



18 May 2026

RSES Submissions,
Southern Regional Assembly,
Assembly House,
O'Connell Street,
Waterford
X91F8PC

Dear Sir/Madam

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. We seek 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.

General Comment

The Heritage Council welcomes the publication of the Intention to Review the Regional Spatial and Economic Strategy (RSES) for the Southern Region, as well as the review of the Metropolitan Area Strategic Plans (MASP) for the cities of Cork, Limerick and Waterford.

Such regional plans are an important conduit of planning policy between national policy [National Planning Framework, and the National Marine Planning Framework, and national guidance] and the county and city development plans. They should be seen as an essential link in the chain of implementation of national policy objectives.

It is therefore important that the RSES sets clear expectations for county/city development plans, so that they can be materially consistent with national policy and indeed regional policy. It is also important that the RSES brings added value at the strategic level and ensures no unnecessary duplication of national/ county level policy making.

The Heritage Council has reviewed the Issues Paper(s) provided as part of this consultation. Under the Heritage Act 1995, and the Planning and Development Regulations 2001, the Heritage Council's primary remit relates to cultural, built and natural heritage, as well as landscape and seascape. We have divided our submission by the following topics:

1. Strategic planning and settlement patterns as they relate to heritage
2. Renewable development
3. Natural heritage (inclusive of biodiversity and ecology)
4. Architectural Heritage

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5. Archaeological heritage
6. Landscape

Our submission will detail the key expectations we believe are necessary provisions in the regional economic and spatial strategies to ensure compliance with national policy.

From outset the Heritage Council recommends to the Regional Authority that comprehensive chapter(s) on cultural and natural heritage, inclusive of landscape and seascape are included. To achieve this, with the view to maintaining consistency with national policy, we recommend policies reflect the national policy objectives, and/or reflect standard presentation of such themes in county/city development plans.

Before commenting on specific thematic areas, we recommend that the policy context includes reference to key national and international policies on heritage. This includes the National Biodiversity Action Plan 2024, Heritage Ireland 2030, National Climate Action Plan 2025, and Section 28 guidelines/national planning statements where relevant.

Furthermore, in the regional profile/contextual sections, the commentary should not be confined to just economic or infrastructure matters. Heritage matters that require strategic policies at the regional level should also be captured in any profiling/baseline context for the plan. This includes landscape, and nature conservation sites.

This should then feed into the vision and the overall strategic direction of the RSES insofar as the need to advance development needs whilst ensuring the protection and improvement of natural and cultural heritage.

Finally, the Heritage Council strongly supports people accessing their heritage, whether it be mountain, riverside, lake or monument. Outdoor recreation and leisure networks are key to this, and the Heritage Council believes in the potential of outdoor recreation strategies to provide such recreational opportunities without impacting on the heritage that brings people to such areas. The RSES should reflect on the need for recreational networks on the regional scale and to make policy provision for such. Whilst good initiatives have been engaged already through various schemes including the trails programmes, and the National Outdoor Recreation Strategy, Ireland still has low levels of access to recreational networks by European standards.

Strategic Planning and Settlement Patterns as they relate to Heritage

On this topic, our commentary addresses the following key theme questions as presented in the issues paper:

A Liveable Region: What specific challenges exist across our Cities, Metropolitan Areas, Towns, and Rural Communities with regards to creating sustainable communities, and how can the RSES help to address these?

What opportunities exist for Transport Oriented Development and what measures are needed to unlock these areas for development?

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What are the challenges facing the development of vacant and brownfield lands within our settlements?

A Greener Region

Mobility: How can connectivity across the Region be improved while ensuring an efficient, accessible, safe, and sustainable transport system that reduces reliance on private cars?

Creative and Innovative Region:

Recreation and Community Facilities: How should the RSES plan for future provision of facilities?

At the level of first principles negative impacts on cultural and natural heritage and on our landscapes are amplified from inefficient land use planning. In the absence of a measured approach to compact and consolidated growth, development patterns will inevitably encounter more heritage sites and features. It is therefore that the Heritage Council support national objectives for compact and consolidated growth and encourage the regional spatial and economic strategies to set clear policies and expectations in this regard.

The National Planning Framework, during its drafting of the updated iteration, adopted in April 2025, stated “*The physical format of urban development in Ireland is one of our greatest national development challenges*” and that “*getting the physical form and location of future development right offers the best prospects for unlocking regional potential*”. The Issues Paper for the RSES has also described well the current situation for the Southern Region, and it is clear that the country continues to struggle with this challenge. For heritage, there are two important repercussions from this.

