



IRISH LANDSCAPE INSTITUTE
Institiúid Tírdhreacha na hÉireann

Submission on the Local Area Plans Draft Guidelines for Local Authorities and Manual for Local Area Plans
July 2012

Irish Landscape Institute



1.0. Introduction

The Irish Landscape Institute (ILI) welcomes the opportunity to respond to the invitation for submissions in response to the *Local Area Plans Draft Guidelines for Local Authorities (LAP Guidelines) and Manual for Local Area Plans (LAP Manual)*.

1.1 About the ILI

The Irish Landscape Institute (ILI) is the recognised body in Ireland under the European Federation of Landscape Architects (EFLA) and a member of the International Federation of Landscape Architects. The Institute, as the professional body representing Landscape Architects in Ireland, has a Constitution and a Code of Professional Conduct. The Institute has a membership of 160, made up of full members, graduate members, student members, and well as honorary members and Fellows. The ILI aims to:

- Set standards of excellence in the fields of landscape planning, landscape architecture and landscape management.
- Encourage and facilitate the Continued Professional Development of its members.
- Increase public awareness of landscape professionals and their work.
- Support the interaction of landscape architecture with related disciplines such as engineering, architecture and planning.
- Support the development of landscape education at all levels in Ireland, including accreditation of a degree course at NUI on behalf of EFLA.

2.0. Local Area Plan making in general

The ILI welcomes the publication of the Draft LAP Guidelines. We recognise the important role of Local Area Plans in planning and delivering high quality environments for communities. Our membership across private practice and public bodies have been active in the preparation of Local Area Plans in particular championing; public realm, green infrastructure, recreation and cultural heritage issues.

2.1 The ILI's primary concern in relation to LAP's can be summarised as follows:

2.1.1 That the existing landscape resources (views, trees, woodlands, watercourses, flood plains, etc.) are treated with respect in the LAP and are properly integrated into the plan.



- 2.1.2 That the LAP recognises the value of the landscape in the everyday lives of the people who live and work in an area, as advocated in the European Landscape Convention.
- 2.1.3 That the LAP delivers a high quality of landscape and standard of living for the people of the area that the LAP will cover, including existing and future residents, workers, businesses and visitors.

We submit that it is critical that one of the first considerations in the local area plan preparation is to have a detailed understanding of the area historically, culturally and physically (including an-depth understanding of the topography, rivers and watercourses, soil, existing vegetation etc.) and which if undertaken comprehensively, will assist in influencing and determining the primary infrastructure layout of the LAP.

2.2 The role of the Landscape Architect in the Local Area Plan process

The Planning and Development Act 2000, as amended, introduced a more plan-led system aimed at ensuring proper planning and sustainable development. While Planning Authorities must play a lead role in LAP preparation and overseeing and managing the delivery of LAP development, the value of broader and more comprehensive multi-disciplinary design teams is essential.

Landscape architecture is rooted in an understanding of how the environment works and what makes each place unique. As a professional organisation, our members are skilled in strategic planning, delivery and management of the public realm/public spaces to ensure the protection, conservation and enhancement of the natural and built development for the public benefit.

As the LAP is the level of plan-making that is closest to local communities, either in urban or rural contexts, local area plans must be based on effective public participation and consultation with interested bodies. Landscape Architects in their role as designers of public spaces often undertake public consultation with the local community and key stakeholders (through information sessions, workshops, focus groups etc.) and are strategically placed to play a significant role in this process which will result in a more inclusive plan. Further, Landscape Architects being equally involved in overseeing the construction end of their plans and are thus pragmatic and skilled in achieving successful results on the ground.

We offer below some specific comments and suggestions on how the Draft LAP Guidelines text could be modified and enhanced.



3.0. Comments

3.1 As a general comment the tone of the guidelines is somewhat reactionary to historical shortfalls of the Planning and Development system and overly focused on housing development. We submit that Local Area Plans should have at their heart a vision with regard to quality of life and quality of the physical environment and that this aspect is highlighted in a clear and simple manner in the preamble and continually emphasized within the document.

3.2 Highlight examples of poor planning and consequences thereof.

Section 1.2 of the guidelines cites the aim of highlighting best practice. It would also be beneficial if the guidelines cited examples of poor planning and the consequences thereof; such as the inappropriate development of flood plains.

3.3 LAPs in context

Section 2.1. suggests that local authorities may make LAPs in conjunction with adjacent local authorities. We would suggest that LAPs must make reference to the adjoining areas to ensure the integration of the surrounding and that LAPs are coherent

3.4 LAP Consultees

Section 2.2 outlines the need for consultation and we would request that the statutory list of consultees include non-governmental agencies including the Irish Landscape Institute.

3.5 Green Infrastructure and Biodiversity

The ILI welcomes the reference to Green Infrastructure and Biodiversity under section 5.4. We recommend that this is further strengthened and that Green Infrastructure Strategies are used as a guide and as an essential component of all Local Area Plans. We also submit that as a minimum that an ecological survey in the form of habitat mapping (Fossett, Level 3) forms a baseline for all LAPs. We would also suggest that section 2.3. list any such guidance e.g. *Green City Guidelines* (Urban Institute Ireland 2008), *Creating Green Infrastructure for Ireland* (Comhar SDC 2010), *Green Infrastructure A Quality of Life Issue* (Urban Forum 2011); as part of the list regarding relevant documents which should be consulted and referred to in relation to the preparation and implementation of LAPs.



