon emissions society, that is not more directly a matter for the planning system?

The 1997 document *Developing a Government Policy on Architecture: A Proposed framework and discussion of issues*, provides a thorough founding for linking an architectural policy to sustainable development. This could be re-stated (see Appendix 1).

Goal 4, Objective 1, Action (a) of the Department’s *Climate Change Adaptation Sectoral Plan for the Built Heritage and Archaeology* (CCASP) sets out to ‘*Establish and demonstrate green ways of working in historic buildings, ensuring that the carbon and development of footprint of adaptation measures is case studies considered.*’ (p. 86). The Heritage Council made two relevant ‘expressions of interest’ to the Department of Communications, Climate Action and Environment’s Climate Action Fund call (March 2020).

Both these proposed initiatives indicate how the architecture policy overlaps with climate change mitigation and adaptation actions that can be addressed through inter-linkages with policies and preoccupations in other sectors. The Heritage Council seeks the support of the Department in carrying out these initiatives, and its recognition that they are important and relevant components of the forthcoming policy on architecture.

The initiatives Council is taking in relation to (a) the Energy Renovation for Traditional Buildings (CPD, accreditation, and potential grant scheme) and (b) Carbon Accounting as a Strategic Planning Tool, should count not only as important actions in the Climate Change Adaptation Strategy, but also in the forthcoming Historic Environment Policy. The latter seeks to use the planning system to require building owners to prioritise the use of their existing buildings over new building as a measure to avoid unnecessary carb dioxide emissions from construction.

Goal 1, Objective 1, Action (c) of the Department’s CCASP calls for ‘*Condition assessment of a sample of heritage sites/properties in public ownership*’. This echoes Action 22 of the previous Government Policy on Architecture 2009 – 2015 (Assessment of Existing Local Authority Historic Building Stock), and the synergy suggests that this policy should be carried forward into the new policy, with an emphasis on establishing the (i) architectural, cultural and social value and (ii) condition – even in coarse-grained terms – of the stock of buildings in public authority ownership. This information is of use in terms of climate change adaptation if it is collected and interpreted with such climate-sensitive data as location, degree of exposure, and condition, as clear priorities.

The Heritage Officer of Cork County Council initiated such a project in relation to its heritage assets in 2012:

‘Each asset will require an assessment of its heritage condition, its use (both past and present) as well as any potential for future use and shall also require an assessment of the conservation status of the site (drawing on heritage designations and any previous reports, conservation plans, condition surveys, etc.). The interconnectivity of tourism with heritage will also be a prominent feature in this project whereby each site shall be assessed for future Tourism possibilities ... The Project will also require assessing the potential of any site for local community involvement.’ (excerpt from the brief)

The tourism value dimension is an additional aspect that may be relevant for County Councils.

Goal 3, Objective 1, Action (b) of the Department’s CCASP undertakes to ‘*Review, and continue to build on, existing practice relevant to climate resilience (e.g. maintenance and monitoring regimes, stabilisation and weatherproofing activities, the development of informative case studies)*’. These

should be echoed in the emerging Government Policy on Architecture, and funded or otherwise supported. But, as has been pointed out in that context, such ‘measures ... will require the careful targeting of resources.’

The Heritage Council proposes elsewhere a grants scheme to advance community engagement with Climate Change Adaptation, subject to the availability of funding. Heritage Communities would be assisted to write Conservation Plans to generate a vision for the long-term management of the places they take care of, and to address the challenges to them posed by climate change. This would empower citizens, generate markers for establishing the local value of heritage, and be a vector for providing training to community groups to take care of the architectural heritage and the wider historic environment. It also provides a means for people to engage directly and responsibly with the buildings, places and landscapes that matter to them. This should also be an objective of an Historic Environment policy, emerging from the ‘Places for People’ consultation.