- Unnecessary expansionist development footprint results in a sprawl type development that directly impacts on habitats, ecological features and wider ecological networks at the regional scale.
- The country’s increased dispersed settlement patterns contribute to the parallel degeneration of many towns and villages, and indeed sections of large cities. This has had a direct effect on our country’s national built architectural heritage

To address this, the RSES should make provision for the following, as far as practical at the regional planning scale:

- Ensure that the regional planning of the region is based on fundamental principles of consolidating growth and avoiding sensitive environmental and heritage sites.
- More hospitable planning environment for brownfield/vacant lands/sites, and inner settlement core development opportunities, particularly in relation to the relaxation of some development management standards i.e. car parking standards, privacy distances. Such planning requirements should not undermine national objectives for town centre first development. This is particularly true for heritage structures, whereby the primary issue should be sympathetic adaptive re-use of the historic fabric.
- Amplified effort for heritage led regeneration in towns and villages

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- Amplified effort on quality of life/ amenities and services in key settlements including school provision/recreation etc to ensure that attractive alternatives to dispersed rural housing exist. This can fit within existing frameworks such as the town centre first frameworks but should be a core feature of forward plans also.
- Ensure that there is not a conflation between high density and compact growth. Very high-density levels may lead to a specific unit size prevalence (1 and 2 bed flats). This leads to displaced demand for family homes, which in an Irish context may manifest too often in dispersed rural housing or very low-density suburban development in greenfield locations
- Encourage sequential test development in settlements. Whilst we recognise that it is unlikely that all development needs can be met on brownfield sites only, priority and preference should be given to development within existing settlement boundaries
- Encourage the re-use of existing building stock, which also has a climate imperative.
- More advanced mapping of heritage assets and sites, and how they inform the location of development, and contribute to the vitality of our settlements by ushering development towards less impactful locations. This should form part of the 'key diagram' and core strategy maps of the RSES.

Many of the above solutions can help transition to a greener region and meet climate change obligations. As an example, compact growth can ensure that transport and land use patterns are strongly integrated, and therefore 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. New stations on towns along train lines could also be considered.

Renewables Development

On this topic, our commentary addresses the following key theme questions as presented in the issues paper:

A Greener Region: What policy changes could be made through the RSES to help mitigate and adapt to climate change, and embed circular economy principles across all sectors?

Energy Infrastructure: How can the RSES provide for energy efficiency, renewable energy, and resilience of energy infrastructure in and beyond the lifespan of the strategy?

The Heritage Council are conscious of the transposition of the Renewables III Directive into the Irish land use planning system. Concurrently the RSES has a particular requirement for the implementation of renewable energy targets at regional level.

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 and economic strategies and may broadly correspond to "Areas Suitable for

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Wind Energy” in existing county development plans. Given the potential repercussions for 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 for the selection of such areas, as part of plan making, to be informed by heritage designations and features. This expectation should be made clear for local authorities at the regional level.

Whilst there remains some uncertainty until full transposition 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 renewable developments. These should avoid important landscape/seascape areas, Natura 2000 sites, NHAs/pNHAs, and county biodiversity areas/ features, as well as cultural and archaeological heritage sites and features. The Heritage Council recommend that the constraints analysis study be published with any draft plan or strategy, with a clear justification demonstrated for the location of sites suitable for renewables. The RSES should ensure robust policies for this.

It is assumed that areas most suitable for wind energy will be identified, and whilst needed, these should be located in the least environmentally sensitive areas and be informed by the heritage assets across the region with the significance of such assets universally applied to the same standard.

This is particularly important to ensure a consistency of approach i.e. the least sensitive sites for renewables are identified irrespective of administrative boundaries. This will work towards reducing any displacement across county boundaries, should the environmental constraints analysis be universally applied to the region. It will also ensure that there is not excessive clustering in some areas, which may have disproportionate impacts on heritage in such areas. This will be particularly important for landscape and landscape ecology which will be dealt with in subsequent sections.

Natural Heritage

On this topic, our commentary addresses the following key theme questions as presented in the issues paper:

A Greener Region: What policy mechanisms and innovation can the RSES encourage to achieve nature restoration and support actions on biodiversity in the Region?

Ecological Network at the regional landscape scale

Ecological systems operate at the landscape scale. While designated ‘sites’ (e.g. European and national designations) to protect specific habitats/species/ecological features are important in land use planning terms, a true ecological network requires an understanding of nature conservation and restoration at the regional level, which includes all features of biodiversity. In addition, many species have specific dispersal and migration patterns that require large areas to support viable populations of such species to sustain such levels at the national level.

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It is with this in mind that the Heritage Council places strong emphasis on the importance of the regional spatial and economic strategies for nature conservation and restoration. Regional plans are essential in this regard.

Broadly speaking, an ecological network of a county, a region, or a country comprises 'sites', often designated for specific features i.e. habitats/species; as well as non-designated ecological features that exist in the wider countryside e.g. hedgerows, watercourses etc. The RSES should set out a clear expectation for county/city development plans on how they can contribute to nature conservation and restoration at a large spatial scale i.e. the regional scale.

