



Tionól Reigiúnach Oirthir agus Lár-Tíre Eastern and Midland Regional Assembly

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National Policy on Architecture – Public Consultation

This submission on the National Policy on Architecture – Public Consultation has been reviewed by the executive and approved by the Cathaoirleach of the Eastern and Midland Regional Assembly.

The Assembly welcomes the publication of a new National Policy on Architecture which will promote and support national heritage and architecture, and focus actions on addressing key issues including societal well-being, climate change and urban regeneration. The actions of this policy will place high-quality built environment design at the heart of public service to support the strategic objectives of the National Planning Framework - Project Ireland 2040 (NPF).

Background and relevance for the development of a National Policy on Architecture

The Eastern and Midland Regional Assembly (EMRA) is part of the regional tier of governance in Ireland. It is primarily focused on the formulation, adoption and implementation of the Regional Spatial and Economic Strategy (RSES), oversight and coordination of Local Economic and Community Plans, management of EU Operational Programs, EU project participation, implementation of national economic policy, and additional functions through working with the National Oversight and Audit Commission.

In line with the provisions of the Planning and Development Act 2000 (as amended) the Eastern and Midland Regional Assembly (EMRA) made the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region on the 28th June 2019. The RSES brings together spatial planning and economic policy providing the environment for investment and in doing so it marks a significant policy milestone for not only regional government in Ireland, but also national and local government. The primary statutory objective of the RSES is to support implementation of Project Ireland 2040 – which links planning and investment through the National Planning Framework and ten-year National Development Plan (NDP) – and the economic and climate policies of the Government by providing a long-term strategic planning and economic framework for the Region. As part of this, it sets the context

for each local authority within the Eastern and Midland Region to develop their county and city development plans in a manner that will ensure national, regional and local plans align.

Central to the successful implementation of the RSES is the realisation of Regional Strategic Outcomes (RSOs), contained as part of the Strategy and defined as a mechanism to achieve the National Strategic Outcomes (NSOs) of the NPF. The RSOs are based around the three key principles of the RSES – Healthy Placemaking, Climate Action and Economic Opportunity.

The National Policy on Architecture Consultation Document highlights the importance of meeting the UN Sustainable Development Goals especially the critical need to make cities and towns compact, legible, inclusive, safe, resilient and sustainable. Of particular relevance to the development of a National Policy on Architecture are the RSES RSOs that promote compact growth and urban regeneration (RSO 2), that protect and enhance healthy communities (RSO 4), that promote creative places and heritage led regeneration (RSO 5), that support sustainable rural communities and rural development (RSO 3), that build climate resilience (RSO 8), that support the transition to low carbon and clean energy (RSO 9), that build a resilient economic base (RSO 12) and that support platforms for collaboration, funding and partnership opportunities (RSO 16). The 16 RSOs set out in the RSES are fully aligned to the UN Sustainable Development Goals (SDGs), EU thematic objectives¹, and the NPF NSOs.

Observations on Consultation – Key Planning Areas

Designing for climate resilience and sustainability

The Consultation Document states that new national policy on architecture will encourage the creative high quality and human-scale consolidation and reuse of existing cities, towns, villages and reusable buildings, especially underused and brownfield sites. The prioritisation of sustainable communities with integrated amenities and services, preservation of natural resources and biodiversity are highlighted. The RSES provides a spatial framework to promote compact growth as an alternative to continued urban sprawl, which negatively impacts on both the environment and people’s health and well-being. The Spatial Strategy directs significant growth towards designated settlements with ambitious targets for at least 50% of all new homes to be built, to be within or contiguous to the existing built up area of Dublin city and suburbs, at least 30% for other urban areas (RPO 3.2), and to promote better use of under-utilised, brownfield and public lands (RPO 4.3).

In addition, the RSES sets out Guiding Principles for local authorities to deal with the complexities of brownfield and infill sites. These include, amongst others, masterplanning and the integration of good urban design and placemaking, the encouragement of pilot projects, supportive initiatives that promote reuse, refurbishment and retrofitting, and exploration of opportunities for biodiversity

¹ New priorities for EU funding 2021-2027; A Smarter Europe, A greener, low-carbon Europe, A more connected Europe, A more social Europe, a Europe closer to citizens.

enhancement. The implementation of these measures through appropriate planning responses and supported by policy responses from the National Policy on Architecture will be critical in driving and enabling future sustainable settlement growth and to support a climate resilient region.