The concept of ‘Resilience’ for built heritage, raised in the CCASP, can only be about people + building partnerships. The building-inhabitant assemblage makes a building capable of being ‘resilient’, but in order to think of buildings as resilient it is absolutely necessary to see people as inseparably bound to them; and that means, in turn, not to speak of building resilience unless particular people (or particular identifiable classes of people) are always considered in relation to them and the processes they are undergoing. For example, a local authority, with its duty to protect the architectural heritage, or the owner with their responsibility to maintain their property, or the inhabitant with their constant presence at or in a building⁸. For ‘resilience’ to be used as a term in relation to buildings and climate change, these must be recognised.

A building is not a ‘*social, economic and environmental system*’ on its own. To have the agency to respond or reorganise, it must be coupled with people. The ‘essence’ (to use the term in the definition) of a building shifts then from bricks and mortar to ‘buildings-in-use’, noting that uses may be symbolic, evidential or representative as well as functional.

In summary, the emerging ‘architecture’ or historic environment, policy should refer in particular to the following actions in the CCSAP:

- 1 (c)** *Carry out a condition assessment of a sample of heritage sites/properties in public ownership*
Discussed above
- 1 (e)** *Assess the vulnerability of a number of heritage assets to the prioritised impacts of climate change (focussing on high-value and/or high-risk sites)*
- 1 (g)** *Monitor atmospheric climate at selected heritage properties*
- 1 (h)** *Monitor ongoing maintenance and repair works undertaken and of emergency response, including costs (where available)*
Maintenance and repair of existing buildings have always been a duty of owners, but will in future be seen to have a public benefit also, and in recognition of this public value, such practices should be given State financial support
- 1 (i)** *Monitor the impacts of climate change on a representative selection of assets for which condition monitoring has been conducted (see Goal 1.c)*
- 2 (b)** *Coordinate with local authorities to ensure that national and regional policy and plans align*
This is highlighted in this submission in relation to Planning Policy. The Climate Change Sectoral Adaptation Plans, and this policy initiative need to be aligned with Planning procedures (in particular SEA), and the National Landscape Strategy
- 2 (c)** *Work with other sectors and local authorities to identify heritage assets within their remit that may be under threat, directly or indirectly, because of climate change*

⁸ Buildings form the backdrop to our daily lives, the public realm, and have a public function that has nothing to do with ownership of the property

- 2 (d) *Inventory existing policies and plans with regard to whether they address climate change*
That policy should be applied to this policy initiative
- 2 (e) *Integrate climate-change adaptation into all heritage-management plans and policies as these are updated/revised*
That policy should be applied to this policy initiative
- 2 (h) *Develop cultural-heritage guidelines for national and regional emergency-response services*
- 3 (a) *Engage with planning authorities to climate-proof planning procedures for heritage properties*
- 3 (b) *Review, and continue to build on, existing practice relevant to climate resilience (e.g. maintenance and monitoring regimes, stabilisation and weatherproofing activities, the development of informative case studies)*
Discussed above
- 3 (c) *Undertake CEA and life-cycle assessment for conservation interventions to address priority impacts under future climate conditions*
- 3 (d) *Integrate climate-change adaptation into all heritage works and maintenance plans*
The maintenance and repair of existing buildings acquires strategic importance
- 3 (e) *Identify and implement practical measures to protect heritage against extreme weather impacts*
- 4 (a) *Establish and demonstrate green ways of working in historic buildings, ensuring that the carbon and development of footprint of adaptation measures is case studies considered*
Discussed above
- 4 (e) *Create guidelines for non-specialists on sensitive adaptation, recovery from climate-change impacts and sustainable reuse and energy conservation in historic buildings*
- 4 (j) *Provide training to supply identified skills shortages and gaps in capacity in relation to the adaptation of cultural heritage to climate change*
- 5 (d) *Develop grant schemes for preventative maintenance, sensitive adaptation and recovery from climate-change impacts, supported by guidance documents*
The maintenance and repair of existing buildings acquires strategic importance
- 5 (d) *Analyse the value of heritage to society, including recreation, health and climate-change mitigation*
- 5 (f) *Create a green heritage award for sustainable reuse and energy conservation in historic buildings*

Consultation workshop organized by the Heritage Council

In preparation for this submission and as an element of the public consultation for the National Policy on Architecture, the Heritage Council ran a workshop on 18th February. It was intended that the workshop would focus on issues associated with the *Respecting our past, shaping our future* theme in the consultation document. And more focussed still, on the role that local authority architectural services (including Architectural Conservation Officers and Heritage Officers), community groups and civil society – all agencies outside central government – could play in the implementation of the policy.

