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RIAI Submission on the Revision to the Draft National Planning Framework

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Draft First Revision to the National Planning Framework

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Observations:

1. The Vision

Chapter: 1. The
Vision

NPF Chapter 1: The Vision

National Policy Objective 1

Background context:

The Royal Institute of the Architects of Ireland (RIAI) supports the architectural profession, promotes the value that Architecture brings to society for everyone's benefit, and maintains the Register for Architects.

The RIAI Strategy 2023-2027 sets our core values: professional, progressive, collaborative, creative, and inclusive. These values promote an Architecture that inspires excellence, delivers sustainable, creative and resilient solutions to serve our people, society and our environment.

The development of planning policy in Ireland is of key vital importance and concern to The Royal Institute of the Architects of Ireland (RIAI) and its Membership.

RIAI Members are involved in the planning, design and delivery of the majority of public and private sector developments throughout the country and hold key roles in public and private sector organisations. Through their contributions in delivering quality individual buildings and quality placemaking, Architects are critical to translating planning policy into the built environment thereby contributing to the health and wellbeing of society.

Their daily interaction with the planning system means RIAI Members are uniquely placed to make an informed contribution to the development of Ireland's planning policy.

Furthermore, the challenges and effectiveness of the current planning system have a very direct effect on the work practices of RIAI Members.

With a projected population increase of up to 7.25 million (Report of The Housing Commission 2024) by 2050, there

will be significant additional pressure on our land, infrastructural resources and climate: challenging our community, environment and economic sustainability. The adaption and reuse of our existing built environment will play an increasing role in the sustainable provision of accommodation. The planning system should allow for our increasing and diverse population and the need to provide housing, industry, educational and healthcare facilities, and social and cultural amenities.

The current planning system in Ireland has two main components: Forward Planning and Development Control. However, as it aims to balance competing economic, environmental and social interests in the development of our built environment it has become unnecessarily complex, adversarial and inherently uncertain. There should be emphasis placed on forward planning rather than development management, a move away from a planning system that is reactive and moves towards a more proactive approach.

Long Term Vision

The RIAI believes that to successfully deliver on our national ambitions, we must have a longer-term vision, supported by a world class planning system, that will ensure sustainable and balanced economic, environmental, cultural and social development, and will meet UN and EU Green Deal carbon reduction targets.

The RIAI advocates for a forward-thinking approach that goes beyond short and medium-term plans to pro-actively manage 25 and 50-year scenarios that can be easily communicated and further developed with the wider public facilitating democratic consultation much earlier in the 'development management' timeframe.

Critical infrastructure such as public transport infrastructure, public water supply, non-carbon energy infrastructure must be prioritised and coordinated strategically to support long-term development, and public building infrastructure such hospitals, schools and housing would benefit from longer term planning strategies embedded into Plans at the Local and National level.

Commentary also pertains to National Policy Objectives (NPO): 2-5, 16, 32, 37-39, 43-47, 57, 58, 65, 67-91, 92-103

National Planning Framework

The RIAI supports the National Planning Framework (NPF) and recognises its strategic importance for future growth and development in Ireland. NPF objectives should be specific, measurable and realisable, with a particular focus on the benefits of good quality design. The NPF must be fully aligned to all other relevant government policies to provide coherence to the long-term vision. The NPF should be complemented by a robust economic plan to provide the means for its successful implementation.

The NPF must be agile and flexible over the course of its adoption to reflect future studies and reports. For example, the NPF should acknowledge and act upon the key insights made in The Housing Commission Report on restricting Dublin's growth and the unacknowledged financial & environmental costs of pushing housing growth in locations outside cities.

The RIAI also propose that with advancement in technology, the NPF can be linked interactively and visually to Regional and Local Authority Development Plans via an Integrated Spatial Planning System (3D Planning). This will enable every level of our 'Plans' to be communicable to the wider public, encouraging participation in small rural communities and in our cities.

