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

Forward Planning Section,

Department of Housing, Planning, Community and Local Government,
Custom House,
Dublin,
D01 W6XO

10th November 2017

By Post and E/mail.

Re: RIAI Submission on the National Development Plan 2040.

Dear Sirs,

The Royal Institute of the Architects of Ireland wish to supplement their 31st March 2017 submission, with a further submission during the public consultation period, concluding on Friday 10th November 2017.

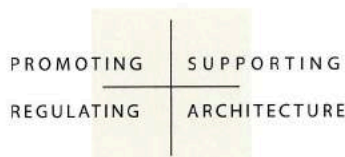
The RIAI welcomes this opportunity to make this submission, which is an expansion of the March 2017 submission, but also takes in to account the contents of the DHPCLG publication 'Ireland 2040 Our Plan Draft National Planning Framework'.

The RIAI note that many elements of their March 2017 submission has been incorporated in to the 'Draft National Planning Framework' and that fact is hereby acknowledged.

If you have any queries regarding the RIAI submission, seek clarification on any of the observations or recommendation, please advise the undersigned below, directly.

Yours sincerely,

Joe Miller,
Practice Director,
RIAI,
8 Merrion Square,
Dublin 2



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National Planning Framework – Ireland 2040

RIAI Submission on the Draft National Planning Framework

Date: 10 November 2017

Introduction relating to Preface 1: ‘A Vision for Ireland in 2014’ and the Skillset of RIAI Members.

The RIAI welcomes the publication of the Draft National Planning Framework which should have strong ambition and set targets for a number of key objectives.

This submission was developed by a number of RIAI specialist committees, including the RIAI Urban Design Committee, the RIAI Practice Committee, The RIAI Universal Design Task Force, The RIAI Sustainability Committee, Members of the RIAI Council, including the RIAI President Carole Pollard and the RIAI Executive.

The role and skill set of the RIAI membership is multifaceted, not just for the design of building, but also the design of place making of urban and rural places, conciseness of the structure, sustainability and survival of existing cities and towns, both urban and rural in Ireland. Furthermore the skill set relates to a knowledge of the design for access for all, irrespective of age group, the physical design of buildings and places, taking in to account numerous sustainability issues, such as climate change, re-use of waste, water, air quality, conservation of power, and transportation provisions relating to urban and rural future needs.

The RIAI feels that some of the key objectives and challenges for the NPF 2040 would be to achieve developed approaches in such areas as sustainable development, the management of economic growth, development and town planning growth.

The National Planning Framework – Ireland 2040 relating to Preface 2: ‘A New Way Forward’

The NPF should be considered in the context of a 100 year plan rather than a 20 year plan which is a very short period in overall planning terms. The quantity of change, impact and planning required to accommodate a potential increase in population of 4/5 million and a requirement for an additional 2 million homes could lead to different long term strategy and approach. Within the context of significant change in our understanding of our climate, environment, health and wellbeing, a radical transformation of how our cities, towns and villages will be planned for the future is required. Sustainability of our communities, quality of life and the environment should be at the heart of a new plan.

'Sustainability' will achieve social stability, sustainable economic growth, and planned environmental sustainability through design and research.

We must understand how we plan our cities, towns and communities to meet our national climate change obligations (to become a neutral carbon society by 2050 requires increasing population densities).

We must also understand how we plan our cities, towns and communities so that the older population demographic in this period will be able to live as independently as possible for as long as possible (this includes access to everyday services and facilities without assistance through enhanced urban amenity).

Both need to be clearly stated in the NPF 2040 as national strategic outcomes, and be incorporated into the National Investment Plan 2018-2027.

Manage Economic Growth: Preface 9 – 'Implementation and Investment'

Central government should ensure that adequate finances are made available for the 22 year period up to 2040 to implement a phased and steady flow of investment from 2018-2040, irrespective of the global and international economy. The government needs to prepare realistic, achievable economic, financial and fiscal plans to robustly underpin the National Planning Framework 2040. Without adequate finance, the plan will not work.

