

## Introduction

### **Introduction to the CIOB**

The Chartered Institute of Building is the world's largest and most influential professional body for construction management and leadership across the built environment. We have a Royal Charter to promote the science and practice of building and construction for the benefit of society, and we've been doing that since 1834. Our members work worldwide, and across the island of Ireland in the development, conservation and improvement of the built environment.

We accredit university degrees, educational courses and training in universities and colleges in Ireland. Our professional and vocational qualifications are a mark of the highest levels of competence and professionalism, providing assurance to clients and other professionals procuring built assets.

The CIOB also has a dedicated policy and research function, whose expertise we have drawn on in the preparation of this response.

### **Process for producing this consultation response**

To ensure that we captured the breadth of views from thousands of CIOB members across Ireland, we ran a month-long consultation using the discussion document provided by the Department of Culture, Heritage and the Gaeltacht (DCHG). Members' views were collected using a digital survey, to complement the internal expertise of the CIOB's policy team. The CIOB also attended the workshops hosted by DCHG during the consultation period. Ideas gathered from these workshops, along with the policy team's and our members' views have been collated under the questions from the discussion document, and together represent the CIOB's response to this consultation.

## Consultation Response

### **What is your top priority for the National Policy on Architecture - in terms of its vision, content or its actions?**

#### Governance

The issue of governance has been raised both during the workshops, and by our members. It is quite clear from the discussion document that any National Policy on Architecture (NPA) will spill over into the remit of other departments – the Department of Housing, Planning and Local Government, and the Department of Finance are the most obvious, although there are others – and, as such, if the NPA is to evolve from a discussion document into a set of clear policies, with concrete, enforced policy outcomes, other government departments need to be brought on board.

For instance, there is clear tension between what the NPA proposes in terms of sustainability, and some of the measures in Ireland 2040 around the permissibility of one-off housing, the continued prioritisation of road building and its associated housing development. Have the Department of Housing, Planning and Local Government (DHPLG) been made aware of this policy and the potential

implications it has for Ireland 2040? What is the hierarchy between Ireland 2040 and the NPA in terms of policy enforcement? These questions need to be clarified at the outset of the NPA's life.

Another example of the need for cross-departmental buy-in to the NPA comes in the area of procurement. The discussion document says the NPA will support 'publicly procured projects to prioritise design and construction quality for sustainable, well-designed, serviceable and high performing buildings and infrastructure'. How does this square with the Department of Finance's emphasis on the financial bottom line when it comes to public spending? Have they been notified of these new criteria? Are they on board with them? If not the NPA will struggle to be implemented in a meaningful way.

In sum, the discussion document asks, 'How can we motivate public and private sectors to jointly demonstrate built environment leadership?'. This is putting the cart before the horse as – given that the NPA is in its infancy policy-wise – the real question at the outset should be 'how can we motivate all of the public sector to unify and demonstrate built environment leadership?'

#### Other priorities

- Post Occupancy Evaluations. It may seem absurd to those outside the industry that it is not a matter of routine to test the performance of buildings against the aspiration of the initial design, but it rarely happens. Moreover, it is a concern that lessons from both good and bad outcomes are not being routinely fed back into the industry to promote innovation and overall improvement in performance. The NPA is an opportunity to enshrine post-occupancy evaluation in policy.
- Providing City Centre Architecture that is fit for purpose, respects and compliments adjacent structures, is not mono-form glass blocks, and has adequate facilities for its users.
- Designing for climate resilience and sustainability.
- A mandatory requirement to provide robust, resilient and efficient buildings/structures guaranteeing a 60-year minimum serviceability life to obsolescence.
- Energy efficiency and sustainability.
- A built environment that is accessible, robust, easily maintained, has a low carbon footprint, and is environmentally sustainable, combined with creative and inventive design.
- Design for life i.e. all stages of human life.
- Affordability for end users.

**The Department have set out five themes to concentrate on as the areas they think are most in need of inclusion: Theme 1: Designing for climate resilience and sustainability Theme 2: Designing for quality places for public benefit Theme 3: Respecting our pact, shaping our future Theme 4: Leadership Theme 5: Knowledge and innovation Would you pick any others?**

While the themes above cover off the content of the NPA, they overlook the implementation stage. Therefore, we suggest the additional headings of:

- Demonstrating an all of government, cross-departmental approach;
- roadmap to implementation;
- the NPA's potential impact on existing national infrastructure projects.

