

Tionól Réigiúnach an
Deiscirt

Teach an Tionóil,
Sráid Uí Chonaill,
Pórt Láirge,
Éire.
X91 K256



**Tionól Réigiúnach
an Deiscirt**

**Southern Regional
Assembly**

Southern Regional
Assembly

Assembly House,
O'Connell Street,
Waterford,
Ireland.
X91 K256

Teil/Tel: +353 (0)51 860700 Facs/Fax: +353 (0)51 879887
R-phost/Email: info@southernassembly.ie Idirlíon/Web: www.southernassembly.ie

Sustainable and Compact Settlements Guidelines Consultation,
National, Regional and Urban Planning Section,
Department of Housing, Local Government and Heritage,
Custom House,
Dublin 1,
D01 W6X0.

5th October 2023

RE: Submission to *Sustainable and Compact Settlements Guidelines for Planning Authorities- Draft for Consultation August 2023*

A Chara,

The Southern Regional Assembly (SRA) welcome the publication of the *Sustainable and Compact Settlements Guidelines for Planning Authorities- Draft for Consultation August 2023* (Draft Guidelines), and the opportunity to make a submission on this important national policy and guidance document in relation to the planning and development of sustainable and compact settlements, with a focus on residential development.

This submission is made as a follow-on from our submission dated 27th April 2023, on the *Proposed Policy Approach Consultation Paper* to the Guidelines and has a similar format, in that comments are based on the policy content of the *Regional Spatial and Economic Strategy for the Southern Region* (RSES) and current implementation actions. Comments are set out below under the chapter headings of the Draft Guidelines.

The RSES was made in 2020 to support the delivery of the programme for change set out in Project Ireland 2040, the National Planning Framework and the National Development Plan 2018-2027. It includes a 12-year statutory strategic planning and economic development framework for future economic, spatial, and social development of Southern Region to become one of Europe's most "Creative and Innovative", "Liveable" and "Greenest" Regions. The Southern Region's population is targeted to grow by up to an

additional 343,500 persons by 2031 with an additional 225,000 in employment. It also includes the Metropolitan Area Strategic Plans (MASPs) for Cork, Limerick-Shannon and Waterford. It sets out a strategy for 14 *Key Towns*, and rural towns and villages, reflecting the differing urban structures across the Region, their strategic role and location. RPO 10 of the RSES aims to deliver *Compact Growth in Metropolitan Areas*, RPO 11 deals with *Key Towns* and RPO 26 *Towns and Villages*. There are also specific objectives set out for the individual Cities and Key Towns. In terms of Placemaking, Housing and Regeneration: RPOs 31-38 are of relevance. These objectives outline ambitious plans for achieving sustainable settlements and set the framework for local authority Development Plans to achieve compact growth in line with national and regional targets.

Chapter 1.0 Introduction and Context

Under Chapter 1.0 *Introduction and Context* of the Draft Guidelines, the SRA welcome the recognition given to the role of the National Planning Framework in setting out a high-level strategy for the planning and development of Ireland to 2040 and the need to achieve more regionally balanced population growth, split 50:50 between the Eastern and Midland Region; and the Southern and Northern and Western Regions. The challenge of accommodating the expected increase of around one million people, above 2016 levels by 2040 will need to be met in a sustainable way. The Draft Guidelines also acknowledge the role of the five cities, targeting 50% of projected population growth to Dublin, Cork, Limerick, Galway and Waterford, and in terms of *Compact Urban Growth*, the target for 50% of new housing growth in the five cities to be provided within their existing built-up footprint or 30% in the case of all other settlements.

The section on *Compact Growth* in the Draft Guidelines, states that priorities for compact growth include an emphasis on the renewal of existing settlements, rather than continued sprawl. RPOs 10 - *Compact Growth in Metropolitan Areas*; 11- *Key Towns*; 26 - *Towns and Villages*; and 35 - *Support for Compact Growth* of the RSES support this approach. The focus should continue to be on prioritising city, town and village centres in the first instance through regeneration and infill opportunities and tackling issues of vacancy and dereliction. RPO 34 *Regeneration, Brownfield and Infill Development* of the RSES sets out policy for Development Plan Core Strategies in this regard. This would also support government initiatives in this area such as the *Town Centre First* policy, Urban and Rural Regeneration Funds (URDF/RRRD) and the NTA's Active Travel Programme. The Draft Guidelines acknowledge the impact of dispersed settlement patterns on demand for travel, environmental degradation and quality of life. The concept of the '15 minute city' is recognised, with neighbourhoods that can meet the day-to-day needs of citizens within a short 10 to 15 minute walk of homes. As outlined in our previous submission, the SRA has carried out work in this area, following on from support for the "*10-minute*" city and town concepts in RPO 176 of the RSES. *The 10 Minute Towns: Accessibility and Framework Report Carlow, Ennis, Tralee*¹ offers a framework for and/or good practice guidance for mapping the '10 Minute Town' concept, which can be used by other towns to adapt the same concept.