Commentary also pertains to National Policy Objectives (NPO): 2-5, 32, 37-39, 43-47, 57, 58, 59, 67-91, 92-103

2. A New Way Forward

Chapter: 2. A New Way
Forward

NPF Chapter 2: A New Way Forward

National Policy Objectives 2 – 11

- **Please also refer to RIAI submission Notes under NPF Chapter 4**
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3. Effective Regional Development

Chapter: 3. Effective Regional
Development

NPF Chapter 3: Effective Regional Development

National Policy Objective

Support Regional Development

The RIAI supports sustainable regional development. Under Project Ireland 2040 and the National Planning Framework the change from “balanced regional development” to “balanced growth” including the alignment of spatial planning with capital investment and infrastructure delivery represents a welcome shift.

The long-standing ambition to balance regional development in Ireland, as a counterbalance to the Eastern seaboard, has had limited success, as the population growth targets of second tier cities have not been realised.

The RIAI supports the regionalisation and democratisation of planning and recommends the empowering, resourcing and autonomous funding of sub-national elected bodies such as the Regional Assemblies in developing more sustainable forward-planning models within and between the regions, bridging rural and urban, agriculture and industry.

The three Regional Assemblies have enhanced responsibilities and have demonstrated capacity to produce Metropolitan Area Strategy Plans, Metropolitan Area Transport Strategies and Regional Spatial and Economic Strategies but lack capacity to implement. The RIAI supports further study to address the deficiencies.

The Regional Assemblies have an important function in providing a structure for coordination with adjoining Local Authorities to leverage results from national bodies for example IDA, HSE, Irish Water, NTA, LDA, and particularly on regional projects such as flood relief, decarbonisation, bus/rail networks, motorways.

For structured regional development, growth must be conceived within a framework of 25/ 50 years, with a prioritisation of investment in regional infrastructure (including sustainable water, sewerage, energy, transportation networks,) to support the Government’s long-term ambition, carried through economic cycles, for the effective and affordable planning of places and communities. Climate directives, economic factors and infrastructure investment should be jointly considered within longer timeframes.

The RIAI believes that the development and growth of Dublin as a Capital city, should not be capped in terms of growth which will allow flexibility for the capital city to compete with other similar status cities within the European context.

Commentary also pertains to National Policy Objectives (NPO): 3-11, 12-22, 23-31, 43-48, 58, 59, 64, 65, 82, 87, 88-91, 92-103

4. Making Stronger Urban Places

Chapter: 4. Making Stronger Urban Places

NPF Chapter 4: Making Stronger Urban Places

National Policy Objectives 12 – 22

Compact Sustainable Development

The RIAI believes that critical to balancing the growing population's needs and climate change challenges is an urgent focus on planning compact sustainable development.

Our villages, towns and cities must be designed to provide ‘pull factors’ which attract the public to choose to live there, over unsustainable urban sprawl.

The RIAI strongly supports The National Planning Framework Policy Objectives 25 to 28, as a means of establishing towns and villages as an attractive alternative to isolated dwellings. These objectives need to be implemented to ensure villages and towns in rural Ireland are made more attractive as places to live and provide an alternative to dispersed one off housing.

Planned investment is essential to provide quality infrastructure and serviced land for development on brownfield and vacant infill sites within our existing settlements. Compact and imaginatively designed projects (such as those referenced in ‘RIAI Low-Rise Medium Density Housing 2024’) integrated into the community will help meet UN Sustainable Development Goals and well as providing better quality of life. All housing developments should be assessed for sustainability using the 4 pillars of sustainable development, namely Economy, Environment, Society and Culture – each have equal value.

Sustainable, livable cities should underpin Ireland’s urban planning objectives. There must be ambition for urban areas with excellent facilities and sense of place through plan led transformation of suburbia into a network of meaningfully connected and consolidated urban villages with an increased range of dwelling types and tenures, improved infrastructure and integrated employment, retail, leisure and service provision.

