

Submission on funding for and the structure of the **Built Heritage Investment Scheme**

1st August 2018



The vision of the Irish Georgian Society is to conserve, protect and foster an interest and a respect for Ireland's architectural heritage and decorative arts.

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Front Cover
Saunderscourt, Co. Wexford



Top and Right
Leixlip Castle Boathouse,
Co. Kildare

1. Introduction

The Built Heritage Investment Scheme (BHIS) was introduced in 2016 under the Government’s Stimulus Capital Programme with a fund of €2million. The scheme was intended to assist with the repair and conservation of protected structures, “to leverage private capital for investment in a significant number of labour-intensive, small-scale conservation projects”, and to “support the employment of skilled and experienced conservation professionals, craftspeople and tradespersons in the repair of the historic built environment”.

In 2017 funding for the BHIS was increased to €3.5 million with a further €1.5million for the Structures at Risk Fund. This helped to reverse the disproportionate reduction in public funding that had been experienced by the sector during the economic crisis that started in 2008. However, in spite of improved economic circumstances and a demonstrable benefit in investing in the historic built environment, funding for the Built Heritage Investment Scheme was inexplicably reduced by over one-third in 2018 to €2 million.

The Irish Georgian Society urges the Department of Culture, Heritage and the Gaeltacht to reinstate funding for the Built Heritage Investment Scheme to the 2017 level at the very least, and to undertake a review of the scheme so as to ensure consistency in the allocation of funding to local authorities and the awarding of grants for conservation projects. In doing so it is recommended that consideration is given to the following proposals.

- i. Levels of BHIS funding should generally be increased, at a minimum, to the 2017 allocation of €3.5 million.
- ii. BHIS allocations to each planning authority should reflect the size of the RPS in the subject jurisdiction.
- iii. A standardised approach should be taken to decision making by grant giving authorities. As will be noted in this submission, it appears some planning authorities limit grants to five or six applicants while others offer a larger number of smaller grants to applicants.
- iv. It should be mandatory that all local authorities advertise the grant scheme. Alternatively the Department could operate a nationwide publicity scheme to provide a more consistent approach.
- v. Ensure that announcements of grant awards are made no later than the end of February each year as it can be very difficult to complete the works and find builders/craftspersons within the stipulated time frames. The IGS allows a period of 18 months for the completion of works under its grant scheme. We would recommend that the Department consider allowing a similar time period for completion of grant-aided works.
- vi. Ensure that planning authorities are appropriately resourced to operate the grant scheme and have access to the necessary skills base. Sometimes a degree of hand-holding is required to ensure that applicants undertake works and engage builders in the appropriate manner. This may require the employment of additional conservation officers and/or the engagement of private-sector professional consultants as already happens in some planning authorities such as Dublin and Tipperary.
- vii. Make allowance for larger grants of say €15,000 to €50,000, and in exceptional one-off cases of up to €1,000,000, for buildings of major significance particularly where these are in public or charity ownership and are accessible to the public.

2. Key Issues

The following are the key issues the Irish Georgian Society wishes to highlight:

- i. Financial assistance available to owners and custodians of protected structures and historic buildings in Ireland is entirely and unjustifiably inadequate. Deficient spending in this area endangers Ireland's heritage assets, a non-renewable resource.
- ii. An adequately resourced, consistent and transparent Built Heritage Investment Scheme ensures that the state fulfils its undertakings as a signatory of international conventions, especially the Granada Convention, and its national policy commitments, such as those set out in Ireland 2040: National Planning Framework¹.
- iii. Increasing BHIS funding has the potential to yield disproportionately significant economic benefits and should be seen as investment rather than subsidisation of expenditure. Analysis of the outcome of previous similar heritage investment schemes indicates that grant aid can generate between two to four times the amount of public investment in private funds with corresponding increases in job creation. Overall, heritage and Ireland's historic environment is estimated to account for €1.5 billion or 1% of the state's Gross Value Added (GVA)².
- iv. BHIS funding helps to maintain the tourism resource be it historic buildings serving as tourist attractions, or simply the buildings that make up our historic towns and villages.
- v. BHIS funding will support the sustainable reuse of historic buildings and the improvement of energy performance of the historic built environment. The sustainable reuse and improvement of the existing building stock will be a critical part of Ireland's climate change mitigation strategy.
- vi. Increased funding and amendments in how the BHIS is structured and implemented (e.g. consistency of approach; size of grants; time frame during which works can be carried out) is likely to considerably improve the efficacy of the BHIS.

