



14 November 2025

Senior Executive Officer,
Planning Department,
Meath County Council,
Buvinda House,
Dublin Road,
Navan,
Co. Meath,
C15 Y291

Dear Sir/Madam

Re: Pre-Draft Strategic Issues Paper - Notice of Intention to Review the Existing Meath County Development Plan 2021-2027 and to Prepare a new Meath County Development Plan 2027-2033

The Heritage Council was established in 1995 as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia, in accordance with its functions under Section 6 of the Heritage Act, 1995. The Heritage Council seeks to provide submissions on forward planning, development management and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage.

National Planning & Policy Context

It is important to state from the outset that the **National Planning Framework April 2025** identifies "Enhanced Amenity and Heritage" as one of our national strategic outcomes. Within this, the NPF correctly notes that built, cultural and natural heritage has intrinsic value in defining the character of urban and rural areas, adding to their attractiveness and sense of place. There are several national policy objectives in the NPF 2025 that cover landscape, cultural and natural heritage.

The 4th edition of Ireland's **National Biodiversity Action Plan (NBAP) 2023 – 2030** was published in January 2024. The NBAP states that "local authorities play a key role in biodiversity conservation through the planning system". There are several targets identified under Outcome 2A (*The protection of existing designated areas and protected species is strengthened and conservation and restoration within the existing protected area network are enhanced, regarding designated areas and protected species*) that are relevant for local authorities in their plan making functions. However, of key importance is Outcome 3C (*Planning and development will facilitate and secure biodiversity's contributions to People*). Action Numbers 3C2 and 3C3 are especially important, whereby the objectives of the NBAP are to be aligned and integrated within the statutory land use plans. In addition, actions 1B9, 1C5 should also be key considerations for all plans.

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Heritage Ireland 2030 was published in February 2022 and details a number of action points relevant for local authorities, and these should be included in local area plans. Most importantly are Action 22 - *Introduce policies on supports for urban biodiversity and tree planting*; Action 26 - *Support nature-based solutions for land-use management*; and Action 37 - *Integrate heritage considerations into urban and rural regeneration to ensure that built and natural heritage objectives underpin the planning and development process and inform the 'Town Centres First' policy approach*.

The **Guidelines for Planning Authorities on Architectural Heritage Protection** were developed in 2004 and give expression to the provisions of the Planning and Development Act 2000, with regards to built heritage. Chapter 2 and 3 give detailed guidance on the role of statutory county level plans with regards to the Record of Protected Structures and Architectural Conservation Areas. The Office of the Planning Regulator has also provided guidance on **Archaeology in the Planning Process** through **Planning Leaflet 13**.

Comments on Intention to Review Issues Paper

Introductory Comments

The Heritage Council welcome the *Notice of Intention to Review the Existing Meath County Development Plan 2021-2027 and to Prepare a new Meath County Development Plan 2027-2033*.

We have studied the *Pre-Draft Strategic Issues Paper* provided with this notification. Please note that our submission is divided by theme, and we have identified the relevant questions as posed in the Issues Paper at the top of each section. Our recommended policies and commentary are our response to such questions.

The Heritage Council believes that this is the optimal time to make a comprehensive submission on matters within its remit, as we seek to aid the local authority in its drafting of essential objectives and policies, to ensure that heritage matters are fully provided for in policy in the new county development plan.

Ireland's national heritage is defined in the Heritage Act, 1995 as including: 'monuments, archaeological objects, heritage objects, architectural heritage, flora, fauna, wildlife habitats, landscapes, seascapes, wrecks, geology, heritage gardens, and parks and inland waterways.

Our submission covers matters that both directly and indirectly impact on heritage. These will be divided along the following themes:

1. Strategic Planning, Climate Change and Heritage
2. Natural Heritage (inclusive of biodiversity, ecology, geology)
3. Archaeological and Cultural Heritage
4. Landscape, Public Rights of Way, Tree Preservation Orders
5. Architectural Heritage (including the Record of Protected Structures and Architectural Conservation Areas).

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It is essential that the management of our heritage resource through the planning system is supported by adequate policies and objectives in county development plans. Such policies and objectives need to be robust, implementable, and set out clear expectations of what is acceptable in development management terms.

From the outset, we strongly recommend that each policy should have a clear justification and is evidenced based. This is essential for the 'soundness' of the policy.

In addition, the Heritage Council believe that policies and objectives should be primarily based on setting clear development management expectations. Whilst objectives to achieve an endeavour at a future date e.g. the listing of rights of way, or the identification of county biodiversity areas, may be part of a development plan, the Heritage Council believe that such endeavours ought to be completed as part of the development plan making process as key policies and evidence bases, if of course timelines allow. The Heritage Council are willing to aid as far as practical any evidence base requirements that local authorities may have.

Please note that this is not to say that a county development plan should not include aspirational objectives for specific endeavours that require long time horizons and therefore recognition in the county development plan.

Finally, the Heritage Council believe that plans need to be both accessible and more concise in order to make the planning system more accessible to the public. Currently many county development plans are overly long and may not be easily navigable to the general population.

It is also imperative that policies and objectives get commensurate visual expression in the form of zoning maps and illustrations. Land use zoning and specific designations, ranging from landscape character areas to natural heritage areas etc, should all be accurately mapped as part of the county development plan, with the adopted zoning map linked with the planning application viewer after the county development plan has been adopted.

Strategic Planning, Climate Change and Heritage

Relevant Questions from Issues Paper include:

- *Where do you think new housing should be located without contributing to urban sprawl and ensuring consolidated sustainable growth? (under 'Settlement and Housing')*
- *How should we ensure the protection of the countryside and the regeneration of our towns and villages while providing for sustainable rural housing? (under 'Settlement and Housing')*
- *What is needed to make your town and village a more desirable place in which to live under 'Settlement and Housing'?*
- *What policies should be introduced to further support town centre retail and commercial activities? (under 'Employment and Economy')*
- *How can the plan best promote walking, cycling and the use of public transport, and what improvements can be made? (under 'Transport and Movement')*

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- *How can the Plan best address the challenges of climate change (under 'Climate Change')*
- *Where should renewable energy developments be located given the national targets in this sector? (under 'Infrastructure')*

Efficient use of Land, and Heritage

At the level of first principles negative impacts on natural and cultural heritage are the result of poor and inefficient land use planning. Achieving more consolidated growth will reduce greenhouse gas emissions from the built environment, but it will also ensure that land take is restrained and does not pose undue threats to cultural and natural heritage. In this regard, the Heritage Council strongly support the concept of compact growth, associated brownfield site identification and land activation, and the re-use of buildings, both designated and non-designated, to meet development needs.