The RIAI strongly supports enabling Government incentives that address the issue of vacant homes and sites throughout the country. The performance of these incentives needs to be monitored and iteratively improved, including providing new or amending existing legislation, to actively reduce vacancy rates of over the shop accommodation.

Within the overall pattern of rural settlements (as distinct from areas under urban influence), the RIAI recognises the historic, societal and cultural significance of development (including appropriate single one-off dwellings) that will strengthen existing communities in a sustainable manner, but not adversely affect the character of rural landscape settings. The importance of the tangible and intangible heritage of rural areas as referred to by ICOMOS Ireland is also supported by the RIAI.

Consideration and monitoring (with reference to the Department of Housing, Local Government and Heritage document - Housing Need Demand Assessment- HNDA) must be given to the number and nature of rural dwellings leading to evidence-based decision-making that addresses issues including rural features, environment, sustainability, natural features and heritage.

Commentary also pertains to National Policy Objectives (NPO): 3-9, 11, 12-16, 20-22, 23-30, 43-48, 67, 68, 69, 82, 87, 92-103

5. Planning for Diverse Rural Places

Chapter: 5. Planning for Diverse Rural Places

NPF Chapter 5: Planning for Diverse Rural Places

National Policy Objectives 23 – 36

- **Please also refer to RIAI submission Notes under NPF Chapter 3**
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6. People, Homes and Communities

Chapter: 6. People, Homes and Communities

NPF Chapter 6: People, Homes and Communities

National Policy Objectives 37 – 48

- **Please also refer to RIAI submission Notes under NPF Chapter 3, 4**
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9. Climate Transition and Our Environment

Chapter: 9. Climate Transition and Our Environment

NPF Chapter 9: Climate Transition and Our Environment

National Policy Objective 67 – 91

Please refer to the RIAI 2030 Climate Challenge and Sustainable Design Pathways policy and guidance.

<https://www.riai.ie/discover-architecture/climate-change>

- **Please also refer to RIAI submission Notes under NPF Chapter 1, 3, 4**

10. Implementing the National Planning Framework

Chapter: 10. Implementing the National Planning Framework

NPF Chapter 10: Implementing the National Planning Framework

National Policy Objective 92 - 103

Integrated Spatial Planning

The RIAI supports the adoption of Integrated Spatial Planning (3D Planning) in Ireland. We have the opportunity, talent and expertise to move away from a simplistic and reductive 2D analysis and text-based plans, to adopt current EU best practice in forward planning, and support the coordination of municipal planning, financing and design models, civic partnerships and mutual learning.

The proposal involves a vision-led master planning model that addresses issues of place-making, green-infrastructure and compact growth supported by street hierarchies, building heights and densification in an integrated and interactive three-dimensional format. The model will increase public engagement and improve understanding by communities of the agreed future development in their areas. This will be empowering for society, enabling democratic participation and consultation, and where any appeals are forward loaded within the development time horizon, e.g. in Brisbane where if proposals are compliant within the 'Code Impact Assessment', then they are not subject to an appeal process. With the current system, later stage appeals within the application phase embed significant uncertainty, delays and cost.

Providing the ability for parties to view developments from different perspectives and explore in an immersive way, assists to *'engender a sense of presence that can further aid comprehension'* to *'being there'* (Shiratuddin & Thabet, 2011). The model goes far beyond maps and text in communicating complex spatial arrangements to all stakeholders.

Pre-lodgment consultation on interactive models would help to reduce adversity, uncertainty, risk and cost at the planning application stage, whilst speeding up the overall process. Facilitating an earlier window for appeals at development plan stage ensures earlier engagement bringing efficiency to the planning application process.

Strategic national interests on issues such as climate emergency, energy security, mass migration and the housing crises can be addressed in step with the Local Authorities to meet the needs of local communities.

The work of the 'Irish Cities Group 2070' which is promoted by the RIAI is considered as an exemplar for this type of forward planning.