## Leadership

### Introduction: procurement, leadership and ethics

Public and political disquiet over the quality and safety of what is built is already evident in the aftermath of the Grenfell disaster, Priory Hall and in the lengthening list of complaints levelled at Irish, primarily Celtic Tiger era, house builders. This disquiet arises at a time when there is growing political desire to emphasise social value rather than simply lowest price in public sector procurement. This means considering not just the economic costs, but the positive and negative impacts on society and the environment. This desire for social value has been suggested as legislation under Public Services and Procurement (Social Value) Bill 2017. The NPA provides a valuable opportunity to build this wider conception of value into public policy but, as discussed below, will require an all of government buy-in, particularly from the Department of Finance (DOF).

The CIOB has carried out an extensive survey about procurement in the built environment. According to respondents, the four key priorities in public sector procurement should be:

- Standardisation
- Reduced cost of procurement
- Sustainability
- Public accountability

Finally, the drive for better outcomes in the built environment must never come at the cost of our moral compass. In Ireland, investors are increasing their scrutiny of company action and there is growing pressure on public procurement processes to embed anti-slavery due diligence. This means government contracts could soon be lost by companies failing to act. A focus on ethical procurement practices led by central government will facilitate companies taking a more holistic and less financially focused approach to procurement. Industry can learn from initiatives in other sectors where suppliers are rating the performance of buyers, giving voice to disempowered companies at the end of supply chains.

## **Q How can we motivate public and private sectors to jointly demonstrate built environment leadership?**

### Procurement

Procurement processes provide a clear opportunity for the public sector to demonstrate built environment leadership. The public sector as client needs to move beyond the rigid scoring mechanism which prioritises cost, and often fails to appreciate the detail of applications from a quality, design and sustainability perspective. If broader criteria such as sustainability, quality design, architectural and planning expertise, use of technology and innovation, were given due consideration, and bidders were competing on design, quality, and vision rather than price, this would go some way to improving built environment outcomes from procurement processes. However, this can only work if the DOF is willing to buy into such criteria and move beyond the short – typically political – term financial bottom line as the deciding factor for projects.

The procurement process also provides an opportunity for the public sector to facilitate innovation and increased efficiency in the built environment, particularly construction. Public-sector contracts can be designed to nudge companies to adopt new technologies and to co-ordinate with each other more efficiently. Too many construction jobs are still mapped out with pen and paper. Britain, France and Singapore now require bidders for public-sector contracts to use building information modelling, a type of digitised construction plan, in the hope that once they have invested in the relevant software, it will be used in private-sector projects. SMEs with fewer resources available to invest in digital innovation could be facilitated in levelling up through the creation of an innovation fund, which they could use to invest in the requisite training and development.

### Use of public land

There is also a clear opportunity in terms of public assets – particularly land holdings. Instead of selling land off to the highest bidder – as is currently national policy as directed by the Department of Finance – alternative criteria which take account of wider socio-economic national policy goals such as the delivery of affordable, carbon neutral housing could be set. For example, instead of posing the question ‘what is the maximum price we can achieve through selling our land?’ land holding public bodies could be encouraged to ask ‘how many BER rated affordable housing units can we deliver on our land?’. This will require a wider, and longer-term conception of value than DOF currently operates with, although even under current DOF criteria, delivering affordable, carbon neutral housing on public land close to existing amenities saves money in other areas, particularly health<sup>1</sup>, albeit over the longer term.

## **In what ways should the Government work with stakeholders and communities to improve how places look and function?**

### Local Authority Resourcing

There has been huge success in Local Authorities (Las) both in the UK and Ireland, that have employed urban designers and architects in their planning division. This means that there is a clear,

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<sup>1</sup> See <https://www.rtpi.org.uk/media/1302/delivering-large-scale-housing-policy-paper-2013.pdf>

expert local input into building projects, and that areas are not at the mercy of whatever the market offers.

This requires well resourced local authorities, particularly planning teams. In the UK this additional resourcing has been achieved by removing the debt cap on for all LAs to allow them to build their teams' skillsets.

#### Knowledge sharing by Local Authorities

To share these success stories and best practice in terms of delivering positive local built environment outcomes, local authorities should be facilitated in creating fora for knowledge exchange. There is so much good work that goes on in LAs that is transferable across the country, and this intelligence could be shared using regional fora hosted by DCHG on a quarterly basis. The well-run workshops hosted by DCHG as part of the NPA consultation process provide a template for this.