Whilst we recognise that it is unlikely that all the housing and development needs of a local authority would be met on brownfield sites only, we do encourage this county development plan to exhaust the potential for brownfield site locations before any greenfield expansion is pursued. Sequentially, it is then essential to ensure that any greenfield release makes efficient use of land, whilst providing the mix of homes necessary, and having densities and facilities that are conducive to public transport roll out, cycling and walking.

Optimising land use in an efficient manner reduces the built environment's footprint which also has benefits for climate action and biodiversity. The Heritage Council is very conscious that climate change is a heritage issue. Several species and habitats are under pressure from climate change, and therefore we support both climate mitigation and adaptation policies in county development plans.

In overarching terms, we encourage the county development plan to achieve the following, through both strategic objectives, policies, and associated mapping/zoning:

- Ensure that transport and land use patterns are strongly integrated, and our settlement patterns are conducive to non car-based transport. Within this context, the identification of land for housing and employment, and other uses should be directed towards existing or future planned transport infrastructure, or in sustainable locations next to existing services and amenities. This is relevant for both multi-house development and single dwellings.
- Avoid sites that have high ecological potential. The identification of sites for development should be based on an environmental constraints analysis with the least sensitive sites preferred.
- Prefer existing brownfield sites and well-located sites within the urban boundary and encourage development around all settlements including smaller "crossroads", "church and school" nodes in rural areas.
- A strategic objective for re-use of heritage buildings, heritage led regeneration and placemaking and conservation through use is needed.
- Increase efforts at pedestrianisation of towns and larger urban areas, and discourage car dominated streetscapes. Strategic placemaking policies are needed to ensure our

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settlements, particularly rural villages and towns “are a place to be, rather than a place to pass through”.

- Promote village and town living and/or cluster development based on high quality design and quality living environments to be achieved by supportive development management standards/policies as an alternative to one off rural housing.

We also recognise the need for renewable energy development and the need to manage flood risk. In this regard we recommend that the policies that provide for such be based on the following fundamental principles:

1. Sites for **renewable energy** generating infrastructure should be identified based on the least environmentally sensitive locations, therefore avoiding in the process important heritage assets, namely ecological and geological designations, high value landscape character areas, as well as important archaeological and architectural heritage sites. Whilst wind speed/energy generation economics, and suitable geotechnical conditions need to be considered, the Heritage Council recommend that avoiding important heritage designations should be the initial first step in analysing sites suitable for wind, solar etc energy developments. Please also see point below on RED III Directive.
2. Any **flood defence measures** should be considered at the entire catchment level in the first instance. There is opportunity to manage flood risk and surface drainage via nature-based solutions, whereby lands liable to fluvial and surface water flooding should be avoided in terms of development, while at the same time natural habitats should be allowed to replenish in these flood plains. Equally the use of nature-based solutions for surface water drainage should be promoted, which can improve water quality and therefore have considerable biodiversity benefits.

Placemaking, Design and Heritage

In addition, every county development plan should have comprehensive design and placemaking objectives. We have provided individual comments under each theme on how natural heritage, cultural and built heritage should inform ‘place’, both in terms of individual scheme design but also in terms of public realm and landscape design considerations. Notwithstanding this, we recommend the following strategic objectives be included in the county development plan.

Strategic Objective X.X - Protect and enhance the built and cultural heritage resource of Meath ensuring that development proposals, both in the wider landscape, and in settlements, are informed by the historic context. Heritage led regeneration and placemaking will be promoted and supported

Strategic Objective X.X - Establish sustainable communities in a manner that consolidates development and amenities within walking and cycling distance, while ensuring that development avoids the most environmentally sensitive sites in the locality

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Renewables Directive III and areas suitable for renewables

The Heritage Council is conscious of the transposition of the Renewable Energy Directive 2023/2413 into Irish law. Within this there are significant changes to permit procedures. In an Irish context this will have significant repercussions for environmental and heritage matters, and how they are considered in planning applications.

Within this directive the concept of “*Renewable Acceleration Areas*” is defined. The Heritage Council is working on the premise that in essence this will be identified in county development plans and regional spatial strategies and may broadly correspond to “*Areas Suitable for Wind Energy*” in existing county development plans. Given the potential for exemptions from Environmental Impact Assessment and Appropriate Assessment requirements, whilst also emphasising that such areas should be free of environmental constraints, the Heritage Council believes that there is an exceptional requirement that the selection of such areas, as part of plan making, is informed by heritage designations and features.

In this regard, a robust evidence base should be established as part of the plan drafting process, where a comprehensive environmental constraints analysis is undertaken, with the view to identify the least sensitive sites for renewables developments. These should avoid important landscape/seascape areas, Natura 2000 sites, NHAs, and county biodiversity areas, as well as cultural and archaeology heritage sites and features.

The Heritage Council recommend that the constraints analysis study be published with the draft plan, with a clear justification demonstrated for the location of sites suitable for renewables.

Natural Heritage

Relevant Questions from Issues Paper include:

- *How can the new County Plan protect and enhance Meath’s existing natural, built and cultural heritage? (under ‘Cultural and Natural Heritage’)*
- *Are there views, trees or locally important biodiversity sites that should be afforded protection as part of the County Development Plan? (under ‘Cultural and Natural Heritage’)*
- *How can the protection and conservation of biodiversity be integrated into the planning, design and delivery of public projects and private developments? (under ‘Cultural and Natural Heritage’)*

General Comment

The Planning and Development Act 2024 under Section 50 requires that a planning authority shall prepare a strategy in their county development plans for the conservation, protection, management and improvement of natural heritage. This strategy shall include objectives for the conservation, protection, management and improvement of “features of the landscape that are of major importance for wild flora and fauna in accordance with Article 10 of the Habitats Directive), and other features of ecological interest”

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Aside from overarching strategic objectives, biodiversity-based policies in county development plans can typically be divided into site-based policies and non-site-based policies. Furthermore, only some of the sites are designated, while county biodiversity areas, and non-site-based policies will often be ecological features that are non-designated. Accordingly, we believe it useful that local authorities consider dividing their policies for biodiversity into site based, and non-site based.

