



Section 28 Strategic Environmental Assessment (SEA): Guidelines for Regional Assemblies and Local Authorities

Heritage Council Submission –19th November 2021

1. Background to the Heritage Council and Heritage Appraisals of Development Plans from 1998 onwards

The Heritage Council wishes to highlight to the Minister for Housing, Local Government and Heritage, and the Department of Housing that, prior to the introduction of Strategic Environmental Assessment (SEA) into Ireland in 2004, the Heritage Council operated a non-statutory system of *Heritage Appraisal of Development Plans* from 1998 onwards¹. This Heritage Appraisal system, which was created by the Heritage Council in partnership with local authorities in Ireland, followed a plan-based appraisal model from Australia, which was introduced after the Burra Charter in Australia (1979). Members of the Heritage Council executive and colleagues in Australia met in the late 1990s to create and deliver a plan-based heritage appraisal system in Ireland. The heritage appraisal system that was introduced had a balanced approach in relation to built, cultural and natural heritage and promoting sustainable development (see *Heritage Act 1995-2018*² for definition of heritage). The cover page of the Heritage Appraisal methodology is reproduced in *Appendix A*.

In July 2004, with the introduction of the EC SEA Directive and the SEA Regulations into Ireland, local and regional authorities then began to switch/pivot from the ‘non-statutory’ system of Heritage Council-led Heritage Appraisals to the ‘statutory system’ of undertaking SEAs for development plans – as noted in the draft guidelines, this system is local authority-led. For roughly a two-year period, a number of local authorities attempted to operate both systems/approaches but by 2006, Heritage Appraisals of Development Plans had been phased out.

Based on the above, the Heritage Council very much welcomes the opportunity to make observations on the draft guidelines based on a) its statutory role as a prescribed body and advisor on policy making; and b) its ongoing involvement in the preparation of SEAs for regional, spatial and economic strategies (RSEs) and/or county and city development plans (CDPs), local area plans (LAPs) and Strategic Development Zones (SDZs).

The Heritage Council welcomes the review of the previous guidance published by the EPA in 2004 and commends the Minister and his colleagues for undertaking a review in the form of producing draft guidelines, to update the 2004 Guidance. This submission focuses very much on the role of SEA in relation to landscape and cultural heritage in Ireland, as the existence of Natura 2000 sites and a suite of EU Directives, including Appropriate Assessment (AA), ensures that biodiversity is adequately addressed in the existing SEA system in Ireland.

¹ The Heritage Council’s Heritage Appraisal model was piloted on the emerging Donegal County Development Plan in 1998.

² <https://www.irishstatutebook.ie/eli/1995/act/4/enacted/en/html>

The Heritage Council is keen that the management of cultural heritage and landscape³ is afforded the same protection in the draft guidelines to ensure that the overall SEA system does not go 'out of kilter'. The Heritage Council's submission follows the structure of the draft guidelines, as follows:

- 2. Integrating SEA into the Plan-Making process;**
- 3. Screening;**
- 4. Scoping;**
- 5. The Environmental Report;**
- 6. Consultations on Plan and Environmental Report;**
- 7. Amendments to the Draft Plan, Adoption of Plan and Preparation of SEA Statement;**
- 8. Monitoring the Significant Environmental Effects of the Implementation of Plans; and**
- 9. Appendices.**

The Heritage Council recommendations – Key and Further - which are submitted throughout the report are summarised in Section 10 below.

2. Integrating SEA into the Plan-making process

Given the recent publication of the *Climate Change Plan 2021*, there is an onus on reusing existing brownfield sites, traditional buildings and embracing the circular economy. The Section 28 Guidelines are being prepared at a transformational time for Ireland and other EU Members States, given the emergence of a new wave of initiatives in Europe aimed at creating a carbon-neutral trade bloc by 2050. This strategic pathway for societal change supports the implementation of the UNSDGs through the EU Green Deal and the New European Bauhaus Movement. A key focus of all activity is a major cultural and behavioural 'shift' towards a circular economy where sustainable living is at the heart of all that we do re. live, work and play. Therefore, it is recommended that the emerging SEA Guidelines set out and endorse this international policy context from the 'get-go' through the SEA process and plan-making system.