The design, construction and operation of buildings also has a significant role to play in reducing energy demand and increasing energy efficiency. RPO 7.40 requires that local authorities include policies in statutory land use plans to promote high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retro fitting of energy efficiency measures in the existing building stock and energy efficiency in traditional buildings. All new buildings within the Region will be required to achieve the Nearly Zero-Energy Buildings (NZEB) standard in line with the Energy Performance of Buildings Directive (EPBD). Further, RPO 7.41 supports and promotes structural materials in the construction industry that have low to zero embodied energy and CO2 emissions. The use of renewable energy solutions to provide heating and hot water to houses and businesses contributes to sustainability, reducing demand for and consumption of energy. The RSES identifies and supports the use of heat mapping and district heating, bioenergy resources and the development of smart grids to accommodate more diverse power flows for communities into the future (RPO 7.37, 7.34, 7.38, 10.19).

In terms of future initiatives, it is considered that focusing on effective community engagement will be essential for building public confidence and to help Ireland achieve transition to renewable energy. An increase in community participation in renewable energy projects such as community ownership models should be supported in this regard. The Sustainable Energy Community Network has been successful in the Eastern and Midland Region with Dunleer Sustainable Energy Community providing leadership as ‘energy ambassadors’ in the community of Dunleer, County Louth and other communities across Ireland and partnering with the Centre for Renewable Energy at Dundalk IT, Louth County Council and the Alheim region in Germany to develop knowledge and best practice in this area.

Designing quality places for public benefit

Placemaking is an essential link between spatial planning and economic strategies, facilitating improvements to the public realm and people’s quality of life and playing an increasing important role in attracting talent and investment. Healthy placemaking is one of three key principles of the RSES and attractive public realm and access to diverse amenities and facilities, arts, culture and heritage are key determinants of placemaking policy to be emphasised within the National Policy on Architecture. The RSES sets out Guiding Principles for local authorities (RPO 9.10) in the creation of healthy and attractive places, with a focus on the integration of good urban design principles into layout and design of new development, prioritising active and healthy lifestyles that support strong inclusive communities and provision for diverse connected open spaces and public realm incorporating ecosystem services and climate change measures.

The RSES introduces a Health Place Checklist (Appendix C II) as expressed in the Economic Strategy to assess the quality of places that make it attractive for business, such as critical mass and urbanisation,

connectivity, talent and innovation, networks and policy co-ordination. Arts and cultural heritage are key in highlighting distinctiveness of place, with significant potential for creative industries, cultural tourism, and heritage led regeneration.

The Consultation Document highlights that public and private sectors must work together to achieve high quality and innovative solutions to the many requirements and challenges in progressing public housing, built heritage and infrastructure projects. Local authorities can support the development of ‘smart communities’ by allowing use of public assets to support increased local connectivity and by ‘digital masterplanning’ of new large-scale development areas. To leverage the Disruptive Technologies Innovation Fund under DBEI, EMRA will support and identify flagship projects that would benefit from public-private partnerships involving experiments with emerging technologies and a focus on the citizen experience. EMRA is gaining experience in this area and is currently a partner in an innovative interregional exchange project “Next2Met” which aims to increase the attractiveness of the Midlands² as a region to live, work and visit focusing on soft digitalisation measures. This project will leverage the power of digitisation to create new services and economic activities in these regions, with the knock-on effects of reduced commuting and less carbon-intensive employment.

Respecting our past, shaping our future

The Consultation Document highlights that the built heritage in our historic cities, towns and neighbourhoods is a significant resource for local communities, businesses and visitors, and by reusing, repairing, adapting and upgrading buildings in a sensitive and holistic way will support vibrant and successful places and the transition to a low carbon society. EMRA will support local authorities to work with local communities to promote historic towns in the Region in the practice of heritage led regeneration, to promote the sensitive and adaptive reuse of historic building stock and industrial structures, where appropriate, and to strengthen their capability to draw down European and national funding (RPO 9.27).