Below
O'Brien Column in Liscannor,
Co. Clare



1 *Ireland 2040: National Planning Framework*, 2018, Department of Housing Planning and Local Government
2 *Ecofys, 2011, Economic Evaluation of the Historic Environment Ireland*, Heritage Council



3. Built Heritage Investment Scheme (BHIS)

3.1 Funding the BHIS

The level of assistance and investment offered by the Government towards the conservation of our nation's architectural and built heritage has been seriously inadequate over the course of the last decade and regrettably has been reduced at a time when the economy is growing. While the Irish Georgian Society recognises that there are enormous demands on the public exchequer, we believe that assistance to owners and custodians of protected structures and historic buildings in Ireland is entirely and unjustifiably inadequate. We note with particular concern and disappointment that in 2018, the European Year of Cultural Heritage, grant assistance for protected structures through the Built Heritage Investment Scheme (BHIS) was cut from €3.5 million (2017 allocation) to €2 million.



Previous Page
St Carthage's Cathedral, Lismore,
Co. Waterford

Below and above
Ballinrobe House, Co. Mayo



3.2 Allocation of BHIS funds

The Irish Georgian Society is also concerned about the manner in which BHIS funds are allocated to planning authorities around the country and to that end we have undertaken a brief review of the BHIS in 2018.

Table 1: Irish Georgian Society 2018 BHIS Review Findings

Planning Authority	Record of Protected Structures (No. of Protected Structures)	Grant Allocation	Grant Allocation/RPS	Amount of Average Grant
Cork County	2943	€50,000	€16.99	€8,333
Tipperary	2716	€50,000	€18.41	€3,846
Dun Laoghaire-Rathdown	1948	€50,000	€25.67	€3,125
Westmeath	1682	€50,000	€29.72	€10,000
Louth	1528	€50,000	€32.72	€10,000
Galway County	1523	€50,000	€32.83	€4,167
Wexford	1490	€50,000	€33.58	€10,000
Dublin City	8691	€298,000	€34.29	€5,622
Meath	1436	€50,000	€34.82	€8,333
Offaly	1423	€50,000	€35.14	€3,125
Kildare	1417	€50,000	€35.29	€3,333
Kilkenny	1303	€88,000	€38.37	€6,286
Kerry	1240	€50,000	€40.32	€4,545
2018 Median Allocation – Total grant aid/total no. of protected structures – €45.06				
Carlow	991	€47,648.83	€48.08	€11,912
Limerick	2140	€108,000	€50.47	€3,000
Laois	923	€50,000	€54.17	€4,167
Clare	880	€50,000	€56.82	€3,125
Cork City	1481	€85,000	€57.39	€8,500
Fingal	783	€50,000	€63.69	
Waterford	1596	€104,000	€65.16	€6,118
Sligo	741	€50,000	€67.47	€4,545
Monaghan	700	€50,000	€71.43	€10,000
2017 Median Allocation – Total grant aid/total no. of protected structures – €77.09				
Roscommon	646	€50,000	€77.40	€4,545
Wicklow	700	€50,000	€82.24	€7,143
Longford	536	€50,000	€93.28	€4,545
Mayo	532	€50,000	€93.98	€6,250
Cavan	520	€50,000	€96.15	€4,555
Galway City	622	€67,000	€99.68	€13,400
South Dublin	428	€50,000	€115.97	€9,927
Donegal	384	€50,000	€130.21	€5,000
Leitrim	302	€47,000	€155.63	€11,750
Total	44,255	€1,994,285		

Note: Data for the RPSs have been sourced from accessible online sources. The size of an RPS can vary as additions and deletions are made by a planning authority and such adjustments may not have been included in the data above.

This table illustrates that the average grant allocation from the Government to each local authority is €50,000, with larger allocations to the cities of Cork, Dublin and Galway as well as the joint city-county authorities of Kilkenny, Limerick and Waterford.

The current allocations do not seem to reflect the needs individual LAs might have in encouraging and assisting with the protection of architectural heritage in their areas. As it stands, in most cases the BHIS allocation has no relationship to the number of protected structures in the planning authority. At a more complex level, the BHIS allocations appear to have no relationship to the architectural significance of the protected structures or the general condition and needs of the historic building stock within a planning authority's jurisdiction. Some counties will have large numbers of relatively standard terraced houses while others have a higher proportion of architecturally important country houses and churches with the result that they have different needs in terms of funding.