3.6 Economic Development and Employment

Promote local economic development and employment growth by focusing on issues such as the creation of vibrant and dynamic city and town centres where local businesses thrive and the provision of low cost accommodation for start-up businesses;

While we are in favour of creating vibrant sustainable towns and villages, we would wish to ensure that 'employment growth' is not seen as an opportunity simply for the provision of speculative housing development in advance of infrastructure being provided. If we have learnt anything from the recent past, it is that the primary infrastructure (including schools, medical centre, parks, sports and play facilities, social and community facilities etc.) should be developed prior to or in tandem with housing development, as recommended under Section 6.2 – Phasing of Development.

3.7 Smarter Travel

Encourage smarter travel patterns through more compact, less sprawling, and better structured urban areas and facilitating more sustainable and healthier travel habits such as walking, cycling, and the use of public transport;

We welcome the inclusion of this key policy to create more compact, sustainable new urban areas, where walking and cycling and the use of public transport is considered and designed into the Local Area Plan at the earliest stage of the process.

3.8 Multi-disciplinary Plan making

Preparing inclusive, effective and implementable Local Area Plans require the input of a broad spectrum of professions, specialists and stakeholders. We recommend that LAP plan making teams comprise a mix of relevant disciplines engaged through each stage of the plan making process. Brief reference is made to such a multi-disciplinary approach under section 6.4: *In-house planning and project management*. We recommend that guidance on the mix of skills required for making LAPs be provided to the front of the document, perhaps under Chapter 3.0 (process for Preparing Local Area Plans). A list of possible relevant specialists should also be included.

In particular, we would suggest that Landscape Architects form part of the key phases as outlined in 3.1 and in particular the gathering of background data and the initial preparation of the LAP. However, the involvement of landscape architects throughout the process would ensure key issues are addressed at all stages of planning and implementation.

In section 6.4., the example of the multidisciplinary team of South Dublin County Council is cited as good practice. We would suggest that this be developed as part of the guidelines and that Landscape Architects (as a separate but allied discipline within



the professionals specializing in the design, construction and management of built environment) are included in the list of required disciplines.

Where the resources are not available within a planning authority to establish a sufficiently complete planning team, we recommend that knowledge and skills be provided in a cost effective manner and that the skill sets are provided by independent professionals.

3.9 Design Capacity

We acknowledge and welcome the urban design function of Local Area Plans and the promotion within the guidelines document of urban design training and CPD for local authority planners. However we respectfully submit that training and CPD may in itself be insufficient and is no substitute for professional qualifications and experience.

We recommend that the urban design and spatial aspects of plan making be undertaken or at the very least reviewed by experienced urban design practitioners to appraise the merits and deliverability of urban design codes, design frameworks and public realm proposals.

3.10 Chapter 6.0

We respectfully submit that Chapter 6.0 is the most informative and useful chapter of the guidelines as it highlights recent innovations in best practice and that some or parts of this chapter should be brought forward in the document particular; section *6.3 Provision of Social and Community Infrastructure* should fall under section 1.1 Role and Purpose of Local Area Plans and the section on *Civic Infrastructure Audit* (p. 49) be included under Chapter 3.0.

3.11 Place specific content

We recommend that the guidelines reinforce the area specific nature of LAPs and that plans avoid unnecessary repetition of the planning policies, guidance and standards as set out in Development Plans and other Planning Guidelines documents.

3.12 Planning and Development Regulations

The sections of the Planning and Development Regulations addressing Local area Plans should be included as an appendix in the LAP guidelines document.



3.13 Phasing

On page 46 1st paragraph, reference is made to brownfield locations having longer overall delivery horizons (greater than 6 years). Considering the perpetual un-predictability of economic conditions and availability of finance and the reality that the majority of developments are instigated by private developers we submit that that all phasing should be based on action, priority and sequence rather than timeframe.

3.14 Monitoring.

We recommend that Planning Authorities are realistic as to the level of monitoring achievable across all of their Local Area Plans. That monitoring should focus on core issues identified such as environmental indicators, housing availability, school capacity. Planning authorities should where possible carry out appropriate work with local stakeholders groups on monitoring tasks e.g. commercial vacancy, flora and fauna surveys etc.

The monitoring process should identify quality of life indicators for the purposes of monitoring the plan e.g. quality of public realm, access to sports and play, provision of public transport, independent litter surveys, tidy towns inspections, post occupancy evaluation.

Strategic Environment Assessment and Appropriate Assessment monitoring should be fully integrated with Local Area Plan monitoring.



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4.0 Conclusion

Our submission has focused on the guidelines rather than the Draft manual. It is stated in section 1.3. that the accompanying manual will be updated from time to time and ILI would welcome the opportunity to assist with this process.

The ILI would welcome further opportunities work with the Dept. in developing planning guidance and best practice and would make delegates available to attend at future workshops, seminars and colloquia should they arise.

On behalf of the Irish Landscape Institute

Yours sincerely,

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