The National Policy on Architecture can provide a framework to support local authorities in the preparation of Town Centre Renewal Plans, Placemaking Strategies, Town Centre Health Checks and Design Guidelines to support viable and sustainable towns and villages and provide for revitalising vacant spaces and improvements in the appearance of streetscapes as supported by RPOs 6.12 and 6.13 of the RSES. EMRA will support the use of targeted financial incentives to re-establish the dominant role of towns centres provided for in planning policy to encourage a greater take up of town centre development opportunities (RPO 6.14).

Leadership

The Consultation Document highlights that a sense of purpose and shared vision are essential, and collective leadership is needed to imagine and share solutions to complex built and natural environment questions. The Regional Assembly has developed a wide range of stakeholders, across the region, nationally and in a European Context, and this has been further enhanced during the

² Counties Laois, Longford, Offaly, Westmeath

collaborative approach that was taken in the formulation of the RSES for the region. With this collective engagement the Assembly provides capacity building for the planning system in the region by providing a common evidence base, a methodological approach to core strategies of local authority development plans including data sets of assets of settlements across the region and fora to deal with strategic, common and cross boundary issues. EMRA are currently developing a Regional Development Monitor to analyse socio-economic trends across the three Regional Assemblies (Eastern and Midland, Southern, and Northern and Western) which will provide a common, up-to-date shared evidence base with information on assets, economic base, settlement functions and economic performance to be published as open data where appropriate, in accordance with RPO 6.36. This will enable understanding of how towns and localities have developed to date, thus enabling the identification of growth constraints, the assets and the growth opportunities that will enable evidenced based decision making.

The Assembly recognises the opportunities in the changing dynamic in Ireland and the RSES seeks to optimise and lead investment in the Region and maximise the potential of National and European funding. This will be facilitated through partnership with stakeholders and in collaboration with other agencies to deliver on the shared vision of the Strategy and to continue building a sustainable, healthy and resilient region. The establishment of the RSES Implementation Group will oversee progress on the implementation of the RSES and identify opportunities to drive regional development (RPO 12.1). This will also include the building of institutional capacity to ensure that all government agencies, local authorities and regional stakeholders have sufficient capacity to access funding sources and successfully attract competitive funding (RPO 6.35). EMRA continually participate in externally funded learning platforms and projects which develop and share best practice from the region with partners across Europe in the fields of the digital economy, spatial planning and the environment.

Knowledge and Innovation

The Consultation Document emphasises that the State requires a built environment research platform to prioritise co-ordinated research, build technical capacity, foster an expert workforce and knowledge base for architectural design. The RSES advocates excellence in higher education and a skilled labour force for the Region (RSO 13), a strong economy supported by enterprise and innovation (RSO 12) and enables a regional platform for collaboration and partnerships (RSO 16). The RSES recognises that third level institutions and higher education providers in the Region are a critical enabler of economic development, providing continuing professional development, advanced research and facilities to support business growth and clustering.

“Smart Specialisation” allows for a collaborative entrepreneurial discovery process, whereby industry, academia and local knowledge are collectively used to identify the unique strengths and opportunities that exist in a geographical area and the RSES supports cooperation through soft measures that allow for the management of growth strategically for long term benefit in terms of economic and social development and environmental quality. The EMRA supports smart growth initiatives and programmes

that develop new solutions to existing and future urban challenges, including climate risks in the Region and will support local authorities in the drawdown of climate and smart technology funds (RPOs 12.4, 6.30). This RSES advocates collaborative initiatives such as the 'All Ireland Smart Cities Forum' supported by Maynooth University, which provides a platform for networked knowledge sharing between the cities of Cork, Dublin, Limerick, Galway, Waterford, Belfast, Derry and Newry and includes the two regional initiatives of Smart Dublin and Cork Smart Gateway. EMRA will support Regional Enterprise Plans, Local Enterprise Offices and local authorities to collaborate with the Regional Skills Fora managers, Higher Education Institutes, Education and Training Boards and local stakeholders to address skills shortages and lifelong learning challenges in the Region (RPO 6.25).

Conclusion

The Regional Assembly welcomes the opportunity to further engage in the process of preparing the National Policy on Architecture and the executive looks forward to continuing engagement with the Department of Culture, Heritage and the Gaeltacht.

Regards,



Jim Conway
Director
Eastern and Midland Regional Assembly
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