In this regard, the Heritage Council are very cognisant of the provisions of Section 50 of the Planning and Development Act 2024; the NPF provisions for biodiversity namely National Policy Objective 85 and Development Plans - Guidelines for Local Authorities 2022.

Within Section 50, there is an obligation for local authorities to identify features of ecological significance and biodiversity in a general sense. For regional spatial and economic strategies, Section 29 is relevant which states that the strategy should include "the preservation and protection of the environment and its amenities, including integration of the National Biodiversity Action Plan and the archaeological, architectural and natural heritage of the region".

National Policy Objective 85 of the NPF specifically notes that retention of existing habitats which are currently important for maintaining biodiversity (at local/regional/national/international levels) is preferable.

The Heritage Council has observed that a significant gap in the management of nature in the planning process is the identification of significant ecological features that exist outside of the designated site network i.e. below the level of Special Areas of Conservation/ Special Protection Areas, Natural Heritage Areas/ proposed Natural Heritage Areas. In doing so, the Heritage Council is encouraging local authorities to identify areas of county biodiversity importance. The Heritage Council is preparing a research methodology for identifying such sites that can be used to meet such obligations at national level.

We therefore recommend that for the RSES to be consistent with national policy and legislation; to implement Section 29 of the Planning Act; and to set clear expectations for county/city development plans that policy provision be made for ecological features commensurate with county level importance. The need for this is acknowledged in the text of the Development Plan Guidelines which specifically states:

*"While protected areas cover a significant part of the country, the majority of the country lies outside of this 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. Development plans should identify such sites of local ecological importance and endeavour to secure their protection. Any development on or near such sites should avoid any significant adverse impact on the features for which the site is considered to be of local importance**" Our emphasis*

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We recommend that the RSES reflect these national endeavours and include a policy, based on the following recommended draft

“To aid the protection of biodiversity and ecosystems at the regional scale, development plans should seek to identify areas of county biodiversity importance that exist outside the current designated network. Along with national and European designations, such areas should then contribute to the core of the regional ecological network. In achieving this development plans should also have policies for the protection of non-designated biodiversity in the wider countryside”

The rationale for this is that once county biodiversity areas are identified and included in an adopted county/city development plan the benefits are twofold. Firstly, that the planning system is further equipped to meet the challenges of biodiversity loss. Secondly, it is expected that it will make a more efficient planning process, whereby areas of county importance for biodiversity are clearly identified and illustrated. This will ensure that delays are avoided down the line at application stage as sensitive sites have been avoided. This will inform zoning for housing, and employment land, as well as infrastructure, and renewable energy locations, therefore indicating likely constraints for all stakeholders early on in the process.

Outside of this specific point, we would also recommend that the RSES continue to promote the integrity of European and national designations as per existing requirements.

Natural features and good design

Furthermore, we also recommend that as part of the “liveable region” section that good placemaking and design incorporate natural features when constructing both private schemes, as well as public schemes e.g. recreational routes, public realm and landscaping proposals.

Aside from more tangible site/feature-based biodiversity protection, the Heritage Council believe that the Irish planning system should do more nationwide to ensure that good design and placemaking and more intertwined with biodiversity. Far too often are sites cleared of natural features to achieve a ‘blank slate’ for construction, whereby any replacement biodiversity measures are poor by comparison to what was present.

Whilst the RSES does not set specific site-based policies for design, we believe a policy that provides for more nature informed placemaking and site design is needed. Often mature natural features (mature trees, wet grassland, hedgerows and drainage ditches etc) provide a ready-made green space solution for new developments, that should be easily accommodated as part open space requirements. This can regularly be achieved in a manner that is not necessarily incompatible with achieving the same quantum of development.

A strategic policy at RSES encouraging this would be valuable, particularly in relation to the implementation to wider national biodiversity objectives in national planning policy.

National Nature Restoration Plan

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Furthermore, the RSES should account for the provisions of the forthcoming nature restoration plan. It is likely that the planning system, particularly county and city development plans, will have to contribute to meeting these quantitative land use targets as well as other issues in the plan. The RSES should have a strongly policy on this that gives further direction to county and city developments.

Architectural Heritage

On this topic, our commentary addresses the following key theme questions as presented in the issues paper:

*Creative and
Innovative Region:*

Cultural Identity & Language: What measures are needed to better protect and promote the Irish language (Gaeilge), our unique heritage, and the creative sectors as drivers of regional vibrancy and growth?

At a high level, the Heritage Council remains significantly concerned about the condition of our settlements. The levels of vacancy and dereliction in villages, towns and cities seems anomalous with the prevailing economic position of the country. In planning specific terms, we consider the following to have direct relationships with this:

- The hollowing out of centres and the parallel expansion of a more dispersed settlement pattern
- Historic poor placemaking and design in settlements, and the lack of civic spaces, reducing the attractiveness of such settlements as places to live
- Changing retail dynamics and large out of centre shopping destinations
- Overly car dominated streets and spaces in settlements.