The following themes were raised. An edited version of the invitation to participants that framed the discussion on the day is appended (Appendix 3)

1. Climate Change – adaptation and mitigation – are very important dimensions to this policy initiative
2. A national co-ordinated approach to protect the architectural heritage is needed. Both the architectural heritage, and the vernacular heritage (if different) are important. There is much to be gained by mainstreaming the skills involved in the conservation of the built environment

3. Prioritising the adaptive reuse of existing buildings. 'The word derelict seems to be missing from this document'. Tackling under-use is an important component of a built heritage policy. Effective penalties for vacancy or under-use are important – a vacant sites tax?

Recognition of embedded energy in existing historic stock, alongside their social and identity value, and their beauty: 'We must bring our buildings with us into the future'

4. Encouraging co-operation between agencies and between public authorities and civil society, in partnerships with communities. This policy initiative should encourage organisations to work together, rather than compete. The State needs to be a partner with civil society organisations, not just a grant-giver, or project-funder.
5. 'Architecture' is only one part of the creation of the built environment, and not the only one. This policy initiative should recognise that quality design comes from the ground up, and is not guaranteed by the developer, or the investor.
6. Skills training – professional, managerial and craft. There needs to be a focus on skills for building, both professional and craft, and they need to be respectful of each other and dialogues between the head and the hand ought to be facilitated not eliminated by the contractual and procurement arrangements that the State sets up. And, in addition, proper recognition for training and support for craft skills such as thatchers, lime mortar plasterers, etc. revitalised apprenticeships or their replacement with a structure more apt to the employment structures of the construction industry
7. This policy initiative should provide adequate funding measures for the conservation of the architectural heritage and in addition, the built environment as a carbon asset. Including multi-annual funding, or funding certainty.

It is noteworthy that the 1997 document *Developing a Government Policy on Architecture: A Proposed framework and discussion of issues*, highlighted the importance of 'extend[ing] the support for maintenance given to owners of heritage buildings'. It remains a priority to recognise the public value of maintaining buildings in use and reusing them where they fall fallow, and notwithstanding the difficulties for government in rewarding or stimulating behaviour that ought to be adequately motivated by the logic of asset maintenance by owners.

8. 'Places are for People' yes! This idea needs to pervade all the things that a policy set out to achieve. The designers of places are not their only makers, the people who inhabit them also have a crucial role in their formation and this can and must be incorporated into important decision-making structures.
9. 'Leadership can come from anywhere, it's not dependent on holding a budget'
10. Local Authorities should have adequate staff resources to deal with the building tasks assigned to them, as well as inputs into the planning process, and sufficient people to discharge planning authorities' duties to protect the architectural heritage

The strengthening of the role of ACOs could be achieved through emulation of the arrangements for Heritage Officers (see enclosed Appendix)

11. Planning, making it deliver 'places for people', a better balance to be struck in favour of the quality of our built environment, rather than the role it plays in the economy (construction industry, property development)
12. Urban regeneration should be addressed in this policy initiative. Re-use and adaptation of empty town centres – making a pro-urban cultural change. Living accommodation in our towns. Our cities may need masterplans, or at least long-term visions of what they ought to become,

negotiated in agreement with the people who need them most. The Development Plan cycle appears to be inadequate: is it because it treats the area as a place for investment, rather than for people? We must continue to find ways to implement the UN Sustainable development Goals, including through what we do with buildings, and urban areas.

Including replacing or improving the 'Living City Initiative' tax break

13. Change the narrative of the negative view of historic structures *i.e.* poor energy ratings, cost of repair upkeep to positives such as reuse Repair and Lease over shops for new housing units.

The participants at the workshop were encouraged to make their own submissions to the consultation, and we understand that many of them did.