The Heritage Council would recommend that the United Nations Sustainable Development Goals (UN SDGs) should be included in this early section of the draft guidelines along with an overview of how the two processes can be married to ensure deliver of the UNSDGs in Ireland. In addition, it is important that [policies], plans and programmes in Ireland pivot towards the UNSDGs as soon as possible. It is interesting to note that Scotland has recently retrofitted all national policy and it would be prudent if this exercise was undertaken as part of the formulation of the S28 SEA Guidelines.

It is also submitted that this section of the draft guidelines needs to include a clear reference to the UNECE Aarhus Convention⁴ along with an overview of the three pillars of the convention, namely: access to environmental information, public participation in environmental decision-making and access to environmental justice. Guidance on SEA and public participation is also required. It should be highlighted that consultation is not participation – they are very different theories and practices.

³ Landscape is taken to mean the full definition as per the European Landscape Convention (ELC), as per the definition included in the Planning and Development (Amendment) Act, 2010. i.e. it includes urban, rural, peri-urban, marine. Etc...

⁴ <https://unece.org/environment-policy/public-participation/aarhus-convention/introduction>

The draft guidelines need to embrace and facilitate public participation and engagement in the overall SEA process. Guidance on Public Participation in SEA would be extremely useful. This is extremely timely given the recent announcement that 2022 will be the *Year of European Youth*⁵.

HC Key Recommendation:

Guidance for Public Participation in Strategic Environmental Assessment (SEA) is needed.

This section also introduces the concept of baseline data collection. It would be beneficial if the emerging SEA Guidelines included a list of all macro environmental datasets that exist, when they were created i.e. are they pre the UNECE Aarhus Convention and when were they last updated, etc, e.g. Architectural Conservation Areas (ACAs) and/or the NIAH, etc. The Heritage Council wishes to highlight an excellent report from the OECD (2019) entitled: *The Path to Becoming a Data Driven Public Sector*.

The OECD report highlights that data creates public value and presents a data-driven public sector framework that can help countries and/or organisations assess the elements needed for using data to make better-informed decisions across public sectors. It is strongly recommended that our macro data systems need to widen and deepen to meet the environmental challenges ahead.

For example, in relation to landscape planning, the Republic of Ireland is still without a national landscape character assessment (NLCA) and/or any regional landscape character assessments (RLCAs). This is despite the launch of the National Landscape Strategy in 2015 along with the legal requirement for RLCAs being introduced under the provisions of the *Planning and Development (Amendment) Act 2010*. It is difficult to see how 'landscape' is going to be assessed through SEA and the planning system without these core baselines in place, as illustrated in **Figure 1** overleaf:

⁵ https://ec.europa.eu/commission/presscorner/detail/en/IP_21_5226

Gaps in Heritage and Landscape Policy Hierarchies in Ireland



November 2021

On a positive note, it is encouraging to highlight that seascape character assessments (SCAs) have recently been undertaken by the Marine Institute. The Heritage Council would recommend that the NLCA and RLCAs are carried out as soon as possible, in accordance with the NLS, the 2010 Planning Act and the European Landscape Convention (ELC).

HC Key Recommendations:

Guidance on SEA and Landscape and Cultural Heritage is needed as a priority.

A National Landscape Character Assessment (NLCA) and Regional Landscape Character Assessments (RLCAs x 3) should be undertaken as soon as possible in accordance with the NLS, the 2010 P&D Act and the European Landscape Convention (ELC).

In relation to landscape and cultural heritage and given the lack of a definition within the National Planning Framework (NPF) of Ireland's historic environment, it is recommended that the SEA Guidelines seek to address this policy gap. An up-to-date definition of Ireland's existing historic environment would also include benefits of protection and enhancement within the growing climate change emergency and national housing crisis.

