

## Conducting Reviews of Planning Performance – Stakeholder Consultation

Heritage Council Submission, 13<sup>th</sup> January 2020

As many aspects of Ireland's heritage are managed through the planning process and via instruments such as Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) at a plan and programme level, the Heritage Council submits that the following recommendations would assist in providing robust indicators for review of planning performance, and also a reliable baseline from which a review can be measured:

### EC/National:

1. Raise awareness of the UNECE Aarhus Convention and important role of local authorities (LAs) in delivering on the key tenets/three pillars;
2. Support communications from the National Oversight and Audit Commission (NOAC) – ensure that the public knows what NOAC exists and what the organisation is for. How is the reporting undertaken – what role do stakeholders and communities have in NOAC's operations – needs more public engagement and participation;
3. Support communications from Transparency Ireland in relation to research on LA operations – ensure their findings are addressed in relation to planning matters;
4. Raise awareness of the Department's Local Authority Modernisation Unit – there is limited awareness about their role, key aims and objectives
5. Establish National LA Datasets in relation to strategic planning and land management matters (i.e. establish baselines for monitoring and evaluation) – see below for detail.
6. Monitor and publish LA legal fees on an annual basis re. planning matters/operations – publish league table;
7. Monitor and publish LA environmental infringements under EC law on an annual basis.

### LA SEA/AA, Public Participation, MSP, etc:

8. Monitor and publish LA expertise/capabilities in SEA and AA – annual monitoring of SEA indicators (to ensure greater understanding of these) – *National SEA Education and Communications Plan* required to ensure that this information is in the public domain and that there is more public awareness of the key aims and objectives of SEA and AA;
9. Ensure community representatives or members of LA PPNs are involved in all SEA and AA processes – establish national portal to share results and to highlight areas of good practice;
10. Monitor LA (and regional) LCAs and SCAs<sup>1</sup> in Ireland – establish trans-boundary indicators, in light of Brexit;
11. Introduce *Public Participation Statements* for all LA operations, in accordance with the key tenets of the UNECE Aarhus Convention – monitor said statements and ensure feedback from local communities and stakeholders (i.e. communities of interest and communities of place);
12. Undertake *LA Stakeholder Attitudes Surveys* on an annual basis – there is very little public interface with senior management in LAs- this should change in the new era of transparency and collaboration – link findings to performance management indicators – publish results of surveys;

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<sup>1</sup> There is no NLCA or RLCAs in Ireland at the present time, despite the NLS being in place since 2015.

13. As part of the emerging MSP, establish a dataset on marine ecological zones and proposals for national parks.

**National/LA Datasets to support Sustainable Communities and effective Building & Land Management:**

14. Establish national/LA dataset for Vacancy/floorspace in settlements throughout Ireland – set legally-binding vacancy targets for town centres to ensure sustainable communities, e.g. 5-7% - see Heritage Council and Partners' CTCHC Programme;
15. Establish national/LA dataset on building stock and condition (and likely ecological impacts due to refurbishment) – see Dutch model of building stock management, as per Heritage Council's submission on NPF;
16. Establish dataset on LA ownership of historic and natural assets (e.g. historic structures, monuments, collections and habitats) with a view to improved portfolio management
17. Establish national/LA datasets on embedded carbon for designated town centre areas;
18. Establish national/LA dataset on building ownership utilising existing datasets such as Local Property Tax, Rates, ESB connections, etc – ensure dataset is up to date and there are no gaps;
19. Monitor and publish quarterly information on the LA Derelict Sites Register – assess activity and effectiveness;
20. Monitor and publish quarterly information on LA CPO activity – produce public league tables;
21. Establish a national/LA dataset on buildings at risk (linked to the above) and NIAH – monitor and publish results on an annual basis;
22. Monitor effectiveness of Architectural Conservation Areas (ACAs) in Ireland – establish indicators for LA ACAs;
23. Monitor effectiveness of protected structure designations – e.g. assess EIARs on a regular basis to measure loss of built heritage/loss of embedded carbon, etc
24. Establish structures with community representatives to monitor cross-border Natura 2000 sites to ensure that the conservation objectives are being upheld;
25. Establish and monitor the overall percentage spend of LAs on transportation and set targets for public transportation networks v private transportation.

**LA Resources:**

26. Invest in the expansion of LA Heritage Officers Network – recruit assistant LA Heritage Officers;
27. Invest in LA Archaeological Officers and Conservation Officers to manage built and cultural heritage through the planning process;
28. Invest LA professional roles such as archiving and curatorial staff; and
29. Invest in the expansion of LA Biodiversity Officers Network (5 no. officers at present in the country) and implement LA Biodiversity Action Plans with links to climate change targets.