Commentary also pertains to National Policy Objectives (NPO): 2-5, 11-15, 22, 47, 57, 59, 88-91, 92-103

Resourcing Government bodies and Local Authorities

The RIAI believes a key action to improving the outcomes of the planning system is the proper resourcing of our Local Authorities and Government bodies, to ensure they can deliver the greatest impact. They must be supported to enable a focus on Forward Planning which will shore up certainty and confidence in the planning system. As more resources are allocated to Forward Planning, less resources will be required for Development Control. The current tensions and uncertainties will be reduced as applicants, design teams and Planning Authorities work together within established parameters.

In line with Government and EU policy, every Local Authority should include architectural expertise as an essential resource. Currently over one third of local authorities do not employ Architects.

The RIAI supports resourcing areas of expertise within Local Authorities to enhance decision-making by suitably competent staff to provide clear and timely decision making at pre-planning consultation stage, and thus avoiding internal 'siloes' thinking, wasted effort and inconsistent interpretation across departments and local authorities.

The RIAI advocates for more architectural and urban design expertise in planning across all areas of the public sector, particularly Local Authorities. This will improve outcomes and have a positive impact on the quality of buildings and places as well as leading to a less adversarial planning process. At local level a multi-disciplinary collaborative approach is needed, with adequate provision for ensuring each Planning Authority has a balanced team with appropriate design skills to develop three-dimensional planning frameworks including architects at every level and in senior and leadership roles.

The RIAI supports the principle of subsidiarity within the planning system - decisions in planning should be made by those who are competent and empowered at the most appropriate level to ensure that local requirements, circumstances, and preferences are reflected, where such professionals have the expertise to analyse and draw considered conclusions, whereas the present system inhibits the exercise of professional judgement and flexibility by those who have an intrinsic understanding of planning and analysing the built environment.

Commentary also pertains to National Policy Objectives (NPO): 11- 15, 17, 18, 19, 21, 28, 29 ,47- 49, 57, 64,65, 88-91, 92-103

Value of Quality in Planning

A country's most valuable assets are its people and places.

Planning is not only about the placement, dimensions, sizing, or use of buildings. It is also very importantly about *place*. This is reflected in the *National Policy for Architecture's* use of the phrase *Places for People*. People interact with places. Places have meaning assigned to them, they trigger emotions and influence how people perceive, experience and value their built and natural environment. *Places for People* is about promoting and embedding high quality Architecture into the built and natural environment. A similar theme exists in the EU Commission's *New European Bauhaus* policy, which looks for design solutions that are sustainable, inclusive and beautiful.

The design and planning stage of a development is only a small part of the timeline, but it is the most crucial, as it is the stage at which the greatest value is created and embedded into the fabric of a development. It can exist as a place and part of the social fabric for hundreds of years. Therefore, the RIAI believes it is necessary to embed quality criteria in assessing planning applications to allow Architects generate solutions that add value to contribute to the overall economic, social, health, environmental and public welfare facets of communities.

Quality places create positive responses and emotions in people. They can help people to be more productive, improve health, create or enhance a sense of community, and evoke national pride. There are micro and macroeconomic benefits to creating quality places. Within this context, a quality designed home can improve the quality of life contributing to happier, healthier and more productive people. The high quality architecturally designed home or building or supporting infrastructure (including bridges, urban realms, cycleways and bus stops, etc.), as part of a quality masterplan for a town or city, can contribute to a place maximising its potential within the context of future sustainable growth.

An appreciation of quality placemaking, urban design and the built environment should begin with support for education and introduction of these concepts in primary schools and continuing through to adulthood, for members of society to play a more constructive and collaborative role in shaping value and quality in the built and natural environment.

Commentary also pertains to National Policy Objectives (NPO): 11, 12-15, 19, 22, 26, 28, 29, 92-103

Only Suitably Qualified Persons to Prepare Drawings Submitted with Planning Applications

The RIAI believes that, due to the negative effect that poor quality design and planning can have on health, the happiness of people, the economy and the community of a place, only suitably qualified persons should be permitted to prepare drawings for planning applications.