In addition, we recommend to local authorities to consider if “catch all” policies work better than listing individually policies for individual ecological features. For example, a policy for the retention of natural features (which have not been identified as a site) should cover smaller stands of trees, hedgerows, watercourses etc, rather than having a policy for each feature. Equally this could be achieved for species-specific based policies.

This may enable more concise policy writing but avoids potential oversights, as listing is not exhaustive, and inevitably overlooks features which may also be important.

In terms of an overarching strategic objective, the Heritage Council recommends the following be inserted as part of the list of strategic objectives in the vision and introductory sections of the plan:

Strategic Objective X.X - It is the objective of Meath County Council to conserve, and restore, the ecological network of Meath, by protecting sites of local, national and international importance, and ensuring that development proposals seek to retain natural features which are important for the biodiversity of the county

National Nature Restoration Plan

The EU Nature Restoration Law seeks to restore at least 20% of the EU’s land and sea areas by 2030. Given the large land use requirement involved, it is inevitable that county development plans will have to accommodate this national endeavour. This is amplified through National Policy Objective 84 of the National Planning Framework 2024 which requires both regional and local planning authorities to support the preparation and implementation of the National Nature Restoration Plan. This is likely to require robust strategic objectives (as recommend below) in the county development plan in an overall sense, but also more specifically in the natural heritage chapter.

Strategic Objective X.X - Conserve ecosystems and habitats in Meath by protecting important natural heritage sites, both designated and non-designated, from inappropriate development, while simultaneously aiding nature restoration ambitions in line with the National Nature Restoration Plan.

In addition, the National Nature Restoration Plan is likely to identify the locations for ecological restoration. However, this is still in preparation, and in time such locations should be elicited from the main state bodies and visually expressed in county development plans also. This is needed to ensure that other development does not compromise or prejudice future restoration locations.

Furthermore, the planning system is primarily geared to assess land use change and the societal and environmental impacts of proposed works. Consequently, there is a need to ensure that any nature restoration projects be fully grounded in the scientific method in advance of an application

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for planning permission, to ensure that the restoration aims and objectives are successful. It should be acknowledged however that some ecological restoration attempts have a level of uncertainty. Accordingly, the following policy should be included in the county development plan:

Policy Objective X - Proposals for nature restoration projects need to demonstrate that the project has been based on the best available scientific data and best practice

National Biodiversity Action Plan

Section 50 (2)(b) of the Planning and Development Act 2024 requires that the strategies for conservation, protection, management and improvement of biodiversity should be in accordance with the National Biodiversity Action Plan. It is recommended that the NBAP 2024 is consulted in this regard. More importantly however, is to ensure that the local authority's own Local Biodiversity Action Plan (LBAP) be consulted. Both the NBAP and the LBAP should be listed in the hierarchy of plans in the introduction sections to the county development plan.

The Heritage Council have sought to comment on all LBAPs, and in doing so has recommended to the relevant biodiversity officer that actions in the LBAPs that require planning policy support should be identified. Subsequently this should receive policy provision commensurate with their importance in the relevant county development plan. We strongly recommend that this is done in liaison with the local authority's Biodiversity Officer.

Site Based Policies

European Sites Designations

Special Areas of Conservation (SAC) and Special Protection Areas (SPA) are the primary international designations in the country, formally described as the 'Natura 2000 Network' under the Birds and Habitats Directives. Policies and objectives are required that detail the requirements of these directives in relation to when an appropriate assessment/ screening opinion is required. These policies and objectives are largely established in Irish land use planning; however, the Heritage Council have noted that many applications that should be accompanied by at least screening opinions, are not. Therefore, we recommend that in policies that cater for the protection of designated SACs/SPAs that these include a provision for the notification of such requirements in pre-application discussions to potential applicants.

National Designations

Our national designations are Natural Heritage Areas (NHA), as identified under the Wildlife Act 1976, proposed Natural Heritage Areas (pNHA), National Nature Reserves (NNR), and require specific policy provision. To ensure that a distinction is made between SAC/SPA [Birds and Habitats Directive] and NHA/pNHAs/NNRs there should be a separate policy that deals with the national designations/sites. The Heritage Council has observed in some draft forward plans and planning application documentation that there may be some confusion between the assessment requirements for European designations and national designations. Ecological impact

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assessments are required for the national sites (NHA/pNHA/NR), while appropriate assessment (NIS) is the necessary mechanism for SACs and SPAs.

A policy is required for NHA/pNHAs/NNRs that seeks to prevent damage or deterioration to the habitats/species that are the basis for the site designation/identification. Such policies should be based on the following:

- Development should be avoided within NHA/pNHA/NNR
- Development proposals that may impact on a NHA/pNHA or NNR should be accompanied by an ecological impact assessment
- Proposals that have negative impacts on such sites will not be supported.

County Biodiversity Areas (CBAs)

The *Development Plans - Guidelines for Local Authorities 2022* note that the majority of the country lies outside of the protected/designated network. There are many other sites which are of local importance for flora and fauna. Local authorities have an important role to play in preventing the loss of such sites and the species which rely upon them for their survival. These *guidelines* go on to say that development plans should identify such sites of local ecological importance and endeavour to secure their protection.

National Policy Objective 84 of the NPF notes that the conservation, enhancement, mitigation and restoration of biodiversity is to be supported by integrating policies and objectives for the protection and restoration of biodiversity, including the avoidance and/or minimisation of potential biodiversity impacts, in statutory land use plan. This Policy Objective also states that the “*retention of existing habitats which are currently important for maintaining biodiversity (at local/ regional/ national/ international levels), in the first instance, is preferable to replacement/restoration of habitats, in the interests of ensuring continuity of habitat provision and reduction of associated risks and costs*” [emphasis added]

We note the question regarding local biodiversity sites in the Issues Paper, and indeed Meath County Development Plan has an important role to protect such undesigned habitats and sites that provide for protected species assemblages. In fact, there are some existing good policies to this effect in the current county development plan, namely HER POL 35. Albeit the most important of these features are not currently identified.

The Heritage Council will work with local authorities to identify the most important of these areas to enable their recognition as the key ecological areas for the county. Such areas would sit under NHAs/pNHAs and SAC/SPAs in a hierarchy of importance. We therefore recommend the following policy. Please note that depending on the timelines of the plan, it may be necessary to detail an aspiration to identify County Biodiversity Areas, during the lifetime of the plan.