There are major disparities between the BHIS allocation and the size of the Record of Protected Structures in each planning authority. When the BHIS allocation is divided between the number of protected structures on the RPS this disparity is startling.

The planning authorities which receive the most generous BHIS allowance are:

Leitrim - €155.63 per protected structure
Donegal - €130.21 per protected structure
South Dublin - €115.97 per protected structure
Galway City - €99.68 per protected structure

By contrast, the planning authorities which receive the least generous allowance are:

Cork County - €16.99 per protected structure
Tipperary - €18.41 per protected structure
Dun Laoghaire-Rathdown - €25.67 per prot. structure
Westmeath - €29.72 per protected structure

On the basis of these figures it is apparent that Leitrim's allocation per protected structure is 9 times that in Cork County; South Dublin's allocation per protected structure is 4.5 times that in Dun Laoghaire-Rathdown; Cork City's allocation per protected structure is 3.4 times that in Cork County; and Galway City's allocation per protected structure is 3 times that in Galway County.

The current allocations appear to be inconsistent. For example, a simple boundary line between two neighbouring planning authorities can have a marked impact on the levels of grant aid which the owner of a protected structure can avail of to assist with maintaining and keeping in repair our nation's built heritage.

The average size of grants also varies widely between planning authorities. This is largely the product of the size of the BHIS allocation and the size of the RPS. However, it is also evident that some planning authorities appear to make a small number of grants while others appear to spread the allocation over a wider number of applicants. Such an inconsistent approach is difficult to understand particularly for grant applicants. The average grant in Galway City was €13,400 while the average grant in Galway County was €4,167. The average grant in South Dublin was €9,927 while that in Dun Laoghaire was €3,125.

4. The need for and benefits of BHIS grant aid

4.1 Obligations to protect our built heritage

While the primary responsibility for protecting our built heritage rests with the state, the majority of protected structures in Ireland are privately owned. Therefore, the often significant financial burden of maintaining and protecting these buildings for the public good is borne by private individuals. Furthermore, the owners of protected structures are legally obliged to ensure that these buildings are maintained and protected for the public good. Partly in recognition of this, a system of grant aid was instituted at the same time as the introduction of the 2000 Planning Act.

Below

Tea Lane Graveyard, Celbridge,
Co. Kildare

Article 6 of the *Granada Convention for the Protection of the Architectural Heritage of Europe*, drawn up by the Council of Europe, signed at Granada in 1985, and ratified by Ireland in 1997, recognises the need to support the private owners of historic buildings and states that each party undertakes:

- 1. To provide financial support by the public authorities for maintaining and restoring the architectural heritage on its territory, in accordance with the national, regional and local competence and within the limitations of the budgets available;**
- 2. To resort, if necessary, to fiscal measures to facilitate the conservation of this heritage;**
- 3. To encourage private initiatives for maintaining and restoring the architectural heritage.**



4.2 Benefits of Government support of the built heritage

State Obligations

BHIS funding ensures that the State fulfils its undertakings as a signatory of international conventions, especially the Granada Convention. The provision of increased BHIS funding also represents a definitive action that Government can take towards implementing National Policy Objective 17 the *Project 2040: National Planning Framework* in which the Government has committed to: *‘Enhance, integrate and protect the special physical, social, economic and cultural value of built heritage assets through appropriate and sensitive use now and for future generations’.*

Public Realm

The public realm and streetscapes is enhanced through repairs to facades, roofs, windows and shopfronts. Grant aid can in some cases assist in resolving issues with derelict buildings and urban blight, all of which helps to make our towns and villages more attractive places to live, play, work and shop for residents, business investors and tourists.

Engagement

The direct involvement of local authority Conservation Officers with the BHIS plays an important role in providing guidance and much-needed moral support for the owners of protected structures who often struggle to maintain these buildings.