#### Explaining the benefits of development

Finally, the benefits of new development in a local area need to be demonstrated to the community. Too often new developments are framed in terms of their negative impact on the local environment, rather than the benefits they can bring in terms of local infrastructure and regeneration. At the beginning of the process of development, the community should be asked what they need in terms of infrastructure (surgeries, schools, public transport, for example) and the ability of new local development to deliver some of these benefits should be clarified.

## Designing for climate resilience and sustainability

### **What initiatives do we need to address the combined challenges of climate action, urban regeneration and sustainable housing?**

#### One-off housing and the National Planning Framework

Climate resilience and sustainability is a clear area where DCHG and the NPA need to have an open discussion with DHPLG in terms of a review of the National Planning Framework: Ireland 2040. The National Planning Framework's allowing of one-off housing for 'social' reasons acts antagonistically to addressing the challenges of climate action, urban regeneration, and sustainable housing. If meeting these challenges is a stated aim of the NPA, then a review of one of housing needs to be undertaken in conjunction with DHPLG. This is urgent as, at the time of writing, one of housing is the most popular type of new build house in Ireland, despite its being - by any measure - the least sustainable form of dwelling.

#### Efficient use of public land

If the NPA is to join other national policy documents such as the NPF and the National Climate strategy in calling for climate action, urban regeneration, and sustainable housing, then this needs to be reflected in how public land is used. Specifically, centrally located, public land should be used

exclusively for urban regeneration projects. Taking Dublin as an example, at the moment there are large swathes of public land in the urban core being used as bus depots and car parks. This is contrary to the three aforementioned national policy documents and needs to be reviewed immediately. The NPA could provide the occasion for such a review, by bringing land holding government departments together, and assessing how they use their assets in light of these national policy goals.

#### Other

- Mitigate risk of flooding and high tides;
- communal transport & accessibility to be provided in new developments as a matter of course;
- combined and common approach by government and professional bodies
- encourage passive houses;
- promote PV & battery storage;
- ban oil/gas in new houses (after a phase out period);
- housing grants to improve the existing housing stock to meet current building regulations requirements.

#### **What key sustainability considerations are essential when decision-makers plan the future built environment?**

##### Design

Design for earlier connection to the long-term energy source

Enforce better inspection of air conditioning systems

Initiate a comprehensive retrofit programme for residential and commercial buildings

Move to lifecycle assessments of building energy use and emissions

Strongly enforce building regulations

##### Construction

Adopt best practice energy use in corporate offices

Adopt best-practice energy management on site

Adopt fuel-efficient freight driving and renewable transport fuels

Connect to the long-term energy source earlier

Encourage subcontractors and the supply chain to reduce their own carbon footprint

Promote greener business travel

Use energy-efficient plant, efficiently

Use energy-efficient site accommodation

### Operation & maintenance

Begin a phased introduction to extend annual display energy certificates (decs) to all non-domestic buildings

Buildings should have a regularly updated operations and maintenance manual

Introduce a non-domestic “code for sustainable homes”

Introduce smart metering technology within all buildings

Provide training and skills for all building trade professionals to a recognised standard

Strengthen the requirements of the building regulations

### Retrofit & re-use

Create a knowledge hub for retrofit

Develop a comprehensive strategy for the refurbishment and retrofit of Ireland's existing building stock

Develop an education and skills programme for retro-fit<sup>2</sup>

Incentivise owners/occupiers to improve the energy efficiency of their buildings

Increase the use and effectiveness of building performance tools

Provide design guidance for refurbishment and retrofit works as part of building regulations

### Waste

Co-ordinate projects to allow surplus material from one to be used on another

Continue to produce effective site waste management plans

Design out waste at the earliest opportunity

Enable early contractor involvement in pre-construction phase

Minimise the waste that cannot be designed out

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<sup>2</sup> CIOB already has extensive training and education programmes and would be happy to partner on this

### Skills & education

All courses should involve site-based experience for the learner

Facilitate, via accreditation<sup>3</sup>, greater interaction between academia and the industry

### **What other climate and sustainability issues concern you that the architectural policy should consider?**

See above

## Designing quality places for public benefit

### **What contributes to the quality of the public spaces and streets in our cities, towns and villages?**

#### An end to spatially blind housing policy

To deliver quality public spaces, the NPA should inspire a renewed focus on the quality and location of housing rather than just the numbers of houses being built. The policy conversation on housing in Ireland has become dominated by numbers, and this does not bode well for delivering the kinds of places people want to live, work, and play. At a policy level we need to consider levers to ensure that the housing we deliver is in the right places – namely near public transport and employment hubs – otherwise we will repeat the mistakes of the recent past in terms of isolated housing development, and all its associated negative socio-economic outcomes.

