



Your Ref: Issues Paper for the Leitrim County Development Plan 2022-2028

Our Ref: **FP2020/024**

*(Please quote in all related correspondence)*

12 August 2020

Planning Department,  
Leitrim County Council,  
Áras an Chontae,  
St. Georges Terrace,  
Carrick on Shannon,  
Co. Leitrim  
N41 PF67

**Re: Issues Paper for the Leitrim County Development Plan 2022-2028**

A chara

On behalf of the Department of Culture, Heritage and the Gaeltacht, I refer to correspondence received in connection with the above.

Reference to the Minister/Department for Culture, Heritage and the Gaeltacht will, in the coming period, be amended to refer to the Minister/Department of Housing, Local Government and Heritage once the relevant legislative provisions to give effect to this change are completed.

Outlined below are heritage-related observations/recommendations of the Department under the stated heading(s).

**Architectural Heritage**

Built Heritage Policy (DCHG) recommends that built heritage is considered as an integral part of the wider built environment and should be dealt with holistically throughout the development plan.

As part of raising awareness of the county's built heritage the Department recommends the appointment of an Architectural Conservation Officer (ACO) with expert skills and practical experience. The role of the ACO includes supporting the council in its stewardship of the county's rich architectural heritage legacy, guiding best practice in terms of the reuse and the adaptation of historic buildings to climate change, supporting the implementation of national grant schemes such as the Department's Built Heritage Capital Grant Schemes, the Historic Towns Initiative and the Irish Walled Towns Network, supporting the securing of urban regeneration funding and collaborating on major infrastructural projects such as transport and flood relief works.



A number of policy documents pertaining to built heritage and archaeology are under consultation or complete, including Heritage Ireland 2030, the Climate Change Sectoral Adaptation Plan for the Built and Archaeological Heritage and the National Policy on Architecture. These documents position built heritage as a central and integrated theme in government policy. The Department welcomes the policies and objectives of these core documents being inserted into future development plans.

The recent Programme for Government 2020 has provided a focus to historic urban centres – cities, towns and villages, as the opportunity to consider cultural heritage as the capital for societal well-being, innovation and for social cohesion. The COVID-19 lockdown has demonstrated the importance of culture heritage during the pandemic for supporting well-being in communities. In the wider context the built environment is the setting for our lives, our work and recreation. Built and archaeological heritage provide the structure and form of our historic cities towns and places, the cultural layers have evolved and continue to develop over time. Consideration for the maintenance, repair, remaking, adaptation and conservation of these finites resources should be holistically stitched into all development policies and objectives.

The renewal of Local Authority development plans is timely in terms of the global climate change challenges and presents opportunities for the potential of built heritage to be fully considered in county development plans as a central theme. Implementing policy, raising awareness and providing guidance to owners of historic buildings on issues such as thermal upgrading and building repair requires in-house expertise to provide coherent and coordinated advice. A key recommendation is the appointment of staff such as Conservation Architect, Archaeologist and Heritage Officer to guide and inform owners.

There are a number of areas that the Department consider require greater attention and focus in future development plan objectives and policies:

- a. Climate Change – heritage resilience and sustainability, consideration of appropriate measures to ensure the long term survival of historic structures, their uses and their contribution to the sense of place.
- b. Town revitalisation - enhanced policies for heritage-led urban regeneration based on an understanding of their cultural layering/transmission of cultural significance/high quality adaptation, reuse and renewal of historic fabric and remaking of historic places.
- c. National Inventory of Architectural Heritage – use building survey and garden survey to inform policy and planning.
- d. Vernacular Architecture - address the incremental damage and cultural loss of settlements and their settings due to the lack of awareness, vacancy and demolition.
- e. National Policy on Architecture – Places for people. 5 themes to be embedded in the future development plan policies to ensure the delivery of and implementation of government’s policy, including the Local Authorities role in ensuring the delivery of high quality architecture and quality place



- making for everyone and in demonstrating best practice in the care and maintenance of historic properties in its ownership.
- f. Heritage Ireland 2030 – 3 strands to be embedded with the importance of communication, digital opportunities and community engagement as part of the delivery of built heritage policies.
  - g. Flood Relief works – attenuation, upgrading and repair of existing infrastructure, high quality design of new infrastructure and coordination with public realm/recreational amenity in urban centres.
  - h. Tall buildings in historic urban centres – mitigation of negative impact on historic character areas and urban landscape in relation to large ground scrappers as well as tall buildings through the consideration of design criteria and guidance to safeguard the historic built heritage context.

**The following themes are recommended for inclusion along with objectives and policies that accord with the conservation of the County’s Built Heritage.**

#### **Local Authority Climate Change Strategy**

As part of the National Adaptation Framework, DCHG has published a *Climate Change Sectoral Adaptation Plan for the Built and Archaeological Heritage (2018)*. The Department is engaged with the Climate Action Regional Offices (CAROs) through our Climate Change Advisory Group to ensure a consistent approach to protection and adaptation of heritage across the country. The Department anticipates ongoing engagement with the CAROs throughout the implementation of our sectoral plan.

While the architectural heritage of this country has survived well in the past, changing climatic conditions may make it less able to cope. Climate change can alter and accelerate decay or can overwhelm the capacity of older structures to deal with severe weather events, increased extremes of wetting and drying, or cold or heat. There is also a significant threat to architectural heritage from climate action posed by maladaptation, that is, poor quality or ill-advised adaptation works leading to damage to heritage, whether directly or indirectly.