Policy Objective X.X County Biodiversity Areas - It is the objective of Meath County Council to prevent both direct and indirect damage or deterioration of County Biodiversity Areas. Development proposals which may impact on these sites should

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be accompanied by an ecological assessment of the features for which the site has been identified as being of county importance.

Nature Restoration sites

Some local authorities may have ambitious plans for ecological restoration on public lands, which may be contributing to national nature restoration targets under the forthcoming National Nature Restoration Plan. It may be necessary to identify such sites and establish policy in county development plans that not only gives planning support to such habitat improvement ambitions but ensures that proximate development does not prejudice future nature restoration ambitions. Some local authorities may refer to such sites as nature development areas; however, the Heritage Council believes that 'nature restoration site' is more suitable to ensure consistency with the future National Nature Restoration Plan.

Non site Based Policies

Development, design and retention of natural features

At the level of the landscape the linkages between habitats are often provided by smaller ecological features. Whilst not considered ecological sites, they are often important linear habitats that provide coherence to the entire ecological network of a region at the landscape ecology scale. These connections both in the countryside and the urban environment, such as hedgerows, field margins, grass verges, ponds and small stands of trees, should be retained, as part of site design. The following suggested policies are recommended in this regard.

Policy Objectives X.X Natural Features, site design, and infrastructure

It is the objective of Meath County to prevent the undue loss of natural features, such as hedgerows, treelines, smaller stands of trees, grass margins and boundary walls that provide habitats for species. The design approach to landscaping and open space in new developments should retain natural features. How this has been achieved should be detailed in the drawings and design statements submitted with the application.

It is the objective of Meath County that any planting regime as part of site design and landscaping proposals is confined to native species and provenance. While maintenance regimes for hedgerows should be informed by the relevant national guidance e.g. National Biodiversity Data Centre guidelines on hedgerow planting

It is the objective of Meath County that all development proposals are designed with ecology in mind. Infrastructure including public lighting systems should be installed in a manner that prevents significant harm to species.

Water Environment and Ecology

From an ecological perspective, the aquatic environment is an important resource. This includes waterbodies, and watercourses and their immediate riparian and alluvial zones. Many of the

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country's important aquatic environments are protected under various designations. However, many watercourses and waterbodies are not, although they do fall under the general remit of the Water Framework Directive.

It is important to acknowledge that aquatic networks and hydrological regimes operate at the catchment level, in a complex network of surface and ground water flows. Hydrological pathways are the most common avenues by which development may impact on aquatic ecosystems, and therefore it is essential that planning policy aims to protect the entire water environment from development that may result in negative impacts on both water quality but also the biological quality of water.

Several guidance documents exist from Inland Fisheries Ireland (IFI) and Local Authorities Water Programme (LAWPRO). These recognise the interlinkages between surface water management, nature-based solutions and the ecological integrity of watercourses.

For watercourses and waterbodies outside of the protected network there is a need to manage development proposals carefully. Given that river basin catchments are not conducive to site-based mapping for the purposes of a local county development plan, there is a robust policy needed for the protection of watercourses and waterbodies in general, with particular emphasis on pristine waterbodies and catchments. This should be based on the following:

Policy X.X Aquatic Ecology and the Protection of the Water Environment - It is the objective of Meath County to prevent any further deterioration of the biological status of waterbodies and watercourses, with particular focus on catchments with good – high biological status.

All development proposals that may impact on the water environment should demonstrate how they have complied with the following, where relevant:

- *Planning for Watercourses in the Urban Environment Inland Fisheries Ireland*
- *Nature Based Management of Urban Rainwater and Urban Water Discharges, A National Strategy*
- *Implementation of Urban Nature Based Solutions - Guidance Document for Planners, Developers and Developer Agents" LAWPRO*

Species specific survey requirements

There are several protected species that may be present outside of protected sites. Some of which seek shelter in man-made structures, and forage in both large and small habitats across several land use types. Whilst the retention of natural features and ecological corridors, and the protection of sites, should aid all species, there may be a need for species specific surveys based on site specific conditions. A policy based on the following is recommended. Please note that the species list is not necessarily exhaustive.

Policy Objective X.X Species Specific Surveys - It is the objective of Meath County Council to ensure that applications that may impact on protected species/ species of conservation concern should be accompanied by a species-specific ecological survey, which can be

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included as part of general ecological assessments. The suitability of the receiving ecological environment to accommodate the following should be assessed e.g. Bat species, Swift and House Martin, Otter, Red Squirrel, Badger etc.

County Geological Sites

Although strongly intertwined with inherent landscape character, there will be particular geological sites of significant importance within our landscapes. Section 50(2)(j) of the Planning and Development Act 2004 obliges a county development plan to include a strategy on “places, caves, sites, features and other objects of archaeological, geological, historical, scientific or ecological interest”. County geological heritage audits, supported by the local authority, Geological Survey Ireland and the Heritage Council have been undertaken for the majority of counties.

County Geological Sites (CGSs) are the best examples of a given geological feature in each county and need to be promoted and protected through the county development plan. Many local authorities are already doing this as part of their county development plans, and we would encourage the local authority to continue to protect such features by listing and illustrating such sites. A robust policy for the protection of such sites should also be included in the plan, which establishes clear development management expectations. Information on county geological sites can be accessed [here](#).

Archaeological and Cultural Heritage

Relevant Questions from the Issues Paper include?

- *How can the new County Plan protect and enhance Meath’s existing natural, built and cultural heritage? (under ‘Cultural and Natural Heritage’)*

Defined and/or Designated Archaeology

Section 50 (d) of the Planning and Development Act requires plans to have objectives for monuments or wrecks as defined or designated under the National Monuments Act 1930-2014, as well as monuments, archaeological or historic objects protected under the Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023. In addition, objectives are required for world heritage properties, as well as world heritage candidate sites.

Robust policies for the protection of archaeological monuments and objects will be required in the plan. These policies should seek to prevent direct negative impacts on such features, as well as indirect impacts on their setting. Negative impacts on archaeological monuments should not be permitted unless in exceptional circumstances, which must be demonstrated.

The policies for defined and/or designated archaeology could include the sequential principle of avoid, minimise or mitigate. Within this context policies should seek preservation in situ, or as a last resort, preservation by record.