Infrastructure funding for existing controllers of finance such as HEA, HSE etc. should be channelled through, or co-ordinated to ensure the correct operation of controls. An National Infrastructure Authority should be made responsible for planning for adequate finances to implement a phased and steady flow of investment from 2018-2040, working in collaboration with Central Government and the Regional Assemblies.

Cities, Towns and Communities Plan Obligations: Preface – 2.5 'Should we Build Compact or Sprawling Urban Areas?'; 3.5 'Ireland Cities'; 3.6 'Ireland's Large Regional Towns'; 3.8 'Achieving Urban Infill/ Brownfield Development'

'The NPF seeks to consolidate our cities, towns and urban settlements, and focuses on the 5 main cities. There is little or no reference to mid-sized towns.

Section 2.5 of the draft NPF 2040 includes national policy objectives to consolidate our towns. However the urban development targets in National Policy Objectives 3a, 3b and 3c with at least 40% of all new residential development in existing urban settlements, 50% in the 5 main cities and 30% in other existing urban settlements are too low and suggest that between 50-70% of new residential development will be on green field sites, which will compound existing low density urban sprawl patterns, exacerbate stagnation of our inner cities and older suburbs, and continue the decline of our rural areas and towns. It will result in the permanent loss of agricultural land and

damage our food export economy. The RIAI's considered position is that these targets need to be increased to min 80%-100% to achieve the NPF objectives.

There should be a sequential requirement to show that there is no capacity within the existing urban settlement before green field development is allowed. Greenfield development should only be permitted as urban settlement extensions at densities that can sustain efficient public transport infrastructure.

RIAI supports NPF objective (NPO6) that supports regeneration of cities, towns and villages of all types and scale and NPO10 that states there will be a presumption in favour of development within existing urban areas, NPO11 and NPO12. However as stated above, the targeted growth needs to be much higher for these policies to deliver their objective.

These policies seek to address the major challenge of growth in our towns and villages. We must reverse the damage done by the motor car and to promote the benefits of living and working within them. There are successful examples, such as Tullamore, Kilkenny, Westport, Clonakilty, Skerries, Kildorrery and Birdhill.

We need to occupy all buildings within towns and villages and put plans in place for all towns and villages which identify such sites which have potential for development within the existing urban settlement, before we allow anything but farm-based development in the countryside.

RIAI also welcomes that the NPF considers intensification of existing urban settlements includes intensifying low density development that has occurred in and on the periphery of our cities which has either, by built form or by demographic change, become unserviceable. These areas will require high quality urban design masterplans with population densities to support services that are integrated into the surrounding settlement, Architects and Urban Designers have the specialist skills to address and arrest this situation of unsustainable place making. The problem will not be solved by patching the city with dispersed pockets of good quality intense neighbourhoods. No city should be allowed to expand beyond its existing boundary until it, in its self, forms sustainable place. Land is a finite resource.

The NPF Section 3.8 refers to active land management measures to support urban infill/brownfield developments targets by relocating existing space extensive uses to peripheral 'greenfield' locations. While these will allow development site intensification, it could encourage continued low density sprawl around existing urban settlements - the preference is for all development to be high density, with very little green field development.

Housing and the changing demographic: Preface 5 – People, Home sand Communities'

Provide for population growth an older demographic

Estimate based on ESRI estimate for 2030.