In the preparation of the local authority adaptation strategies, there are a number of issues regarding protection of architectural heritage that the Department recommends should be taken into account to identify the architectural heritage at risk in its area, to assess its vulnerability to climate change and develop disaster risk reduction policies for direct and indirect risks. For example, the Departments recommend the strategy should undertake to:

- Identify the architectural heritage in the local authority area that may be under threat, directly or indirectly, due to climate change. This should include, but not necessarily be restricted to, the protected structures and architectural conservation areas designated in the local authority Development Plan. It is noted that due to the COVID -19 lockdown of urban centres that many town buildings have been left vacant and inaccessible and many will not re-open. Buildings that are left with poorly performing rainwater goods, and roof coverings will be very vulnerable in inclement weather.



- Include objectives to carry out climate change risk assessments for the historic structures and sites in the local authority's functional area particularly those in the authority's own remit.
- Include objectives to develop disaster risk reduction policies addressing direct and indirect risks to the architectural heritage in its area.
- Include objectives to develop resilience and adaptation strategies for the architectural heritage in its area.
- Develop the skills capacity within the local authority to address adaptation / mitigation / emergency management issues affecting historic structures and sites in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works.

The Department recommends that, where such officers are employed, the architectural conservation officer and/or heritage officer should be included on the local authority's Adaptation Steering Group.

#### **The revitalisation of Historic Urban Centre – cities, towns and villages**

The Department is a key stakeholder in promoting the revitalisation of historic urban centres and has had a central role in the development of innovative policy, guidance on best practice in the reuse of existing buildings and the development of high quality public realm, concepts which have been supported through annual funding programme for towns and their building fabric. In support of the vision of the National Development Plan, the Department is developing a National Policy on Architecture (NPA), under several themes, all of which are applicable to the future sustainable development of town centres i.e. research strategies required to inform planning and development, heritage-led regeneration and climate change adaptation and the design of high quality places for people. During the consultation phase of the NPA, the Department, has received many significant contributions and presentations - the Collaborative Town Health Check Programme (CTHCP) demonstrated its strategic importance to informing future town management policy by providing the point of engagement with a business community, the compilation of baseline data for assessing and visualising the well-being, quality and economic vitality of a town centre and allowing comparison to be made with European counterparts on the significance of the current vacancy rates presenting in Irish towns, pre COVID -19 lockdown.

As Ireland emerges from lockdown society we have never been more aware of our surroundings and the benefit that a quality built environment brings to our lives. Whilst areas of disadvantage and constraints of urban living have been highlighted during the lockdown, Government has acknowledged the need to provide economic stimulus to assist society in its recovery. The EU is similarly providing support to Member States with policies and funding being aligned to deliver the upgrade existing building stock as an integral part of climate change adaptation, town revitalisation and economic prosperity. The Department's built heritage grant schemes have been revised to tackle climate change resilience and to gather information to inform future funding strategies and practices for towns. The Architectural Conservation Officer has a key role in the implementation of such schemes, communicating



their benefit, developing best practice and supporting traditional skills to retain the local character.

Acknowledging that a greater percentage of inhabitants now live in urban centres than the countryside, urban centres provide the opportunity to focus on the challenges and opportunities that climate change adaptation and the re-purposing of our extant building stock will bring. Historic building refurbishments and conversions in small settlements and rural areas have helped to accommodate new uses, facilitating rural economic diversification. Historic areas often provide the focus for leisure facilities, from theatres and art installations to restaurants and bars. Historic buildings, areas and waterways can serve as catalysts for the repopulation of inner-city areas and development of new and sometimes more specialised housing, retail and leisure markets.

Programmes such as the CTHCP health check surveys provide the imperative to the Local Authority as well as the basis to become more attentive of the well-being of towns as providing an understand of the opportunity to focus through a single lens and to ascertain the benefit of interconnecting government policies and funding to greater effect and benefit of rural society. The adoption of governance tools within Local Authorities such as the Health Check Programme and Conservation Plans for special sites, and their respective setting up of one-stop –shops to promote and coordinate the planning and building regulatory aspects of urban regeneration is regarded as a positive and proactive means to enabling built heritage to be reused and adapted successfully, It is a planning model that may be applied to the various scale of urban settlement as necessary.

### **Policy**

- To consider concepts of historic urban landscapes as a collection of buildings at the various scales of settlement, the origins of Irish cities, towns and villages which give rise to their special characteristics. These include setting, topography and natural features. The conservation and reuse of early traditional structures, roofscapes of historic centres and the recognition of interrelationships between sites and landscape features in terms of the insertion of new buildings and managing their impact on the historic environment.
- To consider a *Town Centre First Approach* which puts town centres at the heart of decision making to revitalise historic urban centres. To appoint a Local Authority multi-disciplinary team which communicates the historical and architectural context, focuses on the repair and upgrade of existing historic buildings, and guides new use adaptation with regard to architectural character and significance.
- To promote the development of heritage-led regeneration, to plan for the reuse and conservation of core built heritage and archaeological sites within urban centres as an integral part of the evolution of the historic place and its significance.
- To promote best conservation practice and to lead by example through the management and safe-guarding of historic properties in the ownership of the Local Authority.



- To support the development of sustainable infill to the town back lands that is appropriate in scale and character to that of the historic centre, that transitions and accommodates surviving structures and retains the historic streetscape form particularly within sensitive areas of built and archaeological importance. To ensure strategic housing development supports rather than detracts from the vitality and overall character of historic town centres in terms of scale, connection and mobility strategies.
- To compile core data information about the built and archaeological evolution of historic places, i.e. to monitor condition and vacancy to inform future development strategies and progress.
- To coordinate significant infrastructural projects such as public realm works, flood relief works or new transport routes and alternative modes of transport to the benefit of surviving historic sites in order to improve their enjoyment, presentation and enhanced accessibility. The Department notes in this regard the removal of traffic from urban centres and the resulting improvement in air quality which has been exemplified by the recent COVID-19 lockdown and the perceived enjoyment of urban living. These transitions support a return to sustainable and attractive urban living.