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Meath is home to the Brú na Bóinne World Heritage Property (WHP). The current draft Meath County Development Plan 2021-2027 does have policies that require development proposals to assess impacts on the Outstanding Universal Value (OUV) on the *Brú na Bóinne* World Heritage Property (WHP). However, since the adoption of the Meath County Development Plan in 2021, significant advancements have been made on how to assess this, through a specific Heritage Impact Assessment (HIA) guidance and methodology. The National Monument Service (NMS) has undertaken comprehensive work in this regard. Therefore, any objectives and policies in the forthcoming county development plan need to include the following:

Objective X - Proposals that may impact on the Outstanding Universal Value of the Brú na Bóinne World Heritage Property (WHP) need to be accompanied by a Heritage Impact Assessment (HIA). This HIA needs to be prepared in line with the following:

- *Guidance and Toolkit for Impact Assessments in a World Heritage Context UNESCO (2022).*
- *Summary of the Attributes for Ireland's two existing World Heritage Properties 'Brú na Bóinne' and 'Sceilg Mhichíl' DHLGH (2023)*

Liaison with the National Monument Service (NMS) will be required for such applications, the nature and scope of which need to be demonstrated as part of the application.

Please note that the Hill of Tara as a component of the Royal Sites candidate WHP may also be inscribed and if so, will need to be included in any such policy.

Non-Defined/Non-Designated and Unknown/ Discovered Archaeology

There may be other archaeological sites and objectives that currently do not benefit from designation/definition. However, there is an obligation on county development plans, under Section 50 (2)(g)(i) and (j) to have objectives more generally, for archaeological sites, any structures or parts of structures which are of special archaeological interest, as well as places, caves, sites, features and other objects of archaeological interest. This will include "relevant things" as defined in the Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023 which will be enacted in due course.

Unknown archaeological remains, items and sites are also given protection under the National Monuments Act, and objectives and policies for ground disturbance and accidental discovery are needed in county development plans. Zones of archaeological interest should be identified in county development plans, where relevant.

Policies will be needed in this regard that seek to protect material in situ by careful construction activities. In addition, the discovery of unknown objects/remains/features due to development activity will need to be catered for by policy which should establish proportionate conditions attached to planning permission. Large sites with a wide spatial footprint are likely to require pre-design archaeological investigations.

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Scheme Design and archaeology

Good design should pivot off the existing built, archaeological and cultural heritage context. In situ preservation can be advanced through a scheme design which is informed by the local archaeological heritage. This should not only include retention of archaeological features through site design, but also the setting of such objects and features. Archaeological assets can provide the basis for trails and provide interpretative content for greenways.

In addition, in cases where preservation by record is required, information and interpretation of the historic archaeology in and around the site should be part of the design considerations for the site. This can be achieved by street naming, and landscape and public realm design. Policies should be prepared in this regard.

Finally, some landscapes may be considered 'Heritage Landscapes' (see current Clare County Development Plan) or 'Archaeological Landscapes' (Kerry County Development Plan). There will be strong links between landscape policies and archaeological policies (see also our suggestions on landscape policies). We encourage local authorities to ensure that archaeologically rich areas, are fully integrated into landscape character assessments/landscape policies. The Heritage Council may be able to aid this endeavour, as far as reasonably practical. We make this point with reference to the highly significant archaeological landscapes in places like the Loughcrew and Fourknocks passage tomb complexes.

Various development types, but particularly large-scale infrastructure can have an impact on the setting of archaeological features. This is often accounted for in the Landscape and Visual Impact Assessment of schemes, with particularly relevance to the representative viewpoints at heritage sites. It is essential that policies that refer to the setting of archaeological features also include a requirement that representative viewpoints as part of LVIAs include the setting of the key archaeological sites that may be affected by the development.

Public Realm, streetscape, and archaeology

Successful public realm proposals sensitively anchor off the heritage assets that exist, using them as the centrepiece in new public realm design. This should be actively pursued not just in terms of architectural heritage but also archaeological heritage. Archaeological monuments are to be found in both our rural landscapes and urban environments. Heritage led placemaking can ensure that the design of streets and spaces amplify the prominence of archaeological features, or artefact finds, e.g. town defences, the footprint of former buildings, and other significant heritage assets therefore establishing a greater character and distinctiveness to public realm design.

We hold the view that this archaeological heritage could be better interpreted in terms of the public realm design of Irish streets and places. Archaeology can be incorporated into high quality public spaces with good interpretative resources for visitors and residents alike. The Viking Quarter in Waterford is an example whereby public realm design showcases heritage assets from the medieval period by establishing an urban quarter that is liveable and of high quality – a design that resulted in the creation of a strong sense of time depth for the city.

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Accordingly, the Heritage Council recommend that robust public realm, interpretative and placemaking objectives in the county development plan are established in a manner that seeks to enhance and promote local archaeological heritage. This would be particularly valuable in historic settlements in County Meath such as Trim, Kells, Navan, and Athboy. Such policies should require a material palette and soft landscaping approach that fully incorporates features of archaeological and cultural interest, with the prominence of the archaeological feature(s) the aspiration in public realm design.

Landscape, Rights of Way, Tree Preservation Orders

Relevant Questions from the Issues Paper include:

- *Are there sufficient policies in place to protect the countryside? (under 'Rural Development')*
- *What measures should be put in place to protect the amenities of the rural landscape while providing sustainable rural housing? (under 'Rural Development')*
- *Which public spaces do you like and why? What types of new public spaces should be provided? (under 'Community Services')*

Landscape

Section 50(2)(k) requires county development plans to have objectives for “*landscapes, views and prospects*” which, as per the provisions of Section 29(1)(m) of the same Act, includes the need for a strategy “*for landscape character that coordinates the categorisation of landscapes, in terms of their capacity to absorb particular types of development, across the region so as to ensure a consistent approach to the protection of the landscape*”. The Act also requires any such endeavour to have due regard to “*any framework of any Minister or the Government for the management and planning of landscapes*”, which should in turn also have regard to the European Landscape Convention done at Florence on 20 October 2000.

The Heritage Council recognise the ambition in National Policy Objective 90 of the NPF which seeks to facilitate landscape protection, management and change through the preparation of a National Landscape Character Map as well as the development of guidance on local landscape character assessments. The aim of this, as expressed by the policy objective, is to ensure a consistent approach to landscape character assessment, particularly across planning and administrative boundaries. Whilst the Heritage Council wish to see this pursued, in its absence, local authorities need to continue to establish their own approach to landscape characterisation and review.

