

13 December 2018

MSP Submissions,
Marine Spatial Planning Section,
Department of Housing, Planning and Local Government,
Newtown Road,
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By Email

To Whom it Concerns

Re: Submission on National Marine Planning Framework Baseline Report

ICOMOS Ireland is pleased to make this submission on the above Report. We welcome this report and the intention to set out an integrated planning policy for our marine landscape.

ICOMOS – An Introduction

ICOMOS, the International Council on Monuments and Sites, is a global non-governmental organization associated with UNESCO. Its mission is to promote the conservation, protection, use and enhancement of monuments, building complexes and sites. It participates in the development of principles and the evolution and distribution of ideas, and conducts advocacy. ICOMOS is an Advisory Body of the World Heritage Committee for the implementation of the World Heritage Convention of UNESCO. As such, it reviews the nominations of cultural world heritage and ensures the conservation status of properties.

ICOMOS is a network of experts that benefits from the interdisciplinary exchange of its members, among which are architects, historians, archaeologists, art historians, geographers, anthropologists, engineers and town planners.

Charters, Conventions, Guidance Documents and Principles

ICOMOS Ireland considers the National Marine Planning Baseline Report can only successfully address the challenges and opportunities implicit in our maritime territory – be they related to climate change, cultural tourism, leisure and recreation, infrastructure, protecting our resources, natural and cultural, etc. – if we acknowledge this territory as a cultural landscape, combining the historic and the contemporary as a single, albeit complex, entity with communities at the fore and engaging with both the tangible and intangible dimensions of cultural heritage which acknowledge and enable diversity and identity. In this regard, ICOMOS Ireland considers that the many relevant ICOMOS principles documents which it has produced, provide an essential framework for strategic and local planning, management, development and protection. Of particular relevance in this context are the following ICOMOS Charters, Principles, Resolutions and Declarations (all available at <http://www.icomos.org/en/charters-and-texts>):

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Directors: Gráinne Shaffrey (President), Paul McMahon, (VP), Nick Long (Treasurer),
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Mary-Liz McCarthy, Ivor McElveen, Caroline Engel Purcell, Grellan Rourke



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- International Charter for the Conservation and Restoration of Monuments and Sites (Venice Charter 1964)
- The (Australia ICOMOS) Charter for the Conservation of Places of Cultural Significance (the Burra Charter), 1982 and 2013
- Dresden Declaration on Flood Protection for Historic Sites, 2014
- The Nara Document on Authenticity (1994)
- Charter for the Conservation of Historic Towns and Urban Areas (Washington Charter 1987)
- Charter for the Protection and Management of the Archaeological Heritage (1990)
- Charter on the Protection and Management of Underwater Cultural Heritage (1996)
- International Cultural Tourism Charter (1999)
- Joint ICOMOS – TICCHI Principles for the Conservation of Industrial Heritage Sites, Structures, Areas and Landscapes (2011)
- The Valletta Principles for the Safeguarding and Management of Historic Cities, Towns and Urban Areas (2011)
- The Quebec Declaration on the Preservation of the Spirit of the Place (2008)
- The Paris Declaration on heritage as a driver of development (2011)

There are a number of allied international charters, conventions, etc., which should also be considered, and which align with the objectives and focus of the ICOMOS documents listed above.

- UN Sustainable Development Goals 2030: <http://www.un.org/sustainabledevelopment/sustainable-development-goals/> . ICOMOS International has established a Focal Group (with two ICOMOS Ireland members) focusing on Localising the SDGs.
- European Landscape Convention 2000 (<https://rm.coe.int/1680080621>)
- Habitat 3 New Urban Agenda: <http://habitat3.org/the-new-urban-agenda/>
- Convention on the Value of Cultural Heritage for Society (Faro Convention), 2005 <https://www.coe.int/en/web/culture-and-heritage/faro-convention>
- UNESCO Recommendations on the Historic Urban Landscape (2011) <http://whc.unesco.org/en/hul/> .