HC Key Recommendation:

SEA Guidelines should include a definition of Ireland's historic environment.

This section also covers **Who is responsible for carrying out SEA?** The Heritage Council would submit that the UNECE Aarhus Convention is also relevant in this section – as noted earlier, it is important that public participation is at the heart of the SEA process in Ireland.

In relation to **Documenting the SEA Process**, it is important that an online National SEA Portal be established in accordance with the key tenets of the UNECE Aarhus Convention. Also, it is further recommended that reports are reduced in length and that alternative ways to communicate are explored and employed to encourage and facilitate public participation and engagement.

EC INSPIRE Directive - Directive 2007/2/EC⁶ of the European Parliament and of the Council of 14 March 2007⁷ established the Infrastructure for Spatial Information in the European Community (INSPIRE) aspirations that the EU in conjunction with each of its Member States would advance. The INSPIRE Directive, establishes an infrastructure for spatial information in Europe. Consistent spatial information is key to understanding many of the dynamic and location-based issues that are dealt with at a SEA level (and EIA level).

Our environmental plans and/or activities which may have an impact on the environment are dependent on robust spatial data. The Directive refers to no less than 34 different spatial data themes. These are fundamental to delivering evidence-based understanding and solutions for environmental [and other e.g., delivering the green deal] applications. It also provides for key technical implementing rules (IR) areas (Metadata, Data Specifications, Network Services, Data and Service Sharing and Monitoring and Reporting), and they are binding in their entirety.

⁶ <https://inspire.ec.europa.eu/inspire-directive/2>

⁷ <https://inspire.ec.europa.eu/inspire-maintenance-and-implementation/46>

The emerging SEA Guidelines should embrace coherency and ensure that our spatial data infrastructures are compatible and usable in a wider community and transboundary context. Through the SEA process, Ireland can foster a culture of creating spatial data that will serve its public systems into the future. All publicly funded projects, in whole or part, should fully accord to the INSPIRE Directive IR rules, and that data should be maintained for the wider community going forward.

HC Key Recommendations:

A National Geospatial and Data Protocol should be prepared to support the SEA Guidelines.

The SEA system needs to be open to embracing data that is created in partnership with LAs asap, e.g. CTCHC Programme datasets.

The guidelines should include a list of macro environmental datasets that exist or are emerging in the State and beyond.

3. Screening

This short section of the draft guidelines details how Screening is to be undertaken. It would be useful if the draft guidelines provided case studies and best practice examples of screening for plans in programmes to communicate this important in-house step to prescribed bodies, the public along with key stakeholders and civic leaders. Such openness would enhance transparency and ultimately help to build trust in the overall SEA process and the planning system.

As noted above, the recommended preparation of Guidance on Public Participation in SEA would enhance knowledge and understanding of the key steps involved, particularly those which are carried out in-house within the local and regional assemblies.

This section of the report mentions the likely effect on European sites and the Habitats Directive. It is interesting to note that nowhere in the draft guidelines is the concept of ‘human habitats’ mentioned or acknowledged. We return to the issue of the need to protect human habitats in Sections 5 and 7 below. It is also submitted that the implementation of the NLS including the production of a NLCA and three RLCAs would add a richness to the screening step, in relation to supporting the analysis and assessment of the capacity of the receiving environment to accommodate further development, depending on the type of development proposed and the effects on the environment in this regard.

A national SEA portal would provide a platform and interface to raise awareness of issued Screening Notices. This goes back to the OECD recommendation in relation to the need for a data-driven public sector. It is important that new digital interfaces are created to ensure that citizens can engage and interact in order to create public value and make better informed decisions across the public sector.

4. Scoping

The draft guidelines reference water quality and riverside paths, etc. The section of the document should include examples in relation to landscape and cultural heritage – for example, reuse of vacant buildings with the receiving environment and the wide-ranging environmental benefits of brownfield development in historic town centres, etc.