#### **The National Inventory of Architectural Heritage (NIAH) – Building Survey**

Under Section 53 of the Planning and Development Acts 2000-2012, the Minister for Culture, Heritage and the Gaeltacht may make recommendations to a planning authority concerning the inclusion of particular structures, specific parts of particular structures, or specific features within the attendant grounds of particular structures for inclusion in local authority Records of Protected Structures. Local authorities must have regard to such recommendations, where they relate to structures recorded by the National Inventory of Architectural Heritage (NIAH) and rated as being of International, National or Regional significance. In development planning, any proposals for development must take account of the possible impact on the historic interest of these structures. If the Council, after considering a recommendation made by the Minister, decides not to add the structure to the RPS, it must inform the Minister in writing of the reason for its decision. The Minister has recommended sites for inclusion in the Record of Protected Structures and to date, the Council has included a number of sites as Protected Structures in their own right and as part of Architectural Conservation Areas. The structures that are not formally protected benefit from a form of protection through Section 53(2) of the legislation, which allows the planning authority to have regard to the Minister's recommendations where a building is subject to a planning application.

The purpose of the NIAH is to identify, record and evaluate the post-1700 architectural heritage of Ireland, uniformly and consistently, as an aid in the protection and conservation of the built heritage. A key part of the work of the NIAH is to raise awareness of the richness of the architectural heritage and in this regard, the NIAH maintains a website, [www.buildingsofireland.ie](http://www.buildingsofireland.ie), that features all structures recommended by the Minister, in descriptive, photographic and map form. This website is also a useful link to a range of other material, including information about grants, and downloadable publications relating to





practical buildings conservation. The NIAH has produced illustrated books for all counties and cities, constituting short introductions to the architectural heritage.

While the NIAH has carried out surveys for all counties, such surveys are representative rather than comprehensive. It is envisaged that all counties will be updated over time, with further ministerial recommendations for inclusion in the Record of Protected Structures.

### **Policy**

- To consider the inclusion of all structures identified by the NIAH and recommended by the Minister for Culture, Heritage and the Gaeltacht in the Council's Record of Protected Structures.
- To consider that all such structures be regarded as 'Candidate Protected Structures', pending verification by the Council and inclusion in the Record of Protected Structures.
- To direct users of relevant local authority services to the information resources of the NIAH website [www.buildingsofireland.ie](http://www.buildingsofireland.ie).

### **NIAH – Garden Survey**

The NIAH has compiled a record of significant historic designed landscapes, demesnes and gardens throughout the country. The objective is to begin a process of understanding and appreciating the extent of this rich heritage. The county boasts a significant number of such places and some are accessible to the general public. These places may be private gardens, public parks or landscapes associated with country estates and demesnes.

The Council recognizes the contribution that these planned landscapes make to the appearance of the countryside, and their significance as a source of information about history and society in the county. These places also hold significant resources for biodiversity because of their wide range of habitats, whether open grassland, water courses and open water, woods and copses, and old buildings and walls. Our designed landscapes, demesnes and gardens provide havens for an enormous variety of animal and plant species and, through careful enhancement and rehabilitation, these can offer significant potential for enhancing biodiversity more generally. Importantly, such places are also helping to mitigate the effects of climate change. Where such places are open to the public, they offer tremendous opportunities in terms of mental and physical health and wellbeing through being in close contact with nature.

Since medieval times, demesnes were lands retained by a lord for his own use and occupation, with associated gardens and places for food provision, such as orchards, pigeon houses, rabbit warrens and fishponds, adjacent to the principal residence. Over time, demesnes were developed to include 'naturalistic' parkland, woodlands and additional buildings, such as gate lodges and follies.

These historic designed landscapes, demesnes and gardens may not be in the Record of Protected Structures *per se*, although various constituent elements may be included.



Elements of such places include: the demesne house and outbuildings, gates and boundary walls, avenues, walled gardens and pleasure gardens/landscapes, glasshouses and orangeries, icehouses, pigeon-houses, bridges and follies, private chapels, graveyards and mausolea, canals, lakes and duck and fishponds, rabbit warrens, tree-rings, copses, coverts and plantations; also associated features built by the owners of these places (such as workers' houses, schools, etc.).

These habitats contain collections of plants and specimen trees that may be of national or international botanical importance and interest. They may also be of significant historical and aesthetic interest, or illustrate aspects of the development of gardening and of gardens and parks, providing insights into changes in society over time.

Cork County Council has produced a document, *Guidance Notes for the Appraisal of Historic Gardens, Demesnes, Estates and their Settings*, that is an attractive guide for understanding designed landscapes and, in the case of development proposals, facilitating the preparation of appraisals of historic gardens and designed landscapes and possible impacts on their heritage value.

<https://www.corkcoco.ie/sites/default/files/2017-04/Guidance%20Notes%20for%20Appraisal.pdf>

## **Policies**

- To identify significant historic designed landscapes, demesnes and gardens for protection under the development plan.
- To designate Architectural Conservation Areas, where considered appropriate, in order to preserve the character of historic designed landscapes, demesnes and gardens.
- To identify and protect significant views to or from such places.
- To encourage the compilation of Conservation Plans for the long term conservation and management of cultural landscapes and their components in the ownership of the Local Authority/State.
- To cooperate with the National Inventory of Architectural Heritage in assessing and celebrating historic designed landscapes, demesnes and gardens.
- To encourage and facilitate the retention and careful maintenance of these places and the various components set out in the introduction above.
- To encourage the cataloguing of plant collections, trees and habitats within these places to appropriate national standards.
- To encourage the cataloguing of fauna within these places to appropriate national standards.
- To protect and promote heritage and traditional varieties of plants and trees within our historic designed landscapes, demesnes and gardens.
- To promote public awareness, enjoyment of and access to these sites and to seek the cooperation and assistance of other interested parties, including Government Departments and state agencies, in this regard.