The SRA also welcome the proposal to prepare a non-statutory Design Manual to accompany the finalised Guidelines, which will illustrate best practice guidance on how the policies and objectives of the Guidelines can be applied. We would welcome the

¹ <https://www.southernassembly.ie/uploads/general-files/SRA%20-%2010%20Minute%20Town%20Oct%202020.pdf>

opportunity to feed into this process and assist in developing best practice to encourage excellent design standards in the development of our Region's cities, towns and villages.

Chapter 2.0 Implementation

We welcome the recognition given in Chapter 2.0 *Implementation* to the role of the RSES, as part of the hierarchy of inter-related and complementary plans and policies from the NPF at national level, the RSES at a regional level and development plans and local plans at a city and county level in supporting a plan-led system. It also states that the development objectives of the development plan are required to be consistent, as far as practicable, with national and regional development objectives set out in the NPF and RSES. While Development Management and the assessment of planning applications is primarily a function of local authorities and An Bord Pleanála, and is important in terms of the implementation of the guidelines, the Regional Assembly plays a supporting role in ensuring implementation of development plans, promoting good development and co-ordination and integration with local authorities. Chapters 3 *People and Places* and 7 *Quality of Life* of the RSES are of particular relevance in this regard and it is important that emphasis is given in the guidelines to positive measures to ensure an overall improvement in sustainable development as well as by regulation. The Regional Assembly has considerable experience and interest in this area including developing and implementing programmes aimed at culture change as well as significant European experience. We would wish to work with the Department and other parties to assist in improving design standards for new residential developments throughout the Region and nationally.

Chapter 3.0 Settlement, Place and Density

We welcome the continuation of the tiered approach to residential development in Chapter 3.0 *Settlement, Place and Density*, following on from the *Sustainable Residential Development Guidelines 2009*, with highest residential densities at the most central and accessible urban locations and more compact and sustainable forms of development overall. The Draft Guidelines recognise the role of the five cities of Dublin, Cork, Limerick, Galway and Waterford and the city metropolitan areas identified in the Metropolitan Area Strategic Plans including the city and suburbs and surrounding network of towns, villages and rural areas, with ambitious growth targets set out in the NPF to 2040. As mentioned previously, RPO 10 *Compact Growth in Metropolitan Areas* of the RSES is of relevance in this regard and aims to prioritise housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling.

In terms of the expanded number of density bands under the Draft Guidelines, the approach of targeting higher densities for Cork, and including it in the same category as Dublin is welcomed given its overall size and scale. As outlined in the *Cork Metropolitan Area Strategic Plan* (as part of the RSES), Cork City and suburban area has a planned growth rate of between 50-60% to 2040 and up to 50% for the rest of the metropolitan area, which uniquely positions the Cork Metropolitan Areas as a principle complimentary location to Dublin with a strong international role, a primary driver of economic and population growth in the Region, a compact City and Metropolitan Area with increased regional connectivity and a City and Metropolitan Area focusing growth on the delivery

of sustainable transport patterns. *Cork MASP Policy Objective 1 Cork Metropolitan Area* sets out policy for the Metropolitan Area, while *Objective 2 Cork City* aims to strengthen the consolidation and regeneration of Cork City Centre, the regeneration of the Cork City Docklands and Tivoli as high quality, mixed use sustainable waterfront urban quarters and seeks the regeneration and consolidation in the city suburbs with high quality architectural and urban design responses.