Firstly, the Heritage Council note that in a housing crisis, combined with the poor liveability of some settlements that alternatives to a dispersed settlement pattern can sometimes be limited. Therefore, more robust interventions should be encouraged for developments that are conducive to family living in settlements.

This relates to previous points on the provision of services and amenities, as well as more recreation and leisure opportunities within walking and cycling distance in our settlements. This can entice more people to choose to live in settlements, which is essential to achieve compact growth.

The RSES should ensure that our settlements are places to be and not just pass through. Adequate policies that address these issues are needed at strategic level. Each relate to other i.e. car dominated and poorly designed spaces does not entice family living, which expedites the desire for more dispersed housing.

In addition, the RSES should emphasise a hierarchy of considerations for planning applications. It is essential that national compact growth and other strategic ambitions such as the re-use of

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existing building stock should not be compromised by some quantitative development management standards i.e. car parking provision, privacy distances.

Of utmost importance for the Heritage Council is that there be strategic policies in the RSES that encourages heritage led regeneration; amplifies the importance of existing cultural and built heritage as defining character of place; and for our settlements and places to anchor of such features as part of their development trajectory.

Archaeological Heritage

On this topic, our commentary addresses the following key theme questions as presented in the issues paper:

*Creative and
Innovative Region:*

Cultural Identity & Language: What measures are needed to better protect and promote the Irish language (Gaeilge), our unique heritage, and the creative sectors as drivers of regional vibrancy and growth?

Whilst archaeological matters are often most suitably dealt with at the level of a development plan, the Heritage Council strongly recommends that the RSES set strategic policy for managing the archaeological resource at regional level, therefore setting clear expectations for county and city development plans. In this regard the Heritage Council place particular emphasis on the links between archaeology and landscape. The archaeological resource is essential to defining places and landscapes. Some local authorities through their development plans have identified such places e.g. County Clare's Heritage Landscapes or County Kerry's Archaeology landscapes. Such archaeologically informed landscape understanding should be captured in any landscape policies/evidence base that the RSES pursues.

Landscape

*Creative and
Innovative Region:*

Cultural Identity & Language: What measures are needed to better protect and promote the Irish language (Gaeilge), our unique heritage, and the creative sectors as drivers of regional vibrancy and growth?

The Heritage Council places strong emphasis on the requirement under Section 29 of the Planning & Development Act relating to landscape character, which is needed to coordinate 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 this valuable national resource.

Our submissions on county development plans work towards this goal. However, we acknowledge that to adequately achieve this endeavour that the regional administrative level would be the most effective. In general terms, we support the RSES to achieve this as part of its drafting. In doing so we make the following recommendations:

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- To make the distinction between inherent landscape character and the landscape viewpoints as enjoyed by people (views and prospects).
- To ensure that the inherent character description be based on cultural and natural heritage characteristics, and people's perception of this entire character, as it is this which mostly determines the landscape's sensitivity to change
- This should then lead to a description of what sort of development can be accommodated, if any, and/or how it should be accommodated.
- 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.
- Laise with neighbouring regional assemblies in relation to landscape character, particularly in relation to the regional boundaries to ensure consistency at these locations.

This will allow more robust policies to be established in county development plans which therefore will also ensure more potent implementation at development management stage for matters such as renewables, and the management of rural housing impacts on the landscape.

Marine matters

On this topic, our commentary addresses the following key theme questions as presented in the issues paper:

A Greener Region: Marine: What priorities should shape future coastal and marine planning to ensure climate resilience, economic growth, and sustainable resource use?

Whilst the National Marine Planning Framework and the Marine Area Consent process are the main policy and consenting regimes for the location of renewables and other marine related sectors, the coastal local authorities within the region will have special relevance for maritime issues. There may be merit in the RSES providing commentary on the level of offshore renewables envisaged in proximity to the coastal authorities in the region. This will aid an understanding of the necessary requirements for onshore infrastructure, and the associated heritage impacts within the jurisdiction of the coastal planning authority.

In addition, we believe that Ireland's maritime heritage is a unique resource to an island nation. The RSES should amplify the importance of coastal communities, and their heritage. Whilst change is not incompatible with our maritime heritage, it does need to be managed sensitively given the convergence of climate, development, and biodiversity challenges.

Conclusion

Our commentary is primarily related to the RSES, however, many of our points are pertinent for metropolitan area strategic plans also. We request that our submission be read with this in mind.

We trust this submission will aid the regional authority in its drafting, and we look forward to commenting on the draft Regional Economic and Spatial Strategy (RSES) and the Metropolitan

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Area Strategic Plans (MASP) in due course.

Yours sincerely

Virginia Teehan

Chief Executive Officer

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