- To preserve and protect the biodiversity of these places and, where appropriate, to encourage the enhancement of the range of plant and animal species, in order to add to local, regional and national biodiversity.
- To promote conservation, renewal and improvement that enhances the character and setting of historic designed landscapes, demesnes and gardens and of former examples of such places, and to resist proposals or developments that would lead to the loss of, or cause harm to the character, principal components, or setting of these places.
- To require a detailed appraisal of the potential impacts of any development proposed for within or adjacent to these places, or that might affect its setting. A methodology for preparing such an appraisal can be found in the *Guidance Notes for the Appraisals of Historic Gardens, Demesnes, Estates and their Settings* (Cork County Council, 2005). Applicants for proposed large-scale developments within historic designed landscapes, demesnes and gardens may be required to produce 3D Digital Survey Modelling to demonstrate that the proposed development does not adversely affect the site or its setting.
- To have regard to *Guidance Notes for the Appraisal of Historic Gardens, Demesnes, Estates and their Settings* (2006) published by Cork County Council (<https://www.corkcoco.ie/sites/default/files/2017-04/Guidance%20Notes%20for%20Appraisal.pdf>) and to the *Architecture Heritage Protection Guidelines* (2011) published by DCHG (<https://www.buildingsofireland.ie/app/uploads/2019/10/Architectural-Heritage-Protection-Guidelines-for-Planning-Authorities-2011.pdf>) in the appraisal and description of historic designed landscapes, demesnes and gardens.

### **Vernacular Architecture**

Vernacular architecture is rooted in our traditions and accumulated wisdom and encapsulates our identity. It is characteristic of local communities and environments. Many vernacular houses and farmyards are maintained with pride by their owners, while contributing to the aesthetic appearance of the landscape, with benefits for wellbeing, tourism and the local economy. Importantly, our vernacular architecture also contributes to the world's cultural diversity.

The majority of surviving vernacular buildings, date from the eighteenth and nineteenth centuries, although older examples are also known; the majority of unnamed buildings on the early Ordnance Survey maps are vernacular. Due to the spread of urban centres previous stand-alone structures may have merged with the urban conglomeration and awareness of their importance is diminished. Houses are commonly small and single-storey, but may be lofted, and there are two-storey examples; all have relatively low wall-head and door heights and small, irregularly-placed windows; and many have corrugated-iron roofs (perhaps over thatch). The interiors of such houses, particularly the old kitchen and hearth, are essential to their character. Other building types include the most numerous, farm buildings, but also include, for example, settlements and groupings of farmyards, small-scale industrial items (e.g. limekilns, mills, culm crushers), field systems and lazy-beds, some piers/quays, boat



pens, field paths, mass houses, holy wells (and similar features) and stones and other natural features with traditional associations.

Vernacular buildings were constructed by the occupants, users and neighbours and thus no two can be exactly alike. This characteristic extends to house internal layouts, walling and roofing materials, farmyard forms, and even whole settlements. The vernacular tradition differs greatly from formal architectural design, this latter being created by professional builders and designers, influenced by imported styles, and includes most high-status dwellings, public buildings and even social housing.

Vernacular buildings, through their siting, orientation and materials, display an intimate connection with their landscape. Natural materials, including field or quarried stone, mud and sometimes local brick for walls; wattles for hearth canopies and partitions; straw, reed and other vegetable materials and stone flag or slate for roofs and floors; and timber from the bog or hedgerow are all distinctively local. Corrugated iron, despite its origins, has become part of the vernacular palette. Vernacular building crafts also have a local or regional character, and the work of the blacksmith, for example, is evident in hearth cranes, farm equipment and gates.

Vernacular materials and methods are most appropriate for the repair of vernacular buildings, but also offer potential for new work. Vernacular buildings are inherently good in terms of energy efficiency, with openings placed to maximise light but minimise heat loss, and thick walls that retain heat and gradually release it, and absorb moisture and release it easily, allowing them to 'breathe'. Some modern practices and products, such as use of impermeable materials and making spaces too airtight, can be harmful and simpler, low-tech solutions are almost always better.

Vernacular settlements survive in many counties, usually as farming or fishing hamlets and comprise small groups of houses and yards arranged in a deceptively haphazard manner. They frequently have an attractive visual character and atmosphere and some may have medieval origins.

Thatch covers some older (and some recent) buildings, but now often survives better under corrugated iron. Loss of historic thatch layers and roof structures also represents a loss for agricultural and botanical heritage. Regular maintenance is essential and costs can be considerable, although there is a thatching grant available from the Department of Housing, and the local authority, DCHG and Heritage Council might also provide financial assistance under their grant schemes.

Our stock of vernacular architecture has diminished alarmingly in recent decades, with many buildings neglected or replaced, due to changing aspirations and demands. Viable new uses and careful rehabilitation can contribute to sustainable development and encourage social and economic regeneration. The *Government Policy on Architecture 2009–2015* encourages the sustainable reuse of the existing building stock, whether or not such buildings have protected status, and this is particularly pertinent to vernacular architecture.



## **Policies and objectives in relation to Vernacular**

### ***In high-level introduction to development plan***

- Recognize that vernacular buildings are characteristic of our local communities and environments and contribute to their authenticity, and to their cultural, traditional, architectural, archaeological, historical and social interest and diversity.
- Promote the appropriate rehabilitation, revitalization and reuse of vernacular buildings, wherever feasible, employing best conservation practice and using traditional, especially vernacular, building methods and materials.

### ***Rural housing/settlement policy***

- Proposals for sensitive rehabilitation of disused vernacular houses will not be subject to the Rural Settlement Strategy for housing in the countryside that applies to new dwellings, assuming that their vernacular character is not compromised, that their fabric is repaired using appropriate techniques and materials, and that the structure was previously a dwelling. Where a building is derelict, measures should be taken to support and protect the building from collapse prior to and during works.
- There will be a presumption against the demolition of vernacular buildings where restoration or adaptation is a feasible option.
- To consider the uniqueness of vernacular buildings and ensembles in terms of their focused and specific relationship with their immediate environment as a model and guide for the development of modern design approaches in rural and other appropriate settings.