This is particularly relevant in relation to a new round of Local Area Plans (LAPs), which have tended in the past to be enabling documents for development on greenfield sites, rather than innovative plans to protect and enhance the existing receiving environment of historic core areas – i.e. many Irish towns (large and small) and villages are now suffering from widespread dereliction and face uncertain futures.

Ultimately, the quality of the baseline data will have a significant impact on the overall decision-making process. The Heritage Council would wish to highlight the innovative landuse survey work that is underway through the Collaborative Town Centre Health Check (CTCHC) Programme around the country – this is important geospatial data that is currently missing from local authority datasets. The Heritage Council will continue to work in partnership with local and regional assemblies to ensure that baseline data collection includes all heritage assets at a local, regional and national level.

Ireland's heritage is an integral part of the wider environment and it is important that the SEA process seeks to:

- I. Avoid unnecessary harm to the heritage – as defined by the Heritage Act 1995-2018;*
- II. Reduce the effects of harm where it cannot be avoided (mitigation);*
- III. Compensate for residual effects on the heritage that cannot be further reduced; and*
- IV. Identify positive benefits for the heritage that can be provided.*

The Heritage Council would welcome engagement during the initial scoping stage of SEAs and, in support of these draft guidelines, will seek to prepare SEA Guidance on Landscape and Cultural Heritage in partnership with the Department of Housing, Local Government and Heritage and the EPA SEA Unit. It is envisaged that this proposed guidance will assist the ongoing operations of the local authorities and regional assemblies.

5. The Environmental Report

This section sets out Annex 1 of the SEA Directive. Item (e) on the list includes environmental protection objectives – this is a similar approach to the Heritage Appraisal model developed by the Heritage Council and is very much to be welcomed within a landscape and cultural heritage context. It is hoped that the delivery of NLS, the NLCA and RLCAs will play a role in ensuring that these environmental protection objectives are evidence-based. Item (f) includes cultural heritage, including architectural and archaeological heritage, along with landscape. The emergence of a National Policy on Architecture (NPA) by the Department is timely in this regard along with the implementation of Heritage Ireland 2030.

Current and likely future state of the environment is addressed through the requirement to include a **baseline description of the current environment in the area**. It is submitted that the SEA process would benefit from additional geo-spatial data that is currently not being used during the assessment process, e.g. landuse data in historic town centres which is being created through the CTCHC Programme⁸. These landuse surveys and maps reveal that Irish towns have well above the normal rate of vacancy on ground and upper floors – over 20% and 80%, respectively whereas the norm in other European countries is circa. 5%⁹.

⁸ <https://www.heritagecouncil.ie/projects/town-centre-health-check-programme> - see outputs

⁹ Source: EC DG GROW Seminar, Brussels, February 2019 and Dutch Provinces Delegation study visit to Dundalk CTCHC Project, June 2019.

The Heritage Council recommends that the SEA system in the Republic of Ireland needs to be open to embracing data that is created in partnership with LAs as soon as possible (as stated in para 2.2 of the draft guidelines).

This can only be a good thing and create additional public value and lead to more robust, data-driven baselines. In addition, the CTCHC Programme is a collaborative programme so the need for greater public participation, as raised earlier in this submission, will also be strengthened as a result. In addition, there is a very real cost to 'Do Nothing', which needs to be recognised and quantified in our public systems and processes in relation to environmental management and sustainable development. This section should be much stronger and robust and could benefit from reference to other countries and their ways of undertaking environmental evaluations.

HC Further Recommendation:

The 'Do Nothing' option should be quantified for historic towns with ground floor commercial vacancy level over 11% (the normal rate in the EU is 5%).

Given the pending new round of Local Area Plans (LAPs) for settlements of over 5,000 population (after the new round of CDPs are in place), it is critical that the Do Nothing is quantified for historic towns with ground floor commercial vacancy levels over 11%. Ground floor commercial vacancy rates are traditionally the key indicator in urban economics when alarm bells should go off and on. Unfortunately, vacancy was not being tracked in the planning system or indeed through SEA, so we are now in the unfortunate situation where numerous [historic] towns, i.e. cultural heritage, have ground floor commercial vacancy rates of 20%¹⁰ plus – which is unheard of in other European countries.