In this regard, the Heritage Council would encourage the local authority, through its county development plan, to make the distinction between inherent landscape character and the landscape viewpoints as enjoyed by people (views and prospects). The former is the primary heritage consideration and should be informed by a clear understanding of the natural, the cultural,

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the archaeological, as well as the geological characteristics of the landscape. Views and prospects are based primarily on specific and identified viewpoints of landscape/seascape and can be intertwined with tourism and recreation policies.

Both need to be catered for in the plan. However, the inherent character description should be based on cultural and natural heritage characteristics, and people's perception of this entire character, and it is this which mostly determines the landscape's sensitivity to change. We would recommend that the county development make this distinction clearly.

In doing so, we encourage the local authority, in its landscape review/characterisation to define the landscape initially on inherent cultural and natural heritage attributes/character types (combined of land cover and land use). This should define, and inform, its sensitivity to change, and accordingly, a description of what sort of development can be accommodated, if any, and/or how it should be accommodated. This is required in the county development plan to be in line with Section 29(1)(m) of the Planning and Development Act 2024. Please do note that landscape should consider townscape character also, particularly in counties that have larger/many urban areas/settlements.

Once this is completed, clear development standards and expectations should be established, with the use of a hierarchy of importance also established if appropriate e.g. high landscape value to moderate landscape value etc. However, this value judgement should relate to the specific landscape character area in question. In some counties, archaeological and heritage landscapes, as well as county geological sites, and ecological designations should inform this sensitivity, as well as the inherent landscape attributes.

The Heritage Council believe that it is essential that landscape policies are robust and are informed by sound evidence bases such as landscape character assessments. Historically various development types have resulted in damage to important landscapes, particularly through cumulative effects. A robust landscape review/characterisation will be needed to inform the suitability of certain development types in specific locations. The Heritage Council may be able to contribute, as far as practical, to such characterisation.

Public Rights of Way and Access to Heritage

The Heritage Council encourages local authorities to place strong emphasis on peoples engagement with natural and cultural heritage and therefore support access to heritage sites in county development plans. Agreed access agreements can achieve this somewhat, while Section 51(2)(g) of the new Planning and Development Act does require that the content of the development plan have objectives aimed at *"preserving a specific public right of way, including a public right of way which gives access to any seashore, mountain, lakeshore, riverbank, monument or other place of natural beauty or recreational utility"*.

In identifying such access rights, we would recommend that consultation be undertaken with the county archivist and/or local studies librarian within local authorities. Outside of the local authority, there may be local expertise within historical societies, some of which collect and store historical

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documentation relating to the locality. The heritage officer in each local authority will be aware of the resources available in their area.

There is a wealth of information retained in the documentary heritage of an area, both in publicly available records and privately owned material. It is worth consulting with a local authority archivist to identify and locate papers held by the local authority or to advise on the existence of privately owned material. Such sources, along with engagement with local historical society groups would achieve much in terms of identifying historical uses of place including rights of way and access.

Of particular interest in this regard would be:

- Archives of local government which contain records of:
 - County and City Councils
 - City Boroughs and Corporations
 - Urban District Councils
 - Rural District Councils
 - Grand Juries
 - Boards of Guardians
- Private Archives (may be privately owned, or donated to local authority archive services or other repositories)
 - Estate records, which may contain extensive maps
 - Family or personal papers
- State resources including the Ordnance Survey of Ireland historical maps, drawings, letters, name-books and memoirs (all available digitally at <https://dri.ie/os200>)

It is important to note that the Heritage Council recognises the difficulties that local authorities have in this regard, as evidenced the [Office of the Planning Regulators Report](#) on the matter. Therefore, the Heritage Council will seek to aid local authorities in relation to information sources, as part of this endeavour, where possible.

Tree Preservation Orders

Section 48 of the Planning and Development Act 2024 places an obligation on planning authorities to have objectives relating to sustainable places and communities. This includes strategies for *“the provision, or the facilitation of the provision, improvement, extension and preservation of amenities” and the promotion of high standards (including high standards in public areas) of urban design, architecture and landscaping*. While Section 50 (2) (j) obliges a county development plan to contain objectives for *“places, caves, sites, features and other objects of archaeological, geological, historical, scientific or ecological interest”*.

Furthermore, Section 267 gives greater expression to the preservation of amenities, as identified in Section 48, for Tree Preservation Orders. This section states that *“if it appears to a planning authority that it is expedient, in the interests of amenity or the environment, to make provision for*

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the preservation of any tree, group of trees or woodland, it may, for that purpose, make an order with respect to any such tree, group of trees or woodland”.

Mature trees have both ecological and amenity value in towns, villages and cities, as well as the wider countryside. Many are of historical streetscape value and contribute significantly to the character of areas. The Heritage Council recommend that local authorities establish TPOs as part of the drafting of the county development plan. It is recognised that this may be more achievable as part of local area plans/settlement plans. Therefore, in this case the county development plan should include objectives for listing Tree Preservation Orders as part of settlement-based plans that will follow the adoption of the county development plan.

In drafting such policies, there will be a need to not conflate the environmental and amenity benefit of TPOs. Natural heritage policies should cater for important biodiversity sites including woodlands, as well as the retention of hedgerows and trees as part of site design.

Although some non-designated ecological sites/features may benefit from TPO status, there is a need for local authorities to identify TPOs specifically for amenity and public realm reasons in the first instance. Local historical societies and the wider community should be encouraged to submit information on historic trees, and we would recommend to the local authority to encourage them to do so.

Design of Green Infrastructure

The Heritage Council supports outdoor recreation that promotes people’s engagement with heritage i.e. seashore, mountain, lakeshore, riverbank, monument or other place of natural beauty. Outdoor recreation brings people closer to nature and culture, which is important, yet every trail, signpost and parking space has the potential to erode the very heritage that attracts visitors.

In general terms some recreational infrastructure can be ill conceived and overly rely on hard engineering rather than softer landscaped solutions. There is a need for all infrastructure, green, blue or grey, to reduce as much as possible the impacts on heritage assets including archaeological, architectural, but most acutely ecological. The National Outdoor Recreation Strategy 2023-2027, which the Heritage Council supports, has been prepared. “*Environment*”, namely the protection of habitats and landscapes, is noted as one of the six strategic objectives.