### ***Climate change and sustainability/energy efficiency***

- To recognize the inherent sustainability of vernacular buildings by virtue of their use of natural and renewal materials of local origin.
- To ensure the continued sensitive and appropriate rehabilitation and reuse of vernacular buildings in the interest of sustainability.
- To ensure the conservation and reuse of traditional materials in the interest of sustainability, good conservation practice and maintaining the long-term viability of such buildings and their associated features.
- The retention and careful rehabilitation of historic buildings in our landscapes, including vernacular houses and other structures, whether urban or rural, allows the materials and embedded energy of these structures to be harnessed for present and future generations. Removal and replacement of such buildings represents a waste of their embedded energy and such proposals should be subject to rigorous scrutiny.
- Where permission is sought to demolish a vernacular building on the grounds of structural defects or failure, or that it is not reasonably capable of being made structurally sound, such a contention must be convincingly demonstrated through a detailed report on the existing condition produced by a professional with appropriate conservation expertise and, preferably, an understanding of vernacular buildings. As part of such justification, details will be required of remedial works normally used in similar circumstances and setting out why these would not be appropriate.



- Where a building has been destroyed by fire or accident, the Council may consider demolition to be appropriate, but a report by a professional with appropriate conservation expertise, specifying the cause and extent of damage, will be required. As a minimum, a vernacular building proposed for demolition should be fully recorded to an agreed professional standard. If a disused vernacular house is demolished or replaced with a replica, the Rural Settlement Strategy will apply.
- Ensure that measures to upgrade the energy efficiency of vernacular buildings acknowledge their inherent vernacular characteristics, techniques and materials and do not have a detrimental physical or visual impact.
- Promote and support appropriate and well-informed energy efficiency upgrades to vernacular buildings through the dissemination of factual and relevant information to the general public.

#### **Rural development/farm diversification/tourism**

- Encourage and facilitate the sensitive reuse of vernacular houses or farm buildings for farm diversification, agritourism and rural development, including self-catering accommodation, arts or craft workshops and small-scale manufacturing. Guidance and information can be found in *Traditional Buildings for Irish Farms* (2005) published by the Heritage Council and Teagasc, and *Reusing Farm Buildings: A Kildare Perspective* (2006) published by Kildare County Council.

#### **Architectural heritage/conservation**

- To protect, maintain and enhance the established character and setting of vernacular buildings, farmyards and settlements.
- Development proposals affecting vernacular buildings will be required to be accompanied by a detailed measured survey, photographic record and written report carried out by a professional with appropriate conservation expertise and, preferably, an understanding of vernacular buildings. Early consultation with the planning authority is strongly advised.
- Facilitate appropriate, high-quality design solutions for adaptations of vernacular buildings that carefully consider their vernacular qualities in terms of design, scale, setting and finishes. While new design can be expressed in contemporary architectural language, consideration should be given to exploring the use of appropriate vernacular features, building techniques and materials.
- Where it is proposed to extend a vernacular house, the design, scale, footprint and materials should be sympathetic to the existing building and its setting. Extensions should generally be located to the rear and not obscure the form or layout of the existing building; substantial removal of walling is not generally recommended; connecting the existing building and extension should minimize the number of new openings and ideally use existing openings; sometimes, an outbuilding contiguous to a dwelling can be successfully incorporated.
- Promote the protection and maintenance of the character and setting of vernacular buildings, farmyards and settlements, including historic gateways, boundaries and other features.



- Ensure that developments proposed within or adjacent to vernacular settlements respect and enhance their spatial character, building forms, features, details and materials.
- Promote the protection and maintenance of thatched buildings (domestic or non-domestic), particularly those with historic layers and roof structures.
- To maintain an up-to-date record of thatched buildings, promote available grant schemes and facilitate engagement with owners in the maintenance of these buildings.

#### ***Rural settlement/architectural conservation***

- Consider the protection of vernacular settlements by means of Architectural Conservation Area designation, promote the reuse of disused or unoccupied buildings within them, and ensure that developments proposed within or adjacent to vernacular settlements respect and enhance their spatial character, building forms, features, details and materials.

#### **New National Policy on Architecture**

The proposed new National Policy on Architecture, currently being drafted, will support high quality architecture which respects our collective cultural identity and past traditions of building settlement. The policy is an opportunity for the local authority to create the conditions for a high quality, low carbon and more resilient built environment for future generations. The policy will focus on five key themes – designing for climate resilience and sustainability; designing quality spaces for public benefit; respecting our past, shaping our future; leadership; knowledge and innovation – and BHP recommends that the five themes are included in the objectives and policies of the development plan to ensure the delivery and implementation of the policy.

#### **Heritage Ireland 2030**

Heritage Ireland 2030 is a new National Heritage Plan which will set out key principles and policies for conserving and managing Ireland's heritage over the next decade and more. The Plan is currently being finalised with a view to publication later this year.

Heritage Ireland 2030 will embrace and support existing policies and initiatives. It will provide further policy backing for the mitigation of climate-change impacts and the protection of biodiversity. It will build connections between related initiatives and ensure coherence in delivering its vision.

Heritage Ireland 2030 will also provide a bridge between our tangible built and natural heritage and our intangible heritage – our language and cultural traditions in their diversity – ensuring that important aspects of our identity do not lose their connection to the landscape and people from which they have evolved.

Heritage Ireland 2030 will strengthen many aspects of our powerfully diverse heritage. The strategy's delivery structures will allow all bodies which protect and manage Ireland's diverse heritage to engage constructively with each other, with other public authorities and with communities, enterprise and NGOs. Heritage Ireland 2030 will be delivered with community



engagement and involvement, with leadership and through cooperation and partnership. It will build stronger heritage partnerships, allowing all stakeholders to work together to better ensure its protection.