Local authority architectural conservation staffing levels

As pointed out by the Association of Architectural Conservation Officers, and Rose Ryall in their submissions to the 'Places for People' consultation, there are several good ideas in the Government Policy on Architecture 2009-2015 that remain to be implemented in full:

In-house Architectural & Architectural Conservation Services for each local authority (Action 7). The following table provides a snapshot:

	No. of local authorities with post(s)	No. of people in ACO related local authority posts
One ACO	13	13
2 ACOs	2	4
6 ACO staff	1	6
Vacancies for role	2	(2)
<i>Total sanctioned Architectural Conservation Officer posts in Ireland</i>		23, maybe 25
local authorities with no ACO, nor any plans to have one	13	
Total no. of local authorities	31	<i>Ideal no. of people to properly service the local authority duty to protect the architectural heritage</i> 60

It was estimated at the time of the drafting of *Strengthening the Protection of the Architectural Heritage* that the proper protection of the architectural heritage of the country through local authority posts linked to the planning function would require a staff throughout the local authority system of 55 or 60 personnel. At this time, the current staffing levels fall far short of that.

In addition, the Expert Advisory Committee Report of the Review of the Operation of Part IV of the Planning and Development Act 2000 published in November 2016 recommends the enhancement of staff skills and structures, in particular local authority architectural conservation services with the specific recommendation to 'Improve and augment existing architectural conservation services at local authority level in consultation with all relevant stakeholders.'

Action 44 of the previous policy also recommended the setting up of Local Authority Historic Buildings Committees.

Engagement with people and communities about the historic built environment

Local authorities provide technical and cultural services to the inhabitants of their functional area, and command relatively strong allegiance and identity. Planning authorities provide a deliberative forum, rightly praised as one of the most open systems of public participation internationally, about the development of the physical environment. People are reasonably comfortable raising objections (and support) for development proposals – usually buildings. Planning legislation and practice sets out formal processes of consultation (which could be improved).

For these reasons, they are the best available means of engaging the public in discourses of cultural change or improvement. The experience of the Heritage Officer network demonstrates how the local authority structure can deliver engagement, which is two-way, between the State and communities (see appendix 2). The Heritage Council recommends such extended, well-resourced and empowered policy networks as a means of achieving the aims in relation to cultural change for the built environment that this policy will seek to achieve.

Vernacular traditions

Extending the conceptual framework of this policy beyond ‘architecture’ also suggests that it should include vernacular building, once defined as ‘architecture without architects’⁹. The Department’s emerging ‘National Strategy for Built Vernacular Heritage’ seeks *‘to enhance the prospects for vernacular architecture, settlements and other aspects of the traditional landscape’*. This should be incorporated into the architecture policy document, and provides a further reason for modifying its title and scope.

Consideration of the vernacular as a matter of public policy within the architectural heritage further underlines continuities and unchangingness as key qualities of the built environment. ‘Living traditions’ of taking care of one’s own buildings have been identified and fostered through the Heritage Council’s Glas Traditional Farm Buildings Grant Scheme. Insofar as they exist as autonomous self-motivated practices of taking care of places, they pose the problem of how the State should appropriately intervene to maintain or conserve these relationships between buildings and places. Outside intervention in an autonomous self-sustaining practice needs to be respectful of that practice, and its autonomy, and its stable use of resources. They are an intangible heritage. Interventions and ‘impacts’ (the things that economists like to measure) are inimical to the continuities that vernacular represents. They may, however, be needed to maintain the symbolic and identity value that those outside such systems derive from them. If people come to Ireland expecting to see thatched houses, then there is a sense in which these are part of the national identity and what Ireland is. This needs to be respected and supported without undermining the integrity of the traditions and efforts that people are willing to invest in them.

The State should be clear about how it would spend to support vernacular. Grants is the obvious one, indeed it was the clear and urgent call of the Heritage Officers Training Day in Gweedore in June 2018,

⁹ Rudolfski, B, 1964, University of New Mexico Press, Albuquerque

and one which Donegal Heritage Officer Joe Gallagher responded to by putting in place a miniature grant scheme for the county in 2019. But the problem of supporting thatching¹⁰ is a national one.