The Draft Guidelines also include a set of density ranges for Limerick, Galway and Waterford cities. The status given to the regional cities in this regard is also welcomed. As outlined in the *Limerick-Shannon Metropolitan Area Strategic Plan* (Limerick-Shannon MASP), Limerick City is planned to grow by at least 50% to 2040 and to achieve its potential to become a city of scale. Limerick Shannon MASP Policy Objective 1 states that it is an objective to strengthen the role of the Limerick-Shannon Metropolitan Area as an international location of scale, a complement to Dublin and a primary driver of economic and population growth in the Southern Region. It promotes the City Centre is the primary location at the heart of the Metropolitan Area, compact growth and regeneration of the city centre and suburbs and compact growth and regeneration of Shannon. Furthermore the Limerick-Shannon MASP Policy Objective 2 supports the regeneration and continued investment into Limerick City through initiatives such as Limerick 2030 and Limerick Regeneration, to seek investment to achieve brownfield regeneration of City Centre sites, while Policy Objective 3 aims to improve and enhance Shannon as an attractive residential location through placemaking and regeneration initiatives. As outlined in the *Waterford Metropolitan Area Strategic Plan*, Waterford MASP Policy Objective 1 aims to strengthen the role of the Waterford Metropolitan Area as an international location of scale, a complement to Dublin and to promote the city centre as the primary location at the heart of the metropolitan area, compact growth and regeneration of the Metropolitan Area across the city centre and suburbs and active land management initiatives to deliver housing and employment locations in a sustainable, infrastructure led manner.

The Draft Guidelines also include a range of densities for Metropolitan Towns. As outlined in our previous submission, consideration could be given to increasing minimum density standards for Metropolitan Towns (e.g. Carrigaline, Cobh and Midleton in the Cork MASP area and Shannon in the Limerick-Shannon MASP area) from 40 to 50 dph in town centres, to reflect their size and scale and accessibility to public transport infrastructure. RPO 165 *Higher Densities* of the RSES for example, outlines how local authorities through Development Plans should ensure the consolidation of development at higher densities within existing urban centres and provision of permeability with a focus on locations where it can be demonstrated that such development supports the use of walking, cycling and public transport. In addition, RPO 164 *Metropolitan Area Transport Strategies*, the *Cork Metropolitan Area Transport Strategy 2040 (CMATS)*, *CMATS Land Use Priorities*, states that in order to ensure the success of the Strategy, higher density developments must be targeted in areas where opportunities exist for sustainable transport provision and in a manner that better aligns the provision of transport with demand.

We welcome the inclusion of *Key Towns* designated under the RSES within the category *Regional Growth Centres, Key Towns and Large Towns (10,000+ population)* in the Draft Guidelines, following on from our previous submission, in which we highlighted the fact

that Key Towns are targeted for significant growth and were identified based on a range of criteria on the sub regional significance rather than solely on population.

We also welcome the approach of *Refining Density* as set out under Section 3.3 of the Draft Guidelines. This considers issues such as proximity and accessibility to services as well as the need for more refined density by looking at the surrounding built environment and historic settings and recognising the differing nature and characters of particular settlements or their component parts. This also considers the proximity of high-capacity public transport nodes or interchanges and proximity to town centres. RPO 2 *Planning for Diverse Areas* of the RSES recognises the strategic role played by all areas, both urban and rural in achieving national and regional targets and objectives.

Chapter 4.0 *Quality Design and Quality Placemaking*

The SRA support the guidance, policy and objectives set out in Chapter 4 in relation to *Quality Design and Quality Placemaking*. As mentioned previously, the SRA welcome the forthcoming Design Manual to accompany the final Guidelines and further engagement in this area. In meeting the challenges of accommodating increased population and densities, the importance of quality, design and good placemaking cannot be overemphasised.

The *Key Indicators* set out in Section 4.4 will play an essential role in ensuring the effective implementation of the more detailed standards referenced later in Chapter 5. *Policy and Objective 4.1* of the Guidelines, for example aims to implement the principles, approaches and standards set out in the *Design Manual for Urban Roads and Streets, 2013* (DMURS) as part of an integrated approach to quality design and placemaking and is welcomed, as is the proposed move away from segregated land use areas in favour of mixed-use neighbourhoods outlined under (iii) *Mix and Distribution of Uses*. We particularly welcome recognition of the importance of high-quality Blue and Green Infrastructure including parks and greenways as an essential element of good placemaking. In order to ensure quality of life for residents of higher density developments, it is important that a high standard of useable, passive and active open space of sufficient size is located within proximity of homes. The reference to the development of regional, settlement, district and local level parks being informed by the objectives of the RSESs and any regional GBI strategy is welcomed. RPOs 124 *Green Infrastructure* and 125 *Green Infrastructure Corridors* of the RSES, highlight the need to integrate this into the preparation of statutory plans and are a key aspect of the success of higher density developments. As set out in our previous submission, the SRA worked in partnership with Local Authorities to strengthen the policy framework in Development Plans in support of Blue and Green Infrastructure, developing a framework, which includes international good practice examples on practical action to implement these policies to create green and more climate resilient settlements entitled: *A Framework for developing Blue Green Infrastructure (BGI) & Nature Based Solutions (NBS) in the Southern Region*.²

² <http://www.southernassembly.ie/eu-projects/blue-green-city>

The revised Development Standards set out in Chapter 5 will also play a key role in ensuring that targeted densities can be delivered in a manner which supports good quality design and placemaking. Underpinning considerations of density is the need for quality of design and place, and we welcome the acknowledgement of the need to move away from the continued application of suburban housing standards and the application of more innovative designs.

