

1. Introduction

The Chartered Institute of Building (CIOB) is the world's largest and most influential professional body for construction management and leadership across the built environment.

We have a Royal Charter to promote the science and practice of building and construction for the benefit of society, and we've been doing that since 1834. Our members work worldwide, and across the island of Ireland in the development, conservation and improvement of the built environment.

We accredit university degrees, educational courses and training in universities and colleges in Ireland. Our professional and vocational qualifications are a mark of the highest levels of competence and professionalism, providing assurance to clients and other professionals procuring built assets.

The CIOB also has a dedicated policy and research function, whose expertise we have drawn on in the preparation of this response.

CIOB represents professionals who manage the creation, conservation, and improvement of the built environment. In Ireland, our members are the project managers, site leads, and technical experts responsible for delivering the goals of the National Development Plan and 'Housing for All'.

We view built heritage not as a static collection of monuments, but as a living, functional part of Ireland's infrastructure. To preserve this heritage while meeting modern housing and climate demands, the state must move toward a policy framework that values professional competence, workforce stability, and fiscal incentives for reuse.

2. Strategic Theme: Heritage and Sustainable Development (Objective T1)

Addressing Objective T1.1: Integrating heritage into broader policy areas (Climate & Circular Economy)

As we have outlined in our site of sustainability research papers, the most sustainable building is the one that already exists. However, current Irish fiscal policy often inadvertently encourages the demolition of heritage assets by making replacement financially comparable to restoration.

- **VAT Recalibration for Circularity:** Under the current tax structure, a reduced rate of 13.5% VAT is applied to demolition. This creates a perverse incentive where carbon-intensive demolition and replacement enjoy financial parity with sustainable repair. The CIOB recommends a recalibration: applying the full VAT rate to demolition while maintaining or further reducing the rate for the restoration and refurbishment of historic buildings. This would bring HI2030 into alignment with the Circular Economy and Miscellaneous Provisions Act 2022 and the Climate Action and Low Carbon Development (Amendment) Act 2021.
- **Stamp Duty Deferral for Retrofit:** To specifically target the vacancy crisis within our historic town centres, the CIOB proposes the introduction of a Stamp Duty Deferral scheme. This would allow a purchaser of a pre-1940s building to defer a portion of their

stamp duty payment on the condition that the funds are reinvested into a certified, high-quality heritage retrofit. This Green Flipping model would lower the initial financial barrier for individuals and small developers to take on complex heritage projects, ensuring these buildings remain part of a living community rather than falling into dereliction.

3. Strategic Theme: Heritage Management & Professional Standards (Objective T3)

Addressing Objective T3.8: Development of professional standards in heritage management

Heritage conservation is an increasingly technical discipline that requires high-level management expertise to navigate complex regulatory, safety, and material requirements.

- **Recognition of the Chartered Construction Manager:** The CIOB welcomes the findings of the 2024 Ministerial Review of Engineering Qualifications in the Local Government Sector (the Shane Tiernan Report). This review correctly identified that holding a Chartered Construction Manager (MCIOB) designation is equivalent to a Level 8/9 Honours Degree and demonstrates the high-level technical competence required for senior technical delivery.
- **A New Era for Local Authorities:** For decades, a "promotional ceiling" hindered technical staff within Ireland's 31 local authorities if their degree title lacked the word "Engineering," despite their role evolving toward complex project delivery. We recommend that the HI2030 Action Plan explicitly adopts Recommendation 11 and Recommendation 13 of the Ministerial Review. This ensures that professionals managing heritage and conservation projects in local government are recognized for their management competence (MCIOB), allowing for a broader, more skilled pool of talent to lead heritage initiatives at the local level.

4. Strategic Theme: Workforce Stability and Knowledge (Objective T3.12)

Addressing Objective T3.12: Cultivating the next generation of heritage professionals

The survival of Ireland's built heritage is at risk not just from physical decay, but from the loss of human skills and "organisational memory" within the construction sector.

- **The Impact of Job Quality:** Our research with TASC on Job Quality in the Irish Construction Sector highlights that the loss of skills following the 2008 financial crisis remains a major bottleneck for the industry. Heritage work is specialized and requires long-term commitment. However, "lowest-cost" procurement models lead to contractual instability and high staff turnover. To ensure a stable supply of heritage craftspeople and managers, the state must move toward Value-Based Procurement, where the quality of employment and the provision of professional training are weighted as heavily as price in tender evaluations.
- **Apprenticeship and SME Support:** Many heritage skills are held within micro-SMEs. Our response to the Apprenticeship Action Plan emphasizes that these firms face the

highest risks when taking on new learners. We recommend that HI2030 supports direct SME subsidy packages for traditional building skills. Furthermore, the state should consider a Shared Apprenticeship Scheme for heritage, where apprentices are employed by a central host and rotated through several specialized heritage SMEs to gain a breadth of experience without the burden of full employment falling on a single small firm.

5. Strategic Theme: Planning and Adaptive Reuse (Objective T1)

Addressing Objective T1.2: Promoting heritage-led regeneration

The CIOB's research '[Building Adaptably: how the construction sector can future proof Irish cities](#)' shows that speculative commercial real estate development in Irish cities often ignores the potential of existing heritage stock.

- **Incentivising Adaptive Reuse:** We urge the Department to utilize the findings of our Adaptability Report to create a clearer planning pathway for the conversion of underused or vacant commercial heritage buildings into residential units. This involves addressing the 'present bias' in our current construction model, whereby buildings are built in a way that form rigidly relates to function, to a more open, adaptable building model which allows buildings to fulfil different functions throughout their lifespan. To achieve this change, we recommend mandating for adaptable building design in city and town centres through city development plans.
- **Town Centre First and CPOs:** In our response to the National Planning Framework (NPF) 2024, we highlighted the success of dedicated Compulsory Purchase Order (CPO) teams in other jurisdictions. We recommend that HI2030 supports the creation of dedicated heritage-focused CPO teams within local authorities, specifically tasked with identifying and acquiring chronically vacant historic properties to bring them back into productive use through professionalized management.

Conclusion

The Mid-Term Review of Heritage Ireland 2030 is an opportunity to move beyond preservation and toward active, sustainable management of our built environment. By implementing these professional and fiscal reforms, the Department can ensure that Ireland's heritage buildings are safe, sustainable, and capable of meeting the housing needs of the 21st century.