In addition, within the construction industry, with its ever-shifting organisational arrangements, it is important to recognise that the transmission of skills often takes place peer-to-peer on site; indeed, this is a feature even of the formal educational systems such as apprenticeship. The State should seek out and support a wide variety of ways for craft skills to be transmitted, even if these cannot be accredited.

Preventative maintenance

The life cycle cost of buildings is becoming increasingly important for an industry that produces 11% of global carbon dioxide emissions. Taking care of and re-using extant buildings is a means of exploiting their embodied carbon and immediately avoiding future emissions. But buildings are systems of material consumption in slow motion:

'It is somewhat meaningless to speak of a building's lifetime. Foundations may survive for a thousand years, whilst the roof structure may be replaced after a thousand months. The sanitary fittings in the bathroom could last a thousand weeks, the external paintwork a thousand days, and the light bulbs a thousand hours. How old is the building? If we recognise the role of continuous piecemeal maintenance, the calculation becomes even more tortuous. It is, however, very worthwhile to discuss the significance of time in building affairs.' (Groák, 1992, p. 105)

A responsible policy on the built environment would invest in the maintenance of these stranded carbon assets by ensuring that the longest span of time possible is exacted from their use. In turn, this requires practices of maintenance, and a change of cultural attitude to buildings of all sorts, to one where routine care of their components is accepted by all.

Architects and their ethical orientation

Would a policy on 'architecture' define the ethical commitments of an architect (or other designer of the built environment) to quality in building (a verb)? Accountancy for embodied carbon, minimisation of energy-in-use, the respectful treatment of existing buildings, including those which have heritage value, the health and well-being of occupants, the elimination of hazardous materials from buildings and sites, making the built environment more generally accessible, non-co-operation in environmentally-damaging building; all these are non-visual aspirations that a society could express regarding the output of the process of designing buildings. None of them are overtly visible in the images of buildings that architects use as the stock-in-trade of their promotion.

Would a policy on 'architecture' aim to achieve excellence in relation to this? If energy minimisation in the course of the use of buildings becomes a societal goal, the answer should be yes. If the reduction of the carbon emissions that the construction industry is responsible for is part of what architects strive to achieve for society, through the projects they work on for their clients, then the answer should be yes.

¹⁰ ... and the repair of clay building, drystone walling, wrought ironwork, etc - in each of these cases informal knowledge and skills relevant to maintaining the built heritage exist and need to be fostered.

Other submissions endorsed

The following submissions to the *'Places for People'* public consultation have been seen and are endorsed by the Heritage Council. They represent broadly similar views about the contribution of the built heritage to the public good that is architecture:

- Irish Walled Towns Network
- Joe Gallagher, Heritage Officer, Donegal County Council
- Michael O'Sullivan, Dunwoody and Dobson, and Chair of the Heritage Contractors Registration Board
- Association of Architectural Conservation Officers
- Rose Ryall, Architectural Conservation Officer, Waterford City and County Council
- Irenie McLaughlin, Architectural Conservation Officer, South Dublin County Council

We recommend them in tandem with the recommendations distilled from this submission.

Conclusion

Defining what buildings are, or do, is not easy:

*'... just how indefinite is our ability to state clearly what we wish our buildings to achieve, especially when they represent a changing in our location, our well-being, our aspirations. The social demand for building is poised between the repetition or acknowledgement of something familiar – but not properly understood – and innovation, something not yet known. ... The ambiguity can be the source of extraordinary richness and complexity, as designers and constructors stretch their ideas and abilities in the pursuit of its solution, but it also provides endemic uncertainty which resonates throughout the building process, through the interrogations of the brief and into the multiplicities of occupation.'*¹¹

'Architecture' can be a way of thinking about building. It is an academic discipline, a world view, a practice, a design skill, an all-consuming passion.

The process of turning an essentially simple human desire for shelter - for solving some sort of problem through building, elaborated into the vast complexity of the construction project, and ultimately resolving itself into the quietness of a place that forms the backdrop of life – becomes the cultural setting of human life. The skills of the architect to think about complexity holistically – a dialectical vacillation between whole and analysable parts – is an important skill for a sustainable society.