The growth estimates included in the NDF are much lower than recent estimates by the ESRI, which project a similar population growth by 2030. The ESRI figures have since been supported by the Ireland/ US Chambers of Commerce figures. (The table below shows projections based on the ESRI figures extended to 2040)

	2016	NPF 2040	ESRI 2040	Increase
Ireland	4.75 M	5.8 M	6.5 M	+1.75 M
Dublin	1.173 M	1.475M	1.75 M	+600,000
Eastern Region	2.3 M	2.8 M	3.15 M	+850,000
Southern Region	1.625 M	2.0 M	2.25 M	+625,000
North & West Region	825,000	1.0 M	1.1 M	+275,000

The Housing Agency recent conference in Dublin highlighted the need for 10,000 dwellings a year for the rapidly expanding housing sector requirements of the over 65s population. This would help to free up many existing houses for families with children, which comprise about 33% of all households, while in Dublin City, 66% of dwellings were originally family houses.

The policy on housing includes lifetime adaptable homes but there are many who would prefer a new location with social and care facilities, which can be accessed and used by the surrounding community. There are very good examples in the U.K. and Europe. There are also those who want to move back closer to City Centres and return from rural areas to towns and villages to be close to facilities.

The changing demographics in housing, based on the 2016 census carried out in Ireland is that 50% of households are occupied by 1 or 2 people.

Estimated nos. required (incl. 10% of existing stock replaced)	Ireland	+ 1.025M	NDF	+ 550,000
(mostly 1, 2 and 3 person dwellings)	Dublin	+ 400,000	NDF	+ 143,000

The key issue is to plan for populations at sufficiently high densities that public services can be provided with low infrastructure and running costs per person (including direct costs paid by individuals such as service charges, car running costs, etc.) This can be achieved by consolidating existing urban settlements including prioritising the reuse of existing buildings and redevelopment of existing vacant or underused lands within existing urban settlements rather than releasing greenfield lands. This is essential to delivering NPO29.

To achieve this, as set out in the NDF, the NPF should provide policy objectives for planning authorities to maximise population density targets in all existing urban settlements. This will require Planning Guidelines for Planning Authorities setting a sequential approach for residential development based on achieving sustainable population density in all urban settlements through consolidation, redevelopment of existing vacant or underused lands, and reuse of existing buildings. Evidence based research of comparable EU countries is required.

A greater increase in density must be achieved within all existing urban settlement area. Cities and towns should be clearly zoned into blocks and a typical default average required density should be zoned and mandated across all areas and blocks. (As currently exists in the Current Docklands SDZ). If some areas are to be designated low density (for historic or other reasons) then other areas immediately adjacent with the same zone will have to have higher density to compensate. The presumption should favour the higher density redevelopment and its design quality over the existing low density unsustainable development. The New Planning Framework Plan praises the achievements of the Dublin Docklands regeneration. Similar new types of plans/models should be developed for the regeneration and densification of other large parts of our cities (eg. Cork Docklands). We define 'blocks' as generally city blocks surrounded by main roads, or main streets in suburban areas.

RIAI Proposal for a National Infrastructure Authority/Agency

Government should establish a National Infrastructure Authority or Agency through to 2040 which could be sub-divided over four 5-6 year development plans and should be made responsible for planning for adequate finances to implement a phased and steady flow of investment from 2018-2040, working in collaboration with the central Government Agencies and Regional Assemblies.

The possible work of this new National Infrastructure Authority should include the following;

- Co-ordinate the decision making and implementation strategies of the Regional Assemblies
- Ensure that this plan is developed in a reasonably phased manner to meet a growing population and their needs
- Ensure that all critical infrastructure including road, rail, ports, airports, housing, hospitals, schools, universities, healthcare infrastructure, utilities, urban regeneration etc. is catered for and properly planned.

An architecture panel should be established within the National Infrastructure Authority (if this is set up) to facilitate focused strategic thinking on architecture and the built environment in the development and implementation of the National Planning Framework improvements to the national infrastructure at all levels.

A National Portal for all planning submissions and plans is now essential. Local authorities and An Bord Pleanála no longer have the required IT resources in-house to receive or disseminate important information on planning to the public competently in a readable or accessible on line format of the same quality as the submissions being made to it, or in a form that is current with the technology which is now widely available (Digital). All information developed by land surveyors, engineers and architects are all large digital files, in 3d and interactive formats and will be even more so within the next few years.