This *Strategy* rightly notes that due to the strong links between outdoor recreation and biodiversity, all plans and projects should be appraised in terms of their impacts on biodiversity, by undertaking the necessary ecological assessments that will inform the design of the proposal and ensure that ecological issues are fully addressed.

A universal access path in an urban environment will require a very different approach to the maintenance of waymarked trail in an upland environment. Such trail and route design should be informed by the environmental context. The Irish Sports Council (now Sport Ireland) in 2012

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developed a trail classification system, which included such considerations¹. This could be used to inform such policies in the county development plan.

Therefore, whilst active travel and engagement with heritage and nature is supported by the Heritage Council, there is a need to protect the very biodiversity or heritage feature that people engage with while partaking in recreation and leisure. Therefore, we would emphasise that while a county development plan may have regard to a non-statutory Outdoor Recreation Plan or transport manuals for infrastructure, this does not negate the need to comply with county development plan heritage policies. This is necessary for both private development and local authority own development.

Architectural Heritage

Relevant Questions from the Issues Paper include?

- *How can the new County Plan protect and enhance Meath's existing natural, built and cultural heritage? (under 'Cultural and Natural Heritage')*
- *How can we prevent the loss of thatched and vernacular structures? (under 'Cultural and Natural Heritage')*
- *Which public open spaces do you like and why? What types of new public spaces should be provided? (under 'Community Services')*
- *What is needed to make you town or village a more desirable place to live? (under 'settlement and housing')*

The Planning and Development Act 2004, expresses, through Paragraph 50 (h)(i)(m), that development plans should have objectives for architectural conservation areas, any structures, or parts of structures, which are of special architectural interest, and or such other things relating to the natural, archaeological or built heritage, as may be prescribed.

From the outset, the Heritage Council recommend that the strategic objectives for the county development plan should include the following strategic objective for architectural heritage:

Strategic Objective X - It is the objective of Meath County to provide protection to the existing built heritage of Meath. This includes both designated and non-designated structures and features which contribute distinctly to the local historic built environment, historic towns and wider cultural landscape.

Record of Protected Structures and Architectural Conservation Areas.

In terms of architectural heritage, the Record of Protected Structures (RPS) and Architectural Conservation Areas (ACA) are the primary means of designation and protection in the planning system.

The requirements for designating ACAs are detailed in Section 331 of Act. Within this context, the Heritage Council would emphasise that townscape character is of particular importance. While Section 331 of the Act does identify "the appreciation of protected structures" as a potential

¹ https://www.sportireland.ie/sites/default/files/2019-10/classification_grading_of_recreational_trails.pdf

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rationale for designating an ACA; of primary importance is the entire ensemble of the historic environment in question rather than individual buildings. This is emphasised in the Act with reference to character of place and is strongly intertwined with townscape and landscape.

Accordingly, the Heritage Council encourages Meath County to audit all settlements, and special architectural and archaeological clusters outside of settlements that would necessitate ACA designation.

We would recommend that further work be done as part of the drafting of the new county development plan to review existing ACAs and identify further streetscapes and/or ensembles of buildings as new ACAs. This should be undertaken in line with the “*Architectural Heritage Protection – Guidelines*” 2004. In addition, all ACAs identified should be accompanied by a “Character Appraisal/Synopsis”, which should comprehensively describe the architectural/archaeological heritage and character that so defines the designation.

In general terms, the Heritage Council would then emphasise that demolition in ACAs should be avoided, and that policies and objectives for ACAs set clear development management expectations. Of note, the Heritage Council wish to see supportive policies in terms of ‘conservation through use’ in ACAs, as well as the built environment more generally. In this regard, the following policy should be included in the plan:

Policy/Objective x: Departures from development management standards to facilitate the continued use of historic buildings in ACAs, as well as protected structures, structures listed on the NIAH, and the wider historic environment will be considered appropriate.

The Heritage Council do have concerns that other planning considerations may be compromising more important strategic planning objectives. There is a need that quantitative development management standards are not applied bluntly to heritage buildings both designated and non-designated. This relates to parking standards, privacy distances etc. The challenges and costs associated with bringing heritage assets back into use may be considerable, and a more hospitable planning environment is needed.

In relation to the RPS we encourage local authorities to review the National Inventory of Architectural Heritage (NIAH) within their local authority area to potentially make additions to the RPS. We would also encourage the local authority to elicit the views of local communities that may have knowledge of local non designated assets, which may be considered worthy additions to the RPS.

There should also be specific policy requirements for the RPS in the county development plan, based on the Architectural Heritage Protection Guidelines 2004. While a clear accessible listing of the structures should be provided in the plan, the point data should also be included in an interactive map viewer.

The Heritage Council would emphasise a particular policy for structures listed on the RPS, which may be of a ruinous nature/state. The policy should strike a balance between retaining such features as part of the landscape, the ecological potential of the feature, and whether such features

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should undergo significant intervention to bring back into use. In this regard, we request that the policy include the following considerations:

Policy Objectives X - Proposals that seek to restore heritage buildings which are in a ruinous state/condition should demonstrate the following:

- *The necessary documentation submitted should be carried out by Conservation Grade 3 Architect or above.*
- *A comprehensive overview and evidence of the condition of the building, particularly in relation to the historic features remaining and the associated significance of the building should be provided.*
- *How the proposed interventions and refurbishment approaches have been informed by this evidence and if appropriate how a modern intervention does not detract from the inherent historic significance of the structure and has therefore avoided conjectural restoration.*
- *An appreciation of the structure and its setting, as currently perceived as part of the overall cultural heritage landscape/townscape, as well as any ecological potential associated with the structure.*

Non-Designated Architectural Heritage Assets

The Planning and Development Act provides for all features that are of architectural interest, designated or not. Outside of the designated network (RPS and ACA) there may be locally important features and structures that should be better catered for in planning policy. This includes traditional buildings and buildings of vernacular character, including thatched properties. The latter faces challenges outside of the planning system, in terms of insurance, availability of materials and thatchers. Therefore, a supportive and positive planning environment is particularly needed. Accordingly, the following policy is recommended:

Policy/Objective x: - To protect and facilitate the conservation of structures, sites and objects which are part of the County's distinct local, historical and vernacular heritage, and which may not necessarily benefit from designated status. This includes structures listed on the NIAH, which do not benefit from RPS status.