Colm Murray
Architecture Officer
The Heritage Council
27th March 2020

¹¹ Groák, 1992, p. 56

Appendix 1

“Architecture and Sustainability

Part of the sustainability ethos in architecture looks to the preferential use, where appropriate, of local resources. The logic at the macro level lies in the conservation of fossil fuels and the avoidance of the associated pollution and global warming. At the local level it lies in favouring indigenous production, with all that this involves for sustaining livelihoods, crafts and trades. In architecture generally, the use of local resources also contributes to regional expression in the use of building materials, thus fostering a sense of place in the built environment.

The Office of Public Works already has a policy of opting or the use of native materials where appropriate. This policy can be extended to encompass local materials and applied also to building activity throughout the public service. Building projects supported by public funds should be designed and built to take account of sustainability criteria. In addition to improving the quality of new buildings procured by the State, the potential for upgrading energy performance and for use of renewable energies in existing State-held building stock, should be explored.

At present there is no broadly accepted methods of assessing the status of materials used in the construction of buildings from the perspective of sustainability. The effect of this situation is to place a heavy burden on the building designer and specifier who may wish to improve the ‘environmental friendliness’ of the materials used in buildings. This suggests a role for the National Standards Authority in providing a lead that would have immediate positive effect on the environmental impact of buildings.

Experience in other European countries has shown the benefits of demonstration projects in extending the understanding of sustainable development in the building industry, the profession and the research community, and in encouraging their active involvement in this area.”

‘Developing a Government Policy on Architecture’, 1995, p. 93

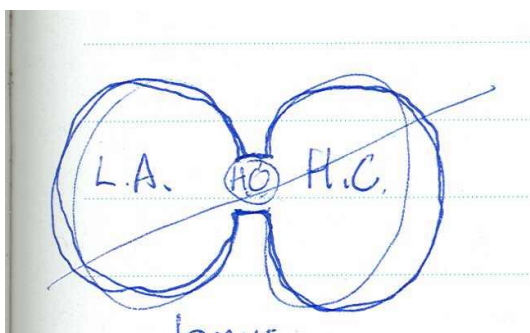
The special characteristics of the Heritage Officer network

The Heritage Officer network, set up by the Heritage Council, offers a valuable model for successful policy implementation. Council has a statutory role in proposing policy to government, alongside a general advocacy role on behalf of heritage. It is encouraged to influence public authorities, including local authorities. By assisting in the employment of Heritage Officers in local authorities, a key network with national oversight and local project implementation capacity was created. The network permits active communications and sharing of experience horizontally among the officers in the network, and vertically between Heritage Officers collectively and the Heritage Council. This permits policy formulation in an environment that is fully apprised of the practicalities of implementation. It facilitates the transmission outwards from the Heritage Council as a policy-forming agency and central government of policy as it is formed, and feedback inwards to government of the difficulties - and also the possibilities - that arise in implementation.

Local authorities are central to the administration of public policy in Ireland. There is a strong public identification with the County unit of administration, a 'region of the mind' that Irish people are comfortable with. Local authorities are democratically accountable through their County Councils for the many services they deliver. Traditionally, these have been technocratic (water supply and drainage, housing, road repair) or quasi-judicial in nature (forward planning and development control). In recent years, local authorities have been asked to take on the role of advocating social change, in the areas of environmental awareness and recycling, building conservation, and the arts. These cultural roles could be characterised broadly as being generically different from the well-established technocratic ones. The local authority provides leadership in asking citizens to change their behaviour for the common good. The Heritage Officer and associated posts such as archaeology officer, field monuments advisor, county archivist or biodiversity officer fit into this new type of function that local authorities have acquired. These roles collectively, and the Heritage ones in particular, enhance the positive role the local authority plays in the cultural life of the community. The benefits of this new approach to social change can be seen most acutely in waste management with the appointment of environmental awareness officers – instead of expensive engineering solutions to waste disposal problems, persuasion to change individual lifestyles through recycling short-circuits the problem. Because this type of low-key, low-cost problem-avoidance approach is new, it is perhaps undervalued, and therefore threatened at a time of budgetary cutbacks, because it is not seen as part of the older core functions of local administration.