Section 5 of the draft guidelines also includes the need for a description of the physical environment of the area, topography, landscape characteristics, etc. Again, it is unclear how this is going to be carried out when there are no detailed landuse plans (including upper floors) in the current SEA system. There are also no NLCA or RLCAs in place, which will make it difficult to assess transboundary baseline conditions.

Data sources – the draft guidelines would benefit enormously from the formulation of a National Geospatial and Data Protocol to ensure that all data is created and mapped in a standardised way. The draft guidelines should seek to progress a single source of geospatial truth for the whole of the county including its historic settlements. All public authority information needs to be further supplemented and enhanced to provide the appropriate level of detail, as per the *Planning and Development Regulations, 2001-2021*.

It is important that the public planning system and the SEA process are advanced to incorporate this detail, and make full use of it, to create public value as per the OECD recommendations back in 2019.

¹⁰ <https://www.heritagecouncil.ie/content/files/Dundalk-Collaborative-Town-Centre-Health-Check-Report-2019.pdf>

Geographical Information Systems (GIS) – based on the OECD report and Ursula’s von der Leyen’s State of the Union Address in September 2021¹¹, it is recommended that all data contained in the LA GIS systems should be brought together in a national SEA digital portal. A training and education programme should also be established to ensure that the public understands and benefits from these new public data systems along with the youth. As the President of the EC stresses, “*digital is the make or break issue....*”

Environmental Problems – it is recommended that the text should include landscape/townscape and cultural heritage examples. For example, there is no mention of ‘dereliction’ and/or ‘vacancy’ in the draft guidelines. This unfortunate omission clearly does not reflect the very real environmental problems currently experienced on the ground in relation to cultural heritage and townscapes/cityscapes.

The draft guidelines refer to SPAs and SACs on numerous occasions, yet there is no mention of the National Inventory of Architectural Heritage (NIAH) in relation to buildings or structures of international significance and/or Architectural Conservation Areas (ACAs) with international significance. As such, the draft guidelines need to be careful that they do not have an ecological and biodiversity bias. Again, this goes back to the earlier point about the SEA process needs to evolve to ensure it does not go out of kilter.

HC Further Recommendation:

The guidelines should include landscape/townscape and cultural heritage examples to ensure there is no bias towards biodiversity and that the system does not go ‘out of kilter’.

This section also covers **Who is responsible for carrying out SEA?** As noted above, the Heritage Council would strongly recommend that the UNECE Aarhus Convention is highly relevant in this section – as noted earlier, it is important that public participation is at the heart of the overall SEA process in Ireland to ensure trust in our public systems.

In relation to Strategic Environmental Protection Objectives, the Heritage Council submits that examples should be provided in the draft guidelines that relate to landscape and cultural heritage, i.e. human habitats. The section in relation to Strategic Environmental Protection Objectives (para 5.2.4) is unnecessarily ecology focused. This section needs to be better balanced to reflect the full spirit and intentions of the EC SEA Directive.

Alternatives – given the draft guidelines do not mention dereliction or vacancy, it is again disappointing to see omissions in relation to alternatives to include ‘existing’ cultural heritage in this section. An environmental alternative in relation to all landscapes and cultural heritage is to reuse what is already there, i.e. the greenest building is the one that is already built. This approach to reuse is in keeping with the EU’s drive for a circular economy along with government policy in relation to the recently launched Housing for All.

Clearly, it is not sustainable development to support further development on greenfield sites when historic cores (brownfield sites) have very high vacancy levels, which, as highlighted earlier in this submission, are completely out of step with other EU Member States.

¹¹ https://ec.europa.eu/commission/presscorner/detail/en/SPEECH_21_4701

Cumulative effects – given the very high levels of vacancy in historic town centres, which is impacting on the long-term viability of the associated cultural heritage at a cumulative level, it is submitted that this section of the draft guidelines needs to be re-examined to ensure that the draft guidelines are effective and appropriate.