Heritage Ireland 2030 is formed around three themes: 1. Communities and Heritage 2. Leadership and Heritage 3. Heritage Partnerships and should be embedded in the LA Development Plan.

### **Nature Conservation**

These observations are intended to assist you in meeting the objectives and obligations that may arise in relation to European sites, other nature conservation sites, and biodiversity and environmental protection in general in the context of the preparation and implementation of the proposed County Development Plan (CDP) for 2022-2028. Their aim is to support and encourage the development of a CDP that integrates biodiversity protection and nature conservation into all aspects of planning in Leitrim. NPWS staff are available to discuss these observations and other nature conservation issues arising from the preparation of the CDP via an online meeting.

### **Planning framework and national policy context**

The preparation and implementation of the Leitrim County Development Plan (CDP) for 2022-2028 is undertaken within the framework of national policy. The Department takes this opportunity to highlight the national policies that recognise the importance of incorporating biodiversity protection and nature conservation into land use plans at an early stage, namely; The National Planning Framework (NPF) 2018, Northern and Western Regional Assembly Regional Spatial and Economic Strategy 2020-32, National Biodiversity Action Plan 2017-2021, All Ireland Pollinator Plan 2015 -2020 and the National Peatlands Strategy 2015.

All of these policies, and strategies contain explicit commitments to sustainable development and the pursuit of practices aligned with no net loss of biodiversity and a low carbon society. They also emphasise the importance of taking an integrated approach to understanding the role the environment and natural landscape plays in the quality of life indices, water quality, economic prosperity, food production, recreational opportunities, tourism visitors, sense of place, and the overall distinctiveness and differentiation of localities. Moreover, these plans recognise that our natural resources are non-renewable and that we must protect them first, and then seek to leverage them sustainably. These principles should cascade down into the Leitrim CDP.

The Department welcomes the inclusion in the issues papers of key sectors that impact the environment and nature conservation.

### **Agriculture**

The recognition of the constraints to the further development of agriculture within the county (soil types and fertility levels) is welcomed and the formal recognition of the county's





capacity and potential for high nature value farming is especially welcomed by the Department. Leitrim is well positioned to take advantage of the European Green deal which has tied future CAP funding to the greening of agriculture including organic production and nature friendly farming.

### **Forestry**

The Department welcomes the acknowledgment that the levels and density of afforestation are particularly significant in Leitrim. While the development of forestry in Leitrim is welcomed, low species diversity, poor woodland design and unsustainable management practices have resulted in negative impacts on biodiversity and nature conservation in the county. The 2017 figures suggest that 11.6% of county Leitrim is under Sika spruce plantation that is managed via clear fell. The Department recommends that the proposed landscape capacity assessment includes dedicated sections on the capacity of nature conservation interests and biodiversity to continue to absorb large scale conifer afforestation. Furthermore, consideration should be given to developing county level thresholds that support the conversion of existing conifer plantations and or the creation of new native woodlands (managed via continuous woodland cover) as a counterweight to historic forestry practices in the county.

### **Green infrastructure**

The Department welcomes the identification of 'Green Infrastructure' as a dedicated section in the proposed CDP. Multifunctionality is a feature of this infrastructure type, however, issues can arise when the principal purpose of such infrastructure is ambiguous or unclear. The Department recommends that the EU definition is used: "a strategically planned network of natural and semi-natural areas with other environmental features designed and managed to deliver a wide range of ecosystem services' in both rural and urban settings (EC, 2013a)". It should also be noted that although natural processes typically support the ecology of native flora and fauna there are circumstances where assigning dual purposes to protected species and habitat can have an adverse impact. Consequently, where nature conservation is the primary function of an environmental feature it should be acknowledged as such and there must be a recognition that this may constrain the exploitation of such features as green infrastructure for other purposes. For example, flood management and the maintenance of water levels in Lough Allen support numerous rare and endangered floral species that are listed on the Flora (Protection) Order (S.I. No. 356/2015).

Environmental sensitivity mapping (ESM) is a key step in the identification and designation of green infrastructure and the ESM web tool [www.enviromap.ie](http://www.enviromap.ie) is a valuable resource in that regard. However, the Department recommends that due consideration is given to the interpretation of results as well as the capacity and limitations of such modelling methods. Furthermore, the Department encourages the use of the Ecosystem Services Scoring approach in mapping wildlife corridors of hedgerows and trees to help inform the planning process during the lifetime of the Plan.

### **Natural Heritage**





The Heritage Plan 2020 -2025 is a valuable resource and framework to support informed planning decisions in the county and the Department compliments Leitrim council on this piece of work.

### **New housing strategy**

The Department welcomes the focus on compact growth within existing urban areas and reminds the council that nature and biodiversity can also to be encouraged in such urban zones.

### **Blueways and Greenways**

Whilst the development of such amenities is welcomed the CDP should acknowledge that there can be significant risks to biodiversity and nature conservation associated with the development of such trails. The National Greenway Strategy stipulates that greenways and other associated linear trails should be designed to take into account, and avoid where necessary, the sensitivities of natural heritage. Many greenways are akin to road developments, requiring extensive site preparation and infrastructure provision, and therefore the Department recommends that all such proposals be subject to a site selection process similar the site selection processes used for proposed road developments. The Department also recommends the need to apply the precautionary principle when undertaking environmental assessment of such proposals in particular those that are located within features of high ecological interest.

### **Renewable energy**

Notwithstanding the national drive to develop climate change resilience and renewable energy capacity the Department recommends that the CDP acknowledges that the citing of wind energy developments in upland areas may be subject to significant environmental constraints. Such limitations are underpinned by legal and national policy obligations to regulate the impact of wind energy developments on designated nature conservation areas, protected habitats, species and biodiversity in general.