Marine Life, Cultural Heritage and Sustainable Development

Many of the above listed documents – ICOMOS and others - acknowledge the imperative for a sustainable, integrated and multi-disciplinary approach to spatial planning, one which recognises the priority of communities and the significance of local context. In particular we recommend that the National Marine Planning Framework, which this Baseline Report is intended to inform, should consider implementing a monitoring regime against the objectives of the SDGs. We note Goal 14 of the SDGs is to *Conserve and sustainably use the oceans, seas and marine resources for sustainable development*. ICOMOS at an international level, and in Ireland has been active in promoting localizing of the SDGs, holding a three-day event in Dublin Castle last April on the SDGs as they pertain to the many aspects of cultural heritage. This initiative brought a very wide audience drawn from within and outside the cultural heritage sector and allowed for open and construction cross-disciplinary/sector dialogue. Such approaches are, we recommend, essential to ensuring planning and management tools are sufficiently robust and aligned to the approaches required for a genuinely sustainable future, which takes on board the SDGs.

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Our Marine Territory as a Cultural Landscape – straddling seas, coast and land

We would encourage this Report and the future National Marine Planning Framework to incorporate the concept of cultural landscapes in conjunction with consideration of specific designated sites – be they natural, archaeological, architectural or urban in type. Cultural Landscapes allows for a more broad, inclusive and integrated understanding of our cultural heritage and embraces living landscapes/continuing landscapes which may relate to areas of our marine and coastal territories which contain layers of human intervention and continue to function and evolve as places of work, industry (ports and harbours), development. The National Landscape Strategy echoes this understanding, as do the definitions set out in the UNESCO Recommendations on Historic Urban Landscapes. This concept also applies to consideration of our industrial heritage landscapes – which includes our harbours, ports, coastal towns, many of our coastal monuments and more recent industrial heritage.

Utilising Digital Technologies

We welcome the inclusion in the Baseline Report of mapping tools and platforms including the Historic Viewers. We note there are a number of mapping sites which include mapping of designated sites, for example the Heritage Council's Heritage Maps viewer, and it we recommend the need for integration of information so that such information can aid more comprehensive analysis of existing conditions. We note the limited available critical cultural heritage data sets within some of the more strategic mapping systems, for example the OPW's Flood Mapping site. If the relevant data is not available and up to date, decisions may be made based on limited information and this will more likely lead to later complications, delays, etc or, worse, poor and irreversible decisions.

Communities to the Fore – enhanced engagement

While we welcome this opportunity to contribute to the process of such a significant plan for this country, we also acknowledge the very limited nature of the consultation process. ICOMOS supports the principles set out in the Faro Convention on the Value of Culture to Society (Council of Europe, 2005) and the ICOMOS Dresden Declaration on Flood Protection for Historic Sites (2004) which, amongst others, places communities (and there are many) at the heart of all planning processes affecting place and cultural heritage. Proper engagement requires greater and more open methods of communication and participation. We encourage the Department to implement best practice in future consultation in order to ensure wider engagement, acceptance and understanding in the long term.

Identifying, Mapping and Describing our Marine Landscapes

Using all the above noted tools, principles and approaches, we recommend the need for a comprehensive programme of identification, mapping and describing our marine landscapes. This should incorporate the broader definitions of cultural landscapes as highlighted already in this submission. It should aim to ascribe values and significances so that decisions for intervention, change, loss (in the context of climate change this will be a reality), can be made from properly informed perspectives. Communities should be involved in identifying these landscapes, values and significance.

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Integration

We recommend the Marine Planning Framework is integrated within spatial planning. We also recommend the need for cultural heritage expertise to be engaged from the outset in multi- and trans-disciplinary working processes to advance the National Marine Planning Framework and associated activities and plans.

Conclusion:

ICOMOS Ireland is a voluntary body of multi-disciplinary experts within the broad field of cultural heritage. The organisation is actively engaged at an international level within ICOMOS and is thus a significant body of knowledge and current thinking and practice which is disseminated at the local level and can be made available to government.

We trust that the information and considerations set out in this submission will be useful to the further refinement of the National Marine Planning Framework Baseline Report and its implementation. We would be pleased to be consulted further at any/all stages of this important process and would be happy to provide additional and direct contribution to the Department of Housing, Planning and Local Government on these matters.

Yours faithfully

A handwritten signature in black ink that reads "Gráinne Shaffrey". The signature is written in a cursive style.

Gráinne Shaffrey
President
ICOMOS IRELAND