Within the local authority, the Heritage Forum, set up by each Heritage Officer, creates a stakeholder group that consists of local heritage special interests, public officials, community interests and elected representatives, which propagates the heritage ethic through policies and projects. This group has 'ownership' of the heritage plan. A selection of proposed projects or 'actions' taken from it are submitted to the Heritage Council for possible grant funding each year. Examples include research or information gathering, inventorying, policy exploration, education and awareness raising with the public, or indeed staff colleagues, etc. Projects are successful only when the Heritage Council agrees that the local initiative aligns with the policy objectives it sets, based on strategic choices within and between sectors, and awareness of

a research agenda or, perhaps, the deficit of conservation good practice exemplars. Whilst this could be viewed as a constraint, it also underscores the gate-keeping role, and indeed influence of the Heritage Officer as a mediator between local preoccupations and national policy priorities. Successful Heritage Plan projects thus work to satisfy a perceived local need alongside a national objective simultaneously, to the benefit of both the national and the local interests.



Workshop on ‘Places for People’ public consultation

Date: Tuesday 18th February, 10.30am -1pm.

Venue: Áras na hOidhreachta, Church Lane, Kilkenny, Co. Kilkenny R95 X264

The Department has asked the Heritage Council to deliver a workshop on one of the themes, *‘Respecting our past, shaping our future’*. This theme is closely aligned with the preoccupations of the heritage sector.

The Heritage Council would like to bring together four stakeholder groups – Heritage Officers, Architectural Conservation Officers, Civic Trusts, and National Amenity societies which have an interest in the built heritage for a focussed workshop on what collective and individual expectations they may have for this policy.

Through this theme the policy wants to ensure that the built environment yields the enduring social, environmental, cultural and economic benefits that the heritage sector continuously works with, and examine how a stable and enduring built environment contributes to the common good - and society’s well-being. In the context of Sustainable Development, and a low carbon economy, the heritage sector might wish to ensure that the slogan ‘the most environmentally benign building is the one that does not have to be built, because it already exists’ might be reflected in the policy and the programme of actions that emerges from it.

As a starting-point for discussion, the workshop could reflect on: -

- How the policy might deal with the continuum Architecture / Built Environment / Place; - ever-widening circles of engagement with larger groups of people.
- Reflect on governmental initiatives relating to the care of the architectural heritage - What have worked? (I would like to get one heritage officer to present an overview of what types of engagement projects related to architecture have been carried out over the years.)
- What kind of partnerships would civic society seek to forge with government departments and agencies to pursue joint aims?
- What aspects of the architecture policy, presumably those focussed on the achievement of quality in the built environment, should be shared with the Land Use Planning system?
- The contribution that the enduring built inheritance might make to a climate-resilient human environment, whilst facing the challenges of lowering energy use

Attendees

Name	Role	Organisation
David Armstrong		Irish Georgian Society
Tom Cassidy	Architectural Conservation Officer (ACO)	Limerick City and County Council
Chris Chapman	Workshop facilitator	
Mary Hanna	Chairperson	Irish Landmark Trust
Grace Fegan	Curator/Manager	Kilkenny Civic Trust
Claire Gogarty		SPAB Ireland
Evelyn Graham	ACO	Kilkenny County Council
Graham Hickey		Dublin Civic Trust
Ivor McElveen	Board Member	The Heritage Council
Colm Murray	Architecture Officer	The Heritage Council

David O'Brien	Board Member	Limerick Civic Trust
Roisin O'Grady	Heritage Officer	Tipperary County Council
Mary O'Brien	CEO	Irish Landmark Trust
Sharon O'Gara	Strategic Projects and Public Realm	Kildare County Council
Nessa Roche	GPA co-ordinator	Department of Culture Heritage and the Gaeltacht
Pat Ruane	ACO	Cork City Council
Rose Ryall	ACO	Waterford City and County Council
Geraldine Walsh	CEO	Dublin Civic Trust
Dr Rose Anne White	CEO	Limerick Civic Trust