Clearly, something has failed in the past if it has led to such a high level of vacancy and wide-spread town centre malaise, which is essentially the cumulative effect of previous landuse and development plans.

The issue of monitoring is dealt with in section 8 below.

Non-Technical Summary - In accordance with the UNECE Aarhus Convention, it is submitted that the SEA reports (environmental report) need to be produced in a clear and concise way, in order that the public may understand and engage with their content and data in a beneficial way. For example, it is submitted there should be a limit to the number of pages in an SEA Report. Also, it would be beneficial if all Non-Technical Summary Reports were available on a national portal/online digital platform.

HC Further Recommendations:

An online National SEA Portal should be set up.

A SEA training and education programme should be established to ensure that the public understands and benefits from these new public data systems.

6. Consultations on Plan and Environmental Report

UNECE Aarhus Convention - It is noted that the SEA Directive was transposed into law in the Republic of Ireland prior to the ratification of the UNECE Aarhus Convention. Given this time lag, the Heritage Council would recommend that a review of the SEA Regulations would be prudent to ensure that they embrace the three key pillars of the UNECE Aarhus Convention, in relation to public participation, access to environmental information, and access to environmental justice.

Consultation with Environmental Authorities – The Heritage Council would recommend that the Heritage Council website along with a hyperlink to Heritage Maps¹² be included in any website resource to inform SEA consultations.

Transboundary Consultations - In relation to transboundary consultations with Northern Ireland, it is submitted that an all-island SEA Forum should be established through the North-South bodies to ensure that excellent working relationships with colleagues in the north, in relation to shared environmental management matters, continue. This is particularly important in relation to existing and proposed climate action and renewable energy action plans for on and off-shore renewables, which may have significant cross-border environmental effects. In addition, the updating of technical guidance on arrangements for transboundary consultations with Northern Ireland concerning SEA plans and programmes would be most welcome, particularly in relation to shared landscape/seascape and cultural heritage matters.

¹² <https://www.heritagemaps.ie/>

HC Further Recommendation:

A North-South SEA Forum should be established.

In relation to consultation with and from other EU Member States, it is important that the prescribed bodies under Irish planning law e.g. the Heritage Council, should be consulted at as early a stage as possible, given resource constraints. The Heritage Council would welcome a meeting with the International Planning Regulation Unit in the Department to clarify arrangements and likely work programme in relation to transboundary consultations.

Consideration of Submissions received – the statement in relation to providing a clear and transparent account of how consultation and public participation has shaped the plan is to be very much welcomed. It is submitted that the provision of new guidance on SEA and Public Participation will widen and deepen this participative approach to plan-making process in Ireland.

7. Amendments in the Draft Plan, Adoption of Plan and Preparation of the SEA Statement

SEA Statements – as noted above, it would be beneficial if all SEA Statements (along with SEA scoping reports and Environmental Reports) were made available on one national, digital portal/platform in keeping with the drive to transform the existing planning system to a modern, digital e-Planning system¹³.

The Heritage Council welcomes discussions and receipt of all SEA Statements in relation to heritage asset management. Given the recent publication of the *Climate Action Plan 2021*, it is submitted that a separate section of the online SEA platform should be dedicated to plans that relate to the implementation of this new plan.

8. Monitoring the Significant Environmental Effects of the Implementation of Plans

The Heritage Council welcomes the inclusion of the statement that, *'monitoring contributes to determining whether SEA is, as it is meant to, leading to a high level of protection of the environment and promotion of sustainable development (Article of the SEA Directive)'*.

However, the Heritage Council has been tracking and monitoring vacancy rates in historic town centres for several years through the CTCHC Programme and it is apparent that the SEA monitoring system is not working in relation to historic town centres and historic landscapes/townscapes. Vacancy rates are not included in SEA monitoring reports at the present time nor are they included as Strategic Environmental Protection Objectives. In addition, the lack of implementation of the National Landscape Strategy (NLS) has resulted in a significant policy gap in relation to the planning and management of historic landscapes and how *damaged landscapes* (historic or otherwise) can be reinstated.

