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The Royal Institute of the Architects of Ireland
The Registration Body for Architects in Ireland

31st March 2017

NPF Submissions
Forward Planning Section
Department of Housing, Planning, Community and Local Government
Custom House
Dublin D01 W6X0

Our Ref: PJ/RIAI UDC-Let-005/pj
By e/mail and post.

IRELAND 2040 – OUR PLAN: NATIONAL PLANNING FRAMEWORK.

Dear Sirs,

On behalf of the RIAI President, Carole Pollard and the Members of the RIAI, the RIAI wishes to acknowledge the opportunity to make a submission the National Planning Framework – Ireland 2040, both as an institution representing Registered Architects in Ireland, and also as a member the National Planning Framework Advisory Group.

Attached to this letter, we include the RIAI submission.

If you have any queries or seek clarification on any or all of the points made in the submission, please contact the undersigned, directly.

Yours sincerely,

Joe Miller,
Practice Director,
RIAI,
8 Merrion Square,
Dublin D02 YE68



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Fionnuala May (Second Vice President), David Browne (Honorary Treasurer), Dermot Ryan (Honorary Secretary),
Grainne Dunne, Michael Murray, J. David Power, Derek Tynan

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Dear Sirs,

IRELAND 2040 – OUR PLAN: NATIONAL PLANNING FRAMEWORK

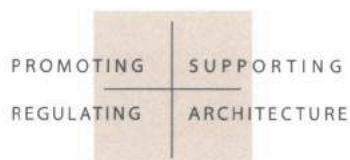
RIAI a Member of the Advisory Group.

The RIAI welcomes the preparation of the new National Planning Framework (NPF) and is pleased to be part of the Advisory Group. We have set out our comments below on the 'Ireland 2040 – Our Plan: Issues and Choices' consultation documents.

The RIAI consider that the 'Ireland 2040 – Our Plan: Issues and Choices' issues paper is a very positive document and that many of the points we raised have been taken on board. It is most encouraging. In particular it recognises that the continued concentration on Dublin at the expense of the rest of the country is not sustainable, and that a more equitable, balanced approach is needed, and that it recognises that 'place-making' - improving the quality of our towns and villages is at the heart of achieving this. The RIAI also welcomes that the NPF needs to consider all-island and cross-border issues. Key questions to be addressed are how these objectives are to be achieved effectively, and what supports are needed for policies of place-making and improving the attractiveness of towns, etc. to be successfully implemented.

Response as Part of the Advisory Group.

As part of the NPF Advisory Group the RIAI has already responded to request for submission '*to set out, in order of priority, the principal areas for the NPF to address, in order to effect change*'. Our submission is still relevant and attached as an appendix.



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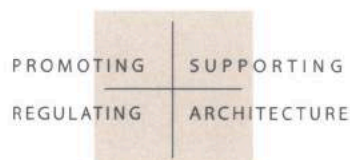


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We have also already submitted key points for the NPF as part of the initial consultation process. These are still relevant:

- development of sustainable policies to manage urban growth through consolidation of existing cities and towns rather than expansion, to secure and protect our rural natural environment and resources.
- consideration of the implications of scenarios beyond the 12 and 24 year periods referred to in Section 3 of the consultation document 'Towards a National Planning Framework' and to consider a 50+ year scenario particularly to safeguard future infrastructure requirements.
- Consideration of the close economic and social relationship with Northern Ireland and its implications and potential for the different range of border areas as well as nationally.
- The NPF should form a central component of the 2050 National Mitigation Plan for a Carbon-free Society. The decisions made now in respect of settlement, transport and energy in the NPF will have a strong bearing on the success of the 2050 Plan.
- The NPF should include an evidence based plan for human settlement, transport, energy and preservation of amenity, building on the strengths of the economy, and not seek to achieve unrealistic or extravagant outcomes – a fault of the previous NSS.
- The NPF should prioritise the allocation of resources, in order to maximise the return on the investment in infrastructure, on the basis of objective evidence.
- National transportation planning must be integrated into the NPF. In particular, planning of integrated, high quality transportation systems, both road and rail, must underpin the settlement goals of the NPF.
- The NPF should be supported by whole of Government, including the Departments of Finance and Public Expenditure, if it is to achieve its goals. Any future incentive schemes should support the NPF and not serve to undermine it, as was the case with the NSS (e.g. the then Government's public sector decentralisation scheme or the tax incentives encouraging the building of thousands of new houses in certain rural areas where there was no need or demand).