Design and the setting of historic features

There may be historic buildings/features/structures/objects which include street furniture (water pumps, vent stacks,) as well as prominent buildings which are found in our landscapes and townscapes. Development schemes should anchor off such architectural heritage assets, enhancing their setting as part of the public realm design of schemes. Street and landscaping design should identify such features and seek to aid their prominence, which is needed to ensure that the history and character of our places is neither lost nor forgotten. This should include public

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sector schemes for street/road layout and public realm design, and other developments where such objects are present². The following policy is recommended:

Objective X - Public realm design and the design of open spaces in new developments should enhance the setting of existing historic buildings, features, and objects in a manner that aids their prominence and contribution to character of place.

Special Areas of Planning Control.

The special importance of architectural, historical, cultural or social character of a city or town is reflected in the provisions of Section 335-338 of the Planning and Development Act 2024, through the concept of areas of special planning control. There are many areas that are of special significance and were/are focal points of civic life in towns, villages, and sometimes, in the wider landscape. Most frequently, these are primary streets, squares and spaces, major avenues and the curtilage of landmark buildings, all of which were designed around civic life.

Ireland has a lamentable legacy on managing civic spaces in this regard, particularly compared to other European countries. Our urban fabric is car dominated, and while some notable efforts are being made in some urban settings, the level of pedestrianisation is low, and civic spaces no longer exist in any meaningful way in many Irish settlements. Historically this was not the case. Recent decades have seen such focal points of social life given over to facilitating car journeys and parking. This has led to a remarkable under appreciation of the historic environment of Ireland's settlements, whilst also damaging the attractiveness of such towns and cities as places to be and live.

Therefore, the Heritage Council are keen to ensure that social and civic spaces should be amplified and re-established in Irish settlements. Such spaces, which previously were designed along historic streetscapes and more frequently landmark, ecclesiastical and administrative buildings, are integral to the heritage of European towns and cities

Whilst national town centre first and regeneration strategies can aid this ambition, the Heritage Council contends that areas of special planning control need not necessarily be viewed as a restrictive provision but also offer a framework for more innovative approaches for positive placemaking. When linked with other endeavours, areas of special of planning control can be the primary legal mechanism for managing such an aspiration. The mechanism accounts not just for historic architectural buildings, but also civic spaces, landscaping and movement, all based on positive placemaking. This should pivot off heritage led regeneration, and the creation of spaces for people.

Enabling Development and Historic structures

There are many buildings including industrial, administrative, hospitals, mills and distilleries, and courthouses which may be more susceptible to vacancy due to changing operational requirements. Such buildings can also include some larger residential houses. All of which may be particularly at risk of dereliction. Given their prominence, this has an amplified impact on the townscape.

² See Heritage Council [Submission](#) on Public Sector scheme in Lanesborough.

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Placemaking is not necessarily confined to new placemaking, but also the places that already exist. Within this context, it should be recognised in policy that such buildings contribute to 'place' beyond their specific site location. And when abandonment is prevented, when a use is retained, or as a minimum, a pathway for future use is established, this brings a significant benefit to the historic environment in the immediate environs, and how such a landscape and townscape is perceived.

Local authorities should actively encourage the re-use of such buildings and ensure that planning applications are reviewed flexibly to ensure a responsive planning environment. Concurrently, there is a need for applications for development on sites where such buildings are present to establish a clear pathway for the re-use of such buildings as part of the proposed scheme. It is not acceptable that such buildings are merely left abandoned, while other areas of the site are progressed³. A campus type approach to such sites is needed, where the planning gain could be the continued use of protected structures and the enhancement of other historic assets on site. The following objective is therefore recommended in this regard:

Objective X: Enabling Development for Historic Structures:

It is the objective of Meath County to ensure that historic buildings and structures are reused and enhanced as part of development proposals. Schemes which fail to ensure continued appropriate re-use of historic buildings on site within the ownership boundary will not be supported. If historic structures and buildings are not conducive to operational requirements, a clear pathway for their re-use will need to be established before permission is granted.

Proposals which seek to comply with this policy will be supported by flexibility in terms of development standards, commensurate with the level of importance of the protected structure/historic building in question.

Other Matters

Mapping, Zoning and HeritageMaps.ie

The identification of key heritage sites should be an essential part of the mapping that accompanies the written statement of a county development plan. This should include:

- Record of Protected Structures
- Architectural Conservation Areas
- Natura 2000 sites
- NHAs, pNHAs, Nature Reserves and County Biodiversity Areas
- Landscape and seascape character areas
- Recorded Monuments and Places

³ Please see Heritage Council [Submission](#) on Baggot Street Hospital, Dublin

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At national level there is a disparate resource that lacks a consolidated heritage sites database that allows access to various planning related sites and designations. The issue is particularly acute for the RPS, ACAs and landscape/seascape character areas.

While the NPWS and NMS do have accessible mapped data for recorded monuments, and national and international nature designations, other county development plan designations/ sites are not easily accessible and often require significant research to locate and identify.

[Heritage Maps](#) is an interactive viewer where you can find or identify heritage sites and explore heritage data sets anywhere in Ireland. Many local authorities have been feeding into this resource on completion of their county development plan process, which has proven to be a valuable resource. Therefore, we would welcome engagement on how the mapped heritage sites as identified in the county development plan could be exported to Heritage Maps.

Environmental Assessment of Plans

Strategic Environmental Assessment and Appropriate Assessment will be carried out for this plan. It is essential that these are undertaken to the highest standards, where each policy/objective and zoning/designation mapping are individually assessed. Given the requirements placed on authorities by the Renewables III Directive, the SEA and AA process will be of utmost importance to ensure that these iterative processes inform the least sensitive environmental sites for development of renewables, but also employment, housing and other infrastructure. The Heritage Council will place strong emphasis on the quality of SEA/AA as part of our comments on the draft plan in due course.

Conclusion

We welcome the commencement of the new county development plan for Meath. We have highlighted the importance of heritage not just at an individual policy level but also at the strategic level for the future development and land use planning of the county. This should be recognised in the plan to ensure that development requirements are achieved in a manner that protects and enhances heritage and the environment.

We trust these recommendations will be considered as the local authority prepares the Meath County Development Plan.

Yours sincerely

Virginia Teehan

Chief Executive Officer

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