In terms of open space provision, high quality public open space is a core component of successful place-making and creating liveable communities. Higher residential densities, by their nature, result in a greater need and demand for public open space, including the use of existing parks and public open spaces nearby. This is particularly the case for developments with a higher density of over 100 dph, which predominantly consist of apartment typologies, and typically provide significantly less private/communal open space per unit when compared to lower density developments with more private gardens. The *Class 2 Open Spaces* (public open spaces in residential schemes) addressed through *SPPR 3 Public Open Space* therefore play a particularly important role in providing green spaces in close proximity to new housing and in supporting community cohesion and integration. The proposed number of people living in an area, is often a more accurate indication of need rather than indicating a standard percentage of the site area for public open space provision. The need for local authorities to carry out Blue and Green Infrastructure Strategies as outlined above, is also crucial in ensuring future needs are catered for.

We also welcome the proposed move towards more sustainable means of transport such as walking, cycling, public transport and the use of mobility hubs, increased bicycle parking and car clubs as an alternative to car parking. The importance of continued investment in sustainable travel interventions to support higher residential densities and the reduced quantum of car parking which are set out through revised standards is welcomed. This will not just be critical in supporting lower levels of car ownership and use within new developments, but also for existing residential neighbourhoods. Requirements for lower quantum of car parking will also need to be supported by wider initiatives targeted at cultural/behavioural change.

With respect to the assessment of impacts such as overshadowing and overlooking for newer housing typologies, consideration could be given to the potential of new innovations in planning technology to support planning authorities in the more effective analysis of the likely impacts of proposed developments. This can enable more pro-active public engagement in the planning system, meaning proposals are more accessible and easily understood by the public.

In terms of the *Glossary of Terms* set out in Appendix A, clarification may be required in terms of the reference to “built up area of settlements” under the definition for *Infill* development. It states that this may consist of *Brownfield* or *Greenfield Sites*. It is noted that under *Census 2022*, the CSO has created a new urban geography called *Built Up Areas (BUAs)*, to produce census data for urban areas. In order to remove the risk of statistical disclosure, the BUAs comprise in their entirety of whole Statistical Small Areas, resulting in significant amounts of undeveloped, greenfield land being included within *Built Up Areas* in some instances. It is still unclear if the Census BUAs will replace *Census 2016 Settlements* in terms of defining areas for the achievement of compact and sustainable growth targets set out under the NPF (National Policy Objectives 3a-3c and footnotes 17-19). The Guidelines could provide clarity in this area, denoting that *Infill* refers predominantly to brownfield land. Developing these areas is the preferred scenario in promoting sustainable and compact settlements and renewal of town centres and accessible locations in line with the 15-minute city/10 minute town concept.

The SRA also welcomes the clarification and detail set out in *Appendix B: Measuring Residential Density* on defining gross and net densities, including a practical approach to how density should be measured, calculated and applied.

We also welcome the inclusion of Appendix D *Design Checklist* and Appendix E: *Sample Housing Images, Plans and Layouts* and would welcome further collaboration and input into this area as the Design Manual for the finalised Guidelines progresses.

Conclusion

The SRA welcome this consultation opportunity with the Department of Housing, Local Government and Heritage, to make this submission on the Draft Guidelines. Achieving our Compact Growth targets and moving to a more sustainable model of development will ensure a better quality of life for citizens as set out in the NPF and RSES as well as honouring our Climate Action commitments. The SRA is committed to playing its part in supporting the change required and would welcome further engagement as part of the finalisation of the Guidelines including the preparation of the Design Manual to accompany the final Guidelines and its implementation, including looking at best practice, in a European context. In the meantime, if you have queries regarding this submission, please contact Brigh Ryan – Regional Policy Officer at: bryan@southernassembly.ie

Mise le meas,



David Kelly

Director, Southern Regional Assembly