The national propensity to prioritise building roads over public transport, along with the developer led housing model driven by land values, perpetuates peripheral development of housing built on cheap land around and outside existing settlements rather than in employment centres. This needs to stop if we are to deliver quality public spaces and streets in our cities, towns and villages. The NPA is an opportunity to introduce a spatial awareness to housing policy. This needs to be a top priority for NPA if it is to facilitate the production of quality public spaces.

The CIOB's position is clear on the need for quality homes, as opposed to simply focussing on quantity. Ensuring housebuilders are held to account and are delivering for the consumer remains paramount. If we can build more homes that are higher quality in the right places, we are ensuring a stable pipeline of construction activity whilst improving trust in the sector.

#### Encouraging occupation of town centres

The urban fabric of our town centres needs to be revived. Across the country, there are huge numbers of underutilised buildings with space above shops and pubs that could be re-purposed for housing. The NAP could be used to breath new life into good ideas that were poorly executed such as the 'living city initiative'. A new approach could embrace uniform of 3-5 story density in town centres that we

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<sup>3</sup> The CIOB accredits numerous degrees and courses across Ireland



see in continental Europe, thus creating vibrant towns, villages, and cities, while also delivering large volumes of housing.

### Working with Bus Connects

The Bus Connects plan is a clear area where the NAP can play a role in terms of public realm. The scheme as it stands is designed by engineers, and it shows! The NAP should put in places measures such that Bus Connects produces quality public spaces rather than just transit corridors. For instance, streets under Bus Connects need to have wider footpaths; more public seating areas, and more urban planting. The NPA is an ideal opportunity make intervene and ensure that Bus Connects delivers benefits to our public realm.

### Seed Planning

Given the preponderance of student accommodation, co-living, and hotels being built in our city centres, it would be a sensible move to embrace 'seed planning'. The essence of seed planning is minimum specification of how building form relates to function, thus leaving room for variation and innovation as needs evolve over time. If seed planning were embraced now as part of the NPA, all the hotels and student accommodation that we are building now could be used for other purposes – affordable housing, office space, cultural spaces, for example – in future should this seeming insatiable appetite for hotels and student accommodation ever dry up. This ability to repurpose our urban environment according to evolving societal need, would allow us to move away from being locked in to potential mistakes we are making now in terms of public realm.

### **How can architecture contribute to the common good - how does it affect society's wellbeing?**

- Architecture can accommodate the requirements of the adjacent spaces and embrace them, rather than building mono-functional parts of a city that are all residential, or all office. In Dublin's Docklands, and Cork's river front there is a huge amount of office space being built to the exclusion of facilities for the residents which city centres seek to attract. The NPA could arrest this by encouraging the creation of spaces rather than siloed buildings that do not speak to their surroundings.
- Architecture can ensure indoor air quality, thus preventing associated health risks with breathing poor quality, re-circulated air.
- Architecture can improve energy efficiency and encourage personal interactivity.
- Architecture can encourage accessibility with inspirational space design and creative use of light.
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### **What other issues on this theme could or should the architectural policy consider?**

- A review of the use of more types of building fabrics.
- Provide instruction and information courses to existing architects and end users.
- Health and Safety; fostering community spirit and a sense of belonging; noise reduction and insulation.

## Respecting our past, shaping our future

### **What social, economic or environmental factors hold us back from reusing our older urban and rural buildings - can you suggest solutions?**

#### Cost

The cost of restoration and conservation can be prohibitive. Some form of grant aid could be considered if reusing buildings is to be national policy.

#### Flexibility

It is important to understand that not all current building regulations can be imposed to all old buildings. This means allowing these rules to be flexible, and maintaining existing older buildings using a common-sense approach. Where appropriate, flexibility in allowing change of uses of older buildings- from retail to residential, for example - can deal with some of the concerns raised in this consultation around public realm in town centres.

#### Location

Any policy to re-use older buildings must be cognisant of location. It does not make sense to have a national policy of re-using buildings that is spatially blind as, for example, re-using an older building that is poorly located would contravene national policy in terms of sustainable transport and dense living as per Ireland 2040.