Sustainability and Climate Change

Dry buildings are warmer buildings. The sensitive repair of a building can help reduce energy consumption in heating and running a building, thus helping to reduce our consumption of carbon. Grant aided repairs help to ensure that the embodied energy of an old building is retained and continues to be utilised into the future and help to reduce the consumption of carbon in building new houses. The re-use and continued use of existing buildings is inherently sustainable and grant aid assists with fulfilling commitments in this area. *The Greenest Building: Quantifying the Environmental Value of Building Reuse* published by the Preservation Green Lab (a part of the National Trust for Historic Preservation) provides that *‘reuse of buildings with an average level of energy performance consistently offers immediate climate-change impact reductions compared to more energy-efficient new construction’.* The document goes on to state that: *‘Most climate scientists agree that action in the immediate timeframe is crucial to stave off the worst impacts of climate change. Reusing existing buildings can offer an important means of avoiding unnecessary carbon outlays and help communities achieve their carbon reduction goals in the near term’.*

Built Heritage Condition

Our built heritage is left in better condition. Buildings are conserved or repaired. In many cases this removes a building from the risk of dereliction, collapse and loss of features and fabric of significance.

Functionality and Capacity

Grant aid can help address vacant and under-used buildings by bringing them back into beneficial use as homes, business premises and places for communities.

Tourism

BHIS funding helps to maintain the tourism resource be it historic buildings serving as tourist attractions, or simply the buildings that make up our historic towns and villages. The Heritage Council’s 2011 publication *Economic Value of Ireland’s Historic Environment* estimated that, including indirect and induced effects, *‘tourism expenditure attributable to the historic environment supports more than 17,000 (17,129) FTE employees in Ireland’ and that ‘[i]n terms of national income, this translates into an economic impact of approximately €650 (645) million towards Ireland’s GVA’.* The vital importance to rural tourism of maintaining and protecting built heritage is captured in Policy Objective 23 of *Project 2040: National Planning Framework*.

Economic Activity

BHIS funding should be seen as investment rather than subsidisation or expenditure. Our protected structures are assets not liabilities. The report of the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs the findings of the BHJL Scheme in 2014 found that the initial capital investment of €5 million by the state leveraged private investment of €10 million resulting in a total expenditure of almost €15 million. Other sources suggest that a multiplier effect of 3 and 4 is likely. BHIS funding is therefore a stimulus to the economy and a sustainable one at that. In 2014 grant aid generated 175 fulltime jobs which in turn generated income tax and expenditure on products and services which in turn generated vat and customs and excise dues for the exchequer. Overall, heritage and Ireland’s historic environment is estimated to account for €1.5 billion or 1% of the State’s Gross Value Added (GVA). (Source: Ecorys, 2011, *Economic Evaluation of the Historic Environment Ireland*, Heritage Council)

Conservation Deficit

A major issue in some parts of the country is the potential cost of repairing and refurbishing buildings. In some cases, the total cost of acquisition of a building and its renovation/repair, may exceed its eventual market value. This results in what is known as ‘Conservation Deficit’. In such cases, raising finance through bank loans can be difficult if not impossible. BHIS grant assistance can to a certain extent reduce the degree of conservation deficit, particularly in parts of the country which are more economically deprived than others.

Appendix: About the Irish Georgian Society

The Irish Georgian Society is a membership organisation whose purpose is to promote awareness and the protection of Ireland's architectural heritage and decorative arts. In 2018, the European Year of Cultural Heritage, the Society is proud to celebrate its 60th Anniversary having been established by Desmond and Mariga Guinness in 1958. The Society has a membership base of over 2,000 with its headquarters in Dublin, regional chapters in Cork, Limerick, Waterford and Birr, as well as chapters in London, Chicago, Boston and New York.

Since its establishment, the Irish Georgian Society has played a direct 'hands on' role in restoring Ireland's architectural heritage. Its greatest achievement is undoubtedly the saving of Castletown House, Co. Kildare, which was acquired by Desmond Guinness

and opened to the public 50 years ago this year. Most recently the Society has undertaken the refurbishment and restoration of the City Assembly House on South William Street, Dublin – first opened by the Society of Artists in 1768 as a purpose-built public art gallery.

For many years, the Society has regularly provided grant-aid towards the repair and conservation of historic buildings in both public and private ownership. These buildings have varied in type and have included vernacular buildings, town houses, follies, churches, lighthouses and country houses. Since 2014 in excess of €250,000 has been awarded to over forty conservation projects through country. For further information on grant-aided projects see <https://www.igs.ie/conservation/projects>.

Right
Selection of projects awarded grants under the IGS Conservation Grants Programme. Clockwise from top left: O'Brien Column in Liscannor, Co. Clare; Coadestone lion at Mote Park, Co. Roscommon; stained glass window of Agher Church, Co. Meath; thatched vernacular cottage at Lenankeel, Co. Donegal