The RIAI sought legal opinion on this and believes that the most legally robust method for the introduction of such a requirement would be by amendment to primary legislation, most likely to *Section 33 of the Planning and Development Act 2000*, to expressly permit the Minister to make Regulations governing the qualifications of persons who prepare the drawings submitted with planning applications.

Commentary also pertains to National Policy Objectives (NPO): 11, 12-15, 19, 22, 26, 28, 29, 92-103

RIAI suggests key initiatives and actions for implementation:

- Propose the identification of a National Delivery Vehicle (e.g. LDA) to:
 - Drive the policy agenda, vision and forward planning with a long-range view
 - To co-ordinate all of the role-players coming together from fiscal, policy, socio-economic, planning and implementation across the sectors (LDA)
- Identify in consultation with stakeholders', suitable areas for 3D planning pilot projects, together with adequate funding and skills to facilitate consultation. The Integrated Area Plan process has been used successfully in Dublin city centre previously. This process could now be further applied to towns and suburbs aimed at both regeneration getting the right dwelling typologies to match projected demographics. This would involve:
 - An evidence-based brief.
 - Community involvement.
 - A 3D plan (or 'urban digital twin' enabling collaborative work) generated from an urban design swot analysis.
 - A new public realm plan to remake connections, greenways, improve parks etc.
 - Identification of key sites, uses, opportunities, dwelling typology imbalances
- Develop a methodology for tracking success.
- Develop a methodology for development of Quality Indicators.
- Exemplars of good public engagement in Planning -
 - Singapore has been developing a "Virtual Singapore" platform with main function to (NRF, 2018). "help officials make the best urban planning decisions and communicate with citizens by sharing information visually" (Dassault Systèmes, 2018).
 - East Campus Digital Twin pilot (as part of the Queen Elizabeth Olympic Park Smart District) by University College London (Dawkins et al., 2018)
- The Planning Control function must become a more enabling and collaborative process where enhanced outcomes result from combined effort to support the ambitions, policies and best practice.
- Identify exemplars of Compact sustainable development.
- Propose changes to educational curriculum to include Architecture, design and Planning.
- Promote 'lining up' of guidance documents, such that the hierarchy of National Policy to Regional (longer range) plans, Local Plans including Urban Area Plan, Priority Area Plans, Joint Area Plans and Urban Development Zones; can be defined quite clearly.
- Propose streamline the Planning application process:
 - Ringfence funding for ongoing review and improvements of online planning portals
 - Utilise evolving methods of project delivery including MMC
- Recruitment audit needs to focus on the expertise of people to ensure that the particular skillsets of Architects are included in all Planning Authorities. Promote the function of 'Municipal' Architect role within Local Authorities, to lead in innovation where local practices do not have funded research capacities.
- Propose implementation of proposed strategies for development at vacant first floors. Refer to Department of Housing publication - first issued in 2018 and second edition last year.
- Regional Local Authorities should have adequate supports in funding, technical resources, training and career

progression pathways to retain or bring in key skills and preserve high quality service.

- Amend Planning Guidelines to set standards for those making planning applications. Standardised practices should include pre-application consultations based on proactive and collaborative engagement, methodologies for Validation of Planning Applications to ensure that proposals are never so unacceptable as to merit a complete restart.
- Reinforcing conservation and heritage staff, the role of the 'Town and Municipal Architect' is a solution to address building vacancy and land underuse through urban regeneration, energy-upgrading and decarbonization. The RIAI recommends showcasing exemplar town revitalisation projects involving infrastructure delivery and public realm programmes which will illustrate the value of an Architects' input.

1. The Vision

Chapter: 1. The
Vision

Please see attached:

- Full RIAI Submission attached as a .pdf

- Appendix to submission

Attachments:

DHLGH-C1-244-488 - 240911 RIAI Response to Draft Revision to NPF v 03.1.pdf

DHLGH-C1-244-491 - NPF-01-FINAL_RIAI version 1.0.pdf

Boundaries Captured on No
Map: