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From: [REDACTED]<[REDACTED]@gmail.com>
Sent: Tuesday 8 February 2022 17:10
To: CARBON BUDGET CONSULTATION
Subject: Consultation on Carbon Budgets ICOMOS Ireland

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Dear colleagues,

We broadly welcome the target of 51% reduction in CO2 emissions by 2030, en route to zero CO2 by 2050.

However, we are concerned with the practicalities of the plan which builds on defective audits and mechanisms:

- The failure of the technical documentation to mention the role and impact of our Built Heritage, including the very many (c38%) buildings built pre 1960, many without statutory protection.
- The energy embodied in a building constitutes 74% of its entire LCA consumption, yet current audits (including BER), fail to account for this energy.
- The persistence of unoccupied upper floors above commercial premises in our cities and towns represent a massive opportunity to help to resolve the housing crisis, whilst capitalising on this embodied energy bonanza, with potentially minimal transportation costs and contextual consolidation of urban communities.
- Linking the restoration of these buildings to tax incentives has failed to acknowledge the cash poor status of many owners of these precious assets (often complicated by inheritance or other fiscally related impediments), who through a lack of resources, are unable to invest in up front costs, or to avail of these incentives.
- This failure is a cost borne frequently by the occupier, not always the owner of the property, leading to severe poverty particularly in the face of the inflation of energy costs, both internationally and nationally.
- A deficit of some 50,000 skilled trades people has been identified within the building sector along. Inadequate initiatives are being developed to encourage trades people to up skill within the traditionally built construction sector, which also includes our built heritage.

We need to explore and undertake more imaginative measures, in this time of crisis, which could involve a raft of ambitious, statutory and fiscally innovation and commitments, including the introduction of Life Cycle Analysis, Compulsory Sale, coupled with Equity entitlements, coupling grants with low cost loans or mortgages, a complete overhaul of our skills and training sector and a moratorium on demolition.

We note moreover, the lack of ambition in respect of moving towards a zero carbon gas network through the provision of bio-gas from bio-methane, already heavily grant funded by other continental nations and which offers such great potential to our livestock producers, to eliminate carbon waste, slurry and bought in fertiliser use in a single measure. Such an inclusive measure could help to secure the commitment and support of the currently alienated farming lobby and acknowledges the rural nature of much of our population and vernacular community, landscape and economy, demonstrating further commitment to *UN SDG11.4: Supporting our Cities and Settlements*.

We would be grateful for acknowledgement of receipt of this submission in due course.

Yours faithfully

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