National e-Planning Strategy

- E-Planning has the potential not only to facilitate private citizens and corporate bodies to interact more easily and conveniently with planning, but also to greatly increase the speed and efficiency of the entire planning process. We support the need for

- National e-planning Strategy
- National Planning Portal / Database
- The Need for Evidence and Research /Data base with all Important Statistical Data available to the public.

This new National Development Agency should be a “Centre of Excellence” for all National, Regional and local planning using wide teams of fully qualified competent in-- house professionals and also teams drawn from the private sector. Mandatory collaborative multidisciplinary teams of specialists should be used to prepare masterplans, advise on all the necessary aspects of development plans, reviewing significant applications, for state infrastructure proposals (i.e. Universities, Hospitals, Schools, Apartments and large Residential developments). They should be fully competent in the latest technology and research in their respective fields. Evidenced based research in the best practice in urban and rural planning design should be a key part of the remit of these teams. They should be responsible for all Regional Master-planning, on LAP’S and to identify key infrastructure required to facilitate the plans.

Deficiency in the Draft National Planning Framework Regarding the Importance of Co-ordination of Public Transport.

There is little mention of development of a coordinated public transport network nationally which is necessary to achieve the modal shift to more sustainable transport and movement required to meet climate change targets. The omission of a public transport strategy with reference instead to road investment and electric vehicles, runs contrary to best practice planning as it encourages continued low density development/ urban sprawl.

The intention to change from petrol to electric vehicles alone is unlikely to achieve climate change targets, unless all the electricity can be generated from renewable resources - the cost of investment in the on-and offshore wind/wave farms needed to achieve energy requirements may be higher than the cost of investment in public transport, and limit the increasing higher demand for electricity from other users (businesses, households, etc.) which will increase dependency importing energy at higher cost.

In order to achieve sustainable mobility, as a National Strategic Outcome, the NPF should prioritise active movement such as walking, cycling etc. and their safety must be prioritised over cars within built up areas. This requires investment in high quality public realm and landscaping to improve urban quality, as well as investment plans for public transport networks.

RIAI Proposal for a Central Regional Assembly for Dublin

An additional Regional Assembly for the Dublin Region (incorporating at least the four existing local authority areas) with its own elected mayor should be considered to ensure focus on the issues specific to Dublin. If this is not considered feasible, consideration still needs to be given to consolidation of the four existing Dublin local authority areas under an elected mayor.

The NPF should consider separating Planning operations from general Planning Development controls which might allow for quality control and a more balanced approach to the running of the local councils in this specific area. Consideration should also be given to the possible use of external Planning consultants for a period which may alleviate workload difficulties within the Local Authorities.

The Planning procedures and Development in the Dublin Docklands were significantly more efficient, streamlined and effective and the outcomes of a higher quality and more certain because they were in the context of a prescribed masterplan. The SDZ system is attempting the same. The wide street commission also achieved significant transformation of Dublin city.

The Development of New Infrastructure including Bus Rail and Rail

The development of new infrastructure is the key to creating development in the right places to support the growth of our towns & cities road, rail and public transport are a major element coupled with policies to reduce car use, including improved provision for cyclists and pedestrians, and car-pooling.

Key improvements would be greatly reduced times on major rail routes, such as Dublin/Cork/Limerick/Galway. The existing four track line should be extended to Newbridge to facilitate this. A new high-speed link to Belfast, which enables the existing line to be used exclusively for commuter services and freight, is urgently needed.

There is a need to rationalise and improve our bus services and to coordinate them better with rail and Luas. Dublin needs additional Luas lines and/or the development of rapid bus corridors and these are also needed in Cork. In Dublin the immediate priorities are the DART underground and the Metro from Swords serving Dublin Airport extended to upgrade the Luas Green Line to Cherrywood connecting at Charlemont. This would greatly increase its viability and impact as highlighted in the original study.