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- Existing policy on development of new settlement in rural areas should be re-assessed – such development has been at the expense of rural towns and has become a costly impediment to the installation of necessary national infrastructure, such as new roads and electricity transmission lines.
- The National Landscape Strategy should form part of the NPF.
- The consistency of county development plans with the NPF must be assured, possibly by establishment of the office of Planning Regulator.

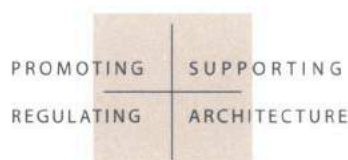
High-quality, High-density Housing.

- The importance of good design goes hand in hand with the need to develop our urban areas to accommodate the projected increase in population. The need for high quality architectural input into new development should be emphasised. High-quality, high-density housing is one of the solutions for projected housing demands in urban areas. Architect-led policy is key to the delivery of high density housing which supports and nurtures sustainable urban communities.
- The NPF should be informed by effective trans-national and city-regional planning models that develop an integrated, stable, growing society and economy, to maximise international competitiveness for the mutual benefit of all.

The NPF Vision – Realistic Structures for Ireland.

The RIAI considers that the NPF needs to be bold and visionary. It should be a high level document which sets out clear policies and strategies that are needed to be in place and implemented in order to achieve the outcomes that it aspires to, and it should include an Action Plan to deliver these outcomes. The Action Plan should refer to separate guidance that needs to be in place to support delivery.

The NPF must also set out a strategic and realistic spatial structure for Ireland that has regard for the strengths and resources of each area on its actual merits rather than set out artificial and unachievable hierarchies. The country's spatial structure should not be framed as a rigid division of administrative areas, but as a series of dynamic, overlapping areas based on the varied physical, economic, environmental and geographical characteristics that exist. These include, for example, the Greater Dublin area, the Greater Cork area, the Shannon Basin, the Atlantic coast, the Kilkenny/Wexford/Waterford 'three sisters' region. These examples all operate across the regional



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administrative boundaries set out in the Consultation papers, but need to be considered as cohesive and collective entities thereby informing the type of development and place-making characteristics that are appropriate and possible.

Further Growth of Dublin and Equitable Growth Around the Country.

It is imperative that the NPF encourages further growth of Dublin to maintain its position as an attractive, international and competitive economic region, through consolidation and developing and utilising all public transport possibilities. The NPF should also encourage more equitable growth around the country to balance that of Dublin. It is essential that people should not have to commute more than 20-30 minutes between work and home. Land use, public transport policies and service provision need to be carefully aligned to achieve this, not just with new development to allow growth, but to retro-fit our cities, towns and communities to reduce the continuing unsustainable dependence on private transport, overcome the high costs of dispersed service provision and to deliver our international commitments and promises to address Climate Change. These should be policy priorities that apply nationally across the country. Efficient public transport networks are essential to ensure the growth of 'second tier urban centres'.

The NPF and Infrastructure Provisions.

The NPF needs to address infrastructure provision, particularly the need for connectivity between places – good transport infrastructure, ease of accessibility, service provision and communication to ensure greater economic and social equity across the country. Particular consideration is needed with regard to any proposals intending to improve connectivity between Dublin and the rest of the country through improved rail and road infrastructure to assess whether these will exacerbate or overcome the existing problems of over concentration on the Greater Dublin area. The provision of transport infrastructure needs to be carefully and effectively considered so that there is a good attractive network across the country, so that people are within easy reach of other places – it needs to be a reasonably equitable system to achieve the objectives of more even distribution across the country.