### **How can communities unlock their know-how and innate creativity to visualise and plan ways to regenerate their areas?**

#### Innovation in Public Participation

We need to revisit the framework whereby communities engage with planning and the built environment. The traditional town hall model has been shown to favour certain demographics (older, home-owning, retired people) while freezing out others (younger renters).<sup>4</sup> There is a lot to learn on this front from innovations internationally.

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<sup>4</sup> Quick, Kathryn & Bryson, John. (2016). Theories of public participation in governance.

Digital Civics<sup>5</sup> is a movement that has developed from a research cluster at Newcastle University. It uses technology to allow communities have their say in development and regeneration projects, going beyond traditional methods to reach a more representative sample of the community.

Neighbourhood planning in the UK is an initiative now being used by national government to ensure that local communities have an ongoing, structured way of feeding into development decisions that impact their locality. Neighbourhood planning is now enshrined in legislation and has seen improved outcomes in terms of the acceptance of development at the local (town, parish) level.<sup>6</sup>

In Ireland, we need to ensure that there is more public engagement at the plan making stage rather than when planning permission is applied for. The Office of the Planning Regulator is doing good work on this front, and the NPA could offer support in order to roll out a national campaign of public awareness of citizens' ability to have a say in regenerating their local areas.

**Are there other issues relating to our architectural heritage that the architectural policy should consider?**

More vernacular materials need to be incorporated within building facades.

## Knowledge and Innovation

**In what areas does architectural research need to be undertaken and who should be involved?**

Materials and evaluation

Sustainability and in-depth awareness of what is involved in producing the materials being proposed for projects should be encouraged. Questions to consider in this context include: are they sustainable products; are they made using poorly paid workers; what are the transport costs/distances from source? The Environmental Products Declaration (EPD) is useful in this context.

Live project research on new technologies before they are promoted, and grant aided by SEAI to develop an effective COP for the system.

As above, post-occupancy evaluation should be a matter of routine to test the performance of buildings against the aspiration of the initial design.

**How can third level institutions and the construction industry coordinate, share and continually build on their knowledge base about our built environment?**

Creating forums for interaction between government, industry, and HEIs

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<sup>5</sup> See <https://digitalcivics.io/>

<sup>6</sup> See <https://www.gov.uk/guidance/neighbourhood-planning--2>

Invite built environment industry bodies to third level institutions to discuss the industry's approach to the built environment. This already happens in certain institutions, such as Construction Day at GMIT, but it needs to happen more widely.

Professional Institutes such as the CIOB, RIAI, CIF, SCSi, RTPI, IPI should be brought together with DCHG and others to form a Built Environment Group, as a forum for interaction between government and all the stakeholders involved in the built environment. As it stands there are groups like the Construction Sector Group, which is useful, but does not cover the many and varied stakeholders involved in the built environment, particularly the end users. Such forums could facilitate collaborative research projects, sponsorship of researchers and interaction with academic departments.

**Are there other issues on education, training and the transmission of knowledge that you think the architectural policy should reconsider?**

An industry-relevant education system

Ensuring the construction industry has a steady supply of labour with the necessary skills continues to be one of the biggest issues for the built environment. It has long suffered from challenges posed by skills shortages and skills gaps and the cyclical boom and bust nature of construction means workloads and staffing requirements are heavily dictated by the general condition of the economy. Coupled with the threat of an ageing workforce, as well as difficulty in attracting new entrants, further heightens the challenge.

Improving quality and access to education and skills is crucial for ensuring a sufficient pipeline of educated, qualified and professional workers who are passionate about working in the built environment. Historically, construction has struggled to recruit the numbers of skilled workers to keep up with demand and the use of foreign labour and sub-contracting has enabled gaps to be filled. But these quick fixes do not make for a sustainable business model.

We want an education system that can help inspire and attract talent to the sector, but also one that is informed by employers; helping their businesses grow. One of the biggest challenges has been ensuring talent is inspired to embark on a career in the sector. Trends show that too many young people never join the industry after taking built environment related subjects or training, or just drop out altogether.

Education and skills need to have a vision for what the construction industry needs both now and, in the future, and it must work with professional bodies like ourselves to shape this.

**Is there anything else you would like to add?**

We would be happy to have a more detailed discussion of the issues raised in this response. The CIOB has a dedicated policy and research team in Ireland and would be happy to leverage our own expertise and the expertise of our members in delivering the NPA.

Thank you for the opportunity to respond to this consultation.