¹³ <https://futurescot.com/scotlands-planning-system-in-line-for-35m-digital-overhaul/>

The Heritage Council wishes to reiterate that the vacancy levels experienced in Irish towns and historic town centres are very high in a global context¹⁴. The SEA systems in Ireland must pivot towards this reality – the system must be able to adapt and innovate. The Heritage Council would welcome a meeting to discuss a new round of environmental indicators for SEA in Ireland to ensure that historic town centres and their communities, i.e. human habitats, can reduce vacancy levels to a more normal level (the normal target vacancy rate [ground floor] is 5%). Future landuse plans, including a new round of Local Area Plans (LAPs), must move away from supporting further greenfield development at the expense of regenerating what already exists in historic town centres.

It should be reiterated that the guidelines do not mention dereliction and/or vacancy in any context.

HC Further Recommendations:

The text should include examples of Strategic Environmental Protection Objectives which relate to landscape and cultural heritage, i.e. human habitats.

9. Appendices

Finally, it is recommended that the appendices in the emerging Section 28 Guidelines should include a list of all available macro environmental data sets – existing and emerging in the State and beyond. The Heritage Council website and Heritage Maps should be included in the list provided.

In addition, a list of SEA Teams throughout the country should also be provided to prescribed bodies to enable and encourage consultation with environmental authorities along with enhanced public participation and engagement in the SEA process.

10. Summary of Heritage Council Recommendations in relation to SEA Guidelines

The Heritage Council submission as set out above contains recommendations, which are summarised as Key Recommendations (7 no.) and Further Recommendations (7 no.) below:

Key Recommendations (7 no.) from the Heritage Council:

- 1. *Guidance for Public Participation in Strategic Environmental Assessment (SEA) is needed;***
- 2. *Guidance on SEA and Landscape and Cultural Heritage is needed as a priority;***
- 3. *A National Landscape Character Assessment (NLCA) and Regional Landscape Character Assessments (RLCAs x 3) should be undertaken as soon as possible in accordance with the NLS, the 2010 P&D Act and the European Landscape Convention (ELC);***
- 4. *SEA Guidelines should include a definition of Ireland's historic environment;***
- 5. *A National Geospatial and Data Protocol should be prepared to support the SEA Guidelines;***
- 6. *The SEA system needs to be open to embracing data that is created in partnership with LAs asap, e.g. CTCHC Programme datasets;***
- 7. *The guidelines should include a list of macro environmental datasets that exist or are emerging in the State and beyond;***

¹⁴ <https://www.irishtimes.com/business/economy/ireland-has-10th-highest-rate-of-vacant-homes-in-the-world-study-finds-1.4709476>

Further Recommendations (7 no.) from the Heritage Council:

- 8. *The 'Do Nothing' option should be quantified for historic towns with ground floor commercial vacancy level over 11% (the normal rate in the EU is 5%);***
- 9. *An online National SEA Portal should be set up;***
- 10. *A SEA training and education programme should be established to ensure that the public understands and benefits from these new public data systems;***
- 11. *The guidelines should include landscape/townscape and cultural heritage examples to ensure there is no bias towards biodiversity and that the system does not go 'out of kilter';***
- 12. *The text should include examples of Strategic Environmental Protection Objectives which relate to landscape and cultural heritage, i.e. human habitats;***
- 13. *A North-South SEA Forum should be established; and***
- 14. *The guidelines should embrace the recently published Climate Action Plan 2021.***

Finally, the Heritage Council would welcome a meeting to discuss the submission and the recommendations set out above. For further information in relation to this submission, please contact Ali Harvey MIPI AILI on aharvey@heritagecouncil.ie and/or M. 087 419 3458.

Appendix A: Heritage Appraisal of Development Plans - Heritage Council, Donegal County Council and Irish Planning Institute (IPI)