The NPF should give special consideration to addressing the problems associated with the decline of our rural communities. We consider that some consolidation and sharing of services between communities, and different local authorities, is essential. Creative approaches will be needed to achieve this.

We consider that the NPF has the potential to be an important tool for Government to support and deliver on its environmental, economic and social policies and objectives, including better place-making, sustainable communities and well located development. To achieve this, the NPF should be an integrated plan for all parts of Government and its agencies. The NPF should establish the spatial



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planning context for the work and actions of Government and its agencies. It is essential that the NPF is led and supported within the Government at all levels, that it is focused, evidence based and monitored with regular reviews (possibly every 5 years).

Delivery of the Plan requires clarity, commitment, expertise and resourcing. In this regard the Action Plan can set out priorities and programme, which can then be financed and resourced. In this regard the RIAI considers that the architectural profession can make an important contribution to enabling delivery of the NPF policy and objectives. In particular, we welcome the emphasis on good quality place-making as the basis for maintaining and creating sustainable communities. To achieve this:

- Government needs to actively promote the economic benefits of good quality place-making within Government and across all its agencies to achieve the policy objectives of improving quality of life and attractiveness of place, while also reducing healthcare and environmental costs. Adoption and Implementation of a pro-active approach - similar to the Scottish Government's 'town first' policy, which requires that all state bodies are required to prioritise improvements to the town in making decisions such as location of schools, healthcare, state support structures including employment offices, local authority offices, garda stations, etc. - would benefit from architectural expertise with regard to managing development and public investment in a way that consolidates and improves the quality and attractiveness of our towns and communities, both physically and economically.

Architects with Planning Qualifications.

- Architects with planning qualifications and expertise are ideally placed to lead strategic planning across all areas of local government. In order to deliver the 'quality of life' element of the NPF - which is the core driver - quality of design must be at the forefront. Design is not just about aesthetics, but how things function and fulfil the needs of society. Architects must have input across all departments of local authorities - planning, transport, roads, housing, and parks. It is important that strategic design thinking is employed at every level, from village renewal schemes to county development plans.

Investment by Local Authorities.

- Local authorities need to be directed and provided with the resources to invest in their in-house architectural and planning divisions to ensure that architects, planners and engineers collaborate together at all stages to achieve the best quality outcomes for our towns and communities. Similarly, through utilising the skills of municipal architects with urban design skills, local authorities can ensure that development plans and proposed development fully address the health, well-being and prosperity of communities in an equitable way.



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- Architects can play a key central role in 'place-making' within municipalities and local authorities. It will be essential for the success of the NPF that this is recognised by Local Authorities and that resources from the Department are provided for dedicated Municipal Architects with Urban design skills within all local authorities if this is to be achieved.
- Planning authorities should be directed to and provided with the skills and resources to properly monitor the quality of design in applications for planning permission, and require that approval of planning applications can only be granted where a suitably qualified architect has been engaged (as is the case for works to protected structures).

Government Support for 'Pilot' Projects.

- The RIAI would like to see Government support of a number of pilot projects which would act as exemplars for future developments. Such pilot schemes could address issues such as urban infill to remove dereliction and improve the urban environment, suburban densification to improve the viability of local services including public transport, regeneration of towns to incentivise population growth and reinvigorate existing businesses and services such as post offices, village renewal to support community and increase visitor footfall and tourism.

The RIAI considers that these actions would make a significant difference to the quality of place-making as part of the implementation and successful delivery of the national Planning Framework.

Concluded RIAI - 31.03.2017

Preparation of this Submission was made by the RIAI President, Carole Pollard, and Philip Jackson chair of the RIAI Urban Design Committee, with contributions from James Pike.



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