Sustainable Urban Design - Preface 3: 'Making Stronger Urban Spaces'

Urban design is the process of designing and shaping cities, towns and villages; their streets, public spaces and landscapes. It gives form, shape and character to groups of buildings, public spaces, transport systems, services and amenities. Urban design is a collaborative and multidisciplinary process that involves many built environment professionals [including architects, planners, landscape architects, transport, civil and structural engineers], who will implement a National Planning Framework.

The quality of architecture and urban design has a direct impact on the health and wellbeing of residents, social inclusion and increased quality of life for all and is a reflection of the economic wellbeing of the country.

There does not appear to be any reference to either the UN Sustainable Development Goals or the New Urban Agenda as adopted in October 2016 by the UN at Habitat III and endorsed at the General Assembly. This Agenda is also aspirational but is grounded in a framework which allows governments and civil society to track its progress. The emphasis on inclusivity in the new Urban Agenda is evident throughout and it is an agenda which we should all embrace

Preface 3.8 - Infill and Brownfield Developments

The target of delivering at least 40% of all new homes nationally, within the built-up envelope of existing urban settlements is far too low. The target should be Dublin and other cities 100%, towns & villages 80%.

A decision should be made to build all the 800,000 new required homes in Dublin over the next fifty/sixty years, within existing circumference of the built-up area. A comparable city is Berlin, which currently has a larger population within a slightly smaller area, and yet could not be called an over-dense city. Barcelona has adopted a similar policy of containment for all future growth within the current boundaries and it is a much denser city.

A study should be set up to examine ways it can be achieved in Dublin and the other cities.

Densification does not necessarily need greater building heights. There are many infill developments in the Dublin Suburbs which achieve densities between 75 and 130/hectare with 3 or 4 storeys.

Achieving the 80-100% consolidation will require retrofitting existing residential suburbs to obtain the critical mass required to support sustainable neighbourhood hubs.

Research indicates that post war suburbs low density is due to large plot sizes and as such intensification would require the development of small plots of land in private ownership. This could be incentivised through the “smart growth” initiative / funding and support the development of small multifamily, multi-generational habitats creating diversity in size type and tenure. On the other hand estates built between 1990 and 2006 have a low density as a result of the road network/ hierarchy of distributor primary and secondary routes. Increasing the housing density and catchment in these neighbourhoods is primarily dependant on the reorganising and development on land in public ownership.

The NPF should include as an objective, the introduction of measures to retrofit existing residential suburbs in our towns and cities through:

- “smart growth” initiative / funding and support programmes for the development of small multifamily, multi-generational habitats including diversity in size type and tenure and
- Preparation of urban design strategies for the intensification of low density estates through reorganising and development on land in public ownership (eg. Limerick CCC Residential Design Code)’.

Diverse and Inclusive Ireland – Preface 3: ‘People Homes and Communities’

The draft National Planning Framework should include for the development of an accessible and inclusive built environment that contributes to respect for all human rights as set out in the UN Universal Declaration of Human Rights, the charter of Fundamental Rights of the European Union 2009 and the Equal Status Acts 2000-2015. This national and international legislation sets out the

principle of equal treatment irrespective of gender, civil status, sexual orientation, religion, age, race, national or ethnic origin or Traveller community.

The NPF should ensure that inclusion is a hallmark of all housing and communities and that the planning process includes the creative participation and accommodation of all including the new Irish, older people, the travelling community, young adults, children, and those with special needs, in how we plan for the future. We need to ensure that the places we create and housing we build suits the needs of all now and into the future.

More needs to be done to ensure that people with disabilities can access housing to suit their needs. The NPF should commit to ensuring that, within the lifetime of the NPF, an adequate supply of housing will be made available for older people and people with disabilities, across all tenures. National targets, that take account of the inaccessible nature of much of our existing housing stock, are required.

Concluded: RIAI 10.11.2017