### **Water & Wastewater management**

The Department recommends that the CDP explicitly acknowledges that Leitrim contains the upper catchment of the River Shannon and highlights the potential for pollution that enters this watercourse in Leitrim to disperse down the entire river course and significantly impact ecological features outside of the county. Accordingly, there is a specific onus on county Leitrim to develop and ensure sustainable and appropriate water management processes and mechanisms. Notwithstanding the transfer of water services management responsibilities to Irish Water etc. the CDP drives the future development of the county and by implication the impacts of such development are the responsibility of Leitrim County Council.

### **Protected Nature Conservation Areas**



Proposed Natural Heritage Areas: 35 proposed Natural Heritage Areas were identified in the existing County Development Plan which have not been designated. The Department recommends that the CDP includes an objective to protect these sites and to list them as core ecological features in the CDP. Consequently, NHAs, pNHA's and their site synopses and or the relevant habitats/species for which they are proposed or designated should be included in an appendix to the CDP. The Department also welcomes the inclusions of 'Biodiversity sites of Value' and 'Non-Designated sites' in the CDP and the recognition of these sites in the wider countryside.

### **Climate change**

Climate change adaptation is an opportunity to realise increased nature conservation protection throughout the county. This can be achieved through the recognition of the role of natural features in supporting key ecological processes via the green infrastructure concept. However, the Department takes this opportunity to highlight that flood protection works must be subject to environmental assessment notwithstanding any of the requirements for rapid, or unplanned flood response/ intervention. It is therefore important that the CDP should provide for flood protection measures to be delivered in a planned and strategic manner subject to environmental assessment. The CDP should also acknowledge that climate change mitigation and adaptation actions can, at times, conflict with nature conservation interests and due consideration to environmental constraints should be given in all such cases.

### **Biodiversity**

The Department works within the framework of the National Biodiversity Action Plan 2017-2021 to conserve and restore our biodiversity. Ireland is a signatory of the United Nations (UN) Convention on Biological Diversity, Strategic Plan for Biodiversity 2011-2020, and is fully committed to halting the loss of biodiversity and degradation of ecosystem services as set out in the EU Biodiversity Strategy to 2030. Although, biodiversity considerations should permeate through the entire CDP (including both rural and urban development planning) the Department recommends that a dedicated Biodiversity section is included in the CDP. This will assist Leitrim County Council in meeting the main objectives of the National Biodiversity Action Plan 2017-2021, the EU Biodiversity Strategy 2030, and the NWRSES (RPO 5.5) which are to, respectively:

1. Mainstream biodiversity into decision making across all sectors
2. Bringing nature back into our lives
3. No net contribution to biodiversity loss arising from development supported in this strategy

### **Invasive species**

The Department recommends that commitments are set out with respect to addressing the Invasive Species issues in the County and notes that key areas to be addressed can be identified via the Ecosystem Services Scoring approach.



### **Peatlands**

The Department recommends that the CDP includes strong objectives in relation to the protection of wetlands and peatlands within the County. In this regard, an objective to support the implementation of the National Raised Bog Special Areas of Conservation Management Plan 2017-2022 would be a valuable inclusion in the CDP. The Department also highlights that the term 'hydrological' should include both surface and geological hydrological processes which have been shown to be important in the context of bog habitats.

### Sustainable exploitation and development of nature through Tourism:

The Department notes and supports the NWRSES RPO's (5.3 and 5.5) that encourage the development of national parks /national recreation areas with high nature conservation value.

The Department acknowledges the commitment by Leitrim County Council to protect lakeshores from inappropriate development and recommends that this is reflected in the objectives relating to proposals to increase access to areas such as Lough Allen. These proposals should be assessed for impacts to biodiversity at the earliest stage of planning. The Department also welcomes objectives to monitor and manage any increase in water-based visitor numbers, to avoid significant effects on sensitive freshwater habitats and/or the disturbance of protected species. Furthermore, cumulative and in combination effects are particularly important in the assessment of effects to water catchments and the CDP should make it clear that these need to be accounted for in the environmental and ecological assessment of plans and projects that may affect freshwater habitats or species.

### **Environmental Surveys and data management:**

The Department also acknowledges the valuable environmental survey work completed by Leitrim County Council including; the Leitrim Swift survey 2020 and the county Leitrim wetland Survey 2019. The data collated in these surveys should be used as a resource to inform the CDP and future development strategies. Furthermore, large amounts of environmental data are collated in the process of undertaking environmental assessments (e.g. NIS and EIAR). This data is a valuable resource and the Department encourages Leitrim Council to investigate the development of a county or regionally held, publicly accessible repository for consultants undertaking environmental assessments.

### **Environmental Assessment:**

The Department takes this opportunity to highlight the importance of incorporating recommendations in the Natura Impact Report (NIR) and Strategic Environmental Assessment (SEA) into the CDP. Moreover, the preparation of an NIR, SEA statement and plan are not independent processes but linked processes that must interact and inform each other.

### **With regard to the Natura Impact Report (NIR)**



Please note that in relation to European sites particular emphasis is placed in our observations on the adequacy of data, information and analyses available in the NIR, and on the implications of the proposed development for the conservation objectives and integrity of the European sites affected. This is because an appropriate assessment must contain complete, precise and definitive findings and conclusions with regard to the implications of a proposal for the conservation objectives and integrity of a European site(s). Furthermore, certainty of outcome, informed by the best available scientific evidence, underpins the Appropriate Assessment process and there can be no lacunae. Consequently, statements and conclusions in the NIR must be supported by evidence. Specifically, conclusions and statements regarding long term effects on the resilience of habitats or species must be certain and based on the best available scientific evidence.

The Department recommends that the CDP includes dedicated objectives that reflect the NWRSES RPO 5.7 “Ensure that all plans, projects and activities requiring consent arising from the RSES are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate” and recognise the importance of Natura 2000 sites, the need to manage and conserve the Natura 2000 network and the international importance of the sites within the County. These objectives should clearly state the intention that all plans and projects flowing from the County Development Plan should pass the Article 6(3) test and avoid adversely affecting the integrity of European sites. It must also be clear that any derogation under Article 6(4) of the Directive can only be considered in exceptional circumstances which meet the strict requirements of the Directive in this regard. In addition, the Plan should acknowledge the strict protection, provided for by the Habitats Directive, which applies to Annex IV species (e.g. Bats and Otter) wherever they occur; and should provide for this protection to be fully implemented in any plans and projects arising from the Plan.

The Department notes that the 15km zone is commonly used in screening for AA and highlights that ‘likely significant effects’ can occur beyond 15km, specifically in relation to River SACs and also to sites designated as SPAs for bird species. The Department recommends that flight collision risks are considered in the NIR, for example, with respect to the movement of species between SPAs and migratory bird routes across, into and out of the county.

The Department highlights that proposed mitigation measures should be clear, concise, directly linked to the likely impacts identified, must be sufficient to avoid significant adverse effects to the Natura 2000 site in question, and should be capable of being implemented in full. Moreover, consent authorities can authorise a plan or project only if they have made certain that it will not adversely affect the integrity of a European site. This is so when there is no reasonable scientific doubt as to the absence of such effects.

#### **With regard to the strategic Environmental Assessment**

The Department acknowledges that a wide range of surveys are used to underpin the SEA and recommends that Article 17 Habitats Directive reports, Article 12 Birds Directive reports



and Ireland's 6th National Report under the Convention of Biological Diversity should be reviewed in the preparation of the Plan.

The Department would welcome a clear and specific monitoring plan to be included with the Strategic Environmental Assessment report that will clearly outline how it is proposed to record the impacts of the plan's implementation on biodiversity, both in terms of biodiversity loss and biodiversity enhancement during its lifetime. This type of monitoring during Plan implementation will allow for corrective action and intervention if environmental damage is noted. It also provides for a learning opportunity for practitioners and decision makers for future land use plans.

While monitoring can use existing sources of information including data collected by other government departments or agencies, the loss or enhancement of biodiversity due to development can only be adequately monitored and recorded through the planning process. The Department would welcome the publishing of monitoring reports and would be happy to provide nature conservation observations on the reports.

#### **General Assessment Guidance**

The impact of the proposed plan on the flora/ fauna and habitats present should be assessed with particular regard to: European sites, i.e. Special Areas of Conservation (SAC) designated under the EC Habitats Directive (Council Directive 92/43/EEC) and Special Protection Areas designated under the EC Birds Directive (Directive 2009/147 EC), other designated sites, or sites proposed for designation, such as Natural Heritage Areas and proposed Natural Heritage Areas, Nature Reserves and Refuges for Fauna or Flora designated under the Wildlife Acts 1976 as amended, species protected under the Wildlife Acts including protected flora, 'Protected species and natural habitats', as defined in the Environmental Liability Directive (2004/35/EC) and European Communities (Environmental Liability) Regulations, 2008 including Birds Directive - Annex I species and other regularly occurring migratory species, and their habitats (wherever they occur) and Habitats Directive - Annex I habitats, Annex II species and their habitats, and Annex IV species and their breeding sites and resting places (wherever they occur), important bird areas such as those identified by Birdlife International, features of the landscape which are of major importance for wild flora and fauna, such as those with a "stepping stone" and ecological corridors function, as referenced in Article 10 of the Habitats Directive, other habitats of ecological value in a national to local context (such as those identified as locally important biodiversity areas within Local Biodiversity Action Plan, the previous County Development Plan and various surveys undertaken since the previous Development plan was adopted), Red data book species, and biodiversity in general.

Further to the above, the Department recommends that an objective is included in the CDP that requires an 'Ecological Impact Assessment (EclA)' for any proposed development which may have a significant impact on listed rare and/or threatened species.

#### **Useful Resources and References**



1. The National Parks and Wildlife Service website has recently been updated and should be consulted with regard to the impact of planning and development on nature conservation. The following link gives extensive details on the standards and content NPWS expect from referred plans and project applications.  
<https://www.npws.ie/development%20consultations>
2. The EUROBATs1 and Dark Sky lighting recommendations which provide valuable information on reducing the impact of lighting on wildlife.
3. The Departmental guidance document on Appropriate Assessment is available on the NPWS web site at <https://www.npws.ie/development-consultations>
4. The EU Commission guidance documents entitled "Managing Natura 2000 Sites - The Provisions of Article 6 of the 'Habitats' Directive 92/43/EEC" and "Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC" which can be downloaded from;  
[https://ec.europa.eu/environment/nature/natura2000/management/guidance\\_en.htm](https://ec.europa.eu/environment/nature/natura2000/management/guidance_en.htm)
5. CJEU and Irish case law has clarified some issues and should also be consulted when considering the implications of the proposed development with regard to European sites. Some valuable references to EJEU case law can found at:  
[https://ec.europa.eu/environment/nature/info/pubs/docs/others/ECJ\\_rulings%20Art%20%206.pdf](https://ec.europa.eu/environment/nature/info/pubs/docs/others/ECJ_rulings%20Art%20%206.pdf)

It is important to note that these observations are not exhaustive, and are made without prejudice to any recommendation that may be made by this Department in the future. Data collected and surveys carried out in connection with this proposed development may raise other issues that have not been considered here.

You are requested to send further communications to this Department's Development Applications Unit (DAU) at [manager.dau@chg.gov.ie](mailto:manager.dau@chg.gov.ie) (team monitored); if this is not possible, correspondence may alternatively be sent to:

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Is mise, le meas

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Connor Rooney  
Development Applications Unit

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