

Minister Eoghan Murphy T.D.  
Department of Housing, Planning and Local Government  
Custom House  
Dublin 1

24<sup>th</sup> September 2018

**Re: Public Consultation on the draft ‘Urban Development and Building Heights Guidelines for Planning Authorities’**

Dear Minister Murphy,

Chambers Ireland is pleased to have the opportunity to input into this consultation on the draft urban development and building heights guidelines. Chambers Ireland is the largest business network in Ireland, with 44 affiliated chambers in our network, located in every major town and city in Ireland and representing businesses across all sectors and of all sizes.

Following consultation with our member chambers on the draft guidelines published by your Department, Chambers Ireland supports the delivery of the guidelines presented as progressive policies that should enable the delivery of the strategic goals outlined in the National Planning Framework and contribute to increased supply of housing and commercial spaces in the right locations.

Earlier this year, Chambers Ireland welcomed the publication of the National Planning Framework and the corresponding National Development Plan under Project Ireland 2040. We outlined support for the emphasis the NPF placed on re-developing brownfield and in-fill developments as a means to enhance our city environments, reduce urban sprawl and increase much needed housing supply in Ireland’s largest cities.

The draft urban development and building heights guidelines seek to make these goals, as outlined in the NPF achievable, and as such Chambers Ireland views them as necessary and positive changes to our planning system. The publication of these guidelines should offer greater certainty for developers and planning authorities following the announcement earlier this year that changes were coming on urban heights regulations.

It is unsustainable for us to continue the pattern of residential developments being built mainly outside of our cities, in the suburbs and further afield. We know that both businesses and individuals are expressing the strong desire to be located in urban centres and this requires an increased level of infill and brownfield developments.

We also know that the urban sprawl which has been a feature of past and recent developments is unsustainable both in terms of the environmental impact and the quality of life this affords residents.

The guidelines rightly acknowledge that “in some cases, statutory development plans have tended to set out overly restrictive maximum height limits in certain locations and crucially without the proper consideration of the wider planning potential”. We therefore welcome the introduction in the guidelines of Specific Planning Policy Requirement (SPPR) 3, which offers planning authorities sufficient flexibility to depart from existing local plans in order to meet requirements in density and meet the strategic goals laid out in the NPF.

SPPR 1, requiring that planning authorities identify areas where increased building heights should be actively pursued for redevelopment and infill developments will be vital in ensuring that the right type of developments are built in the right locations. Consideration for transport infrastructure and existing infrastructure connectivity of a location should result in developments of increased density being built within our urban centres.

We support the stipulation in SPPR 1 that planning authorities do not “provide for blanket numerical limitations on building height”. It is vital that arbitrary caps on building heights are removed in favour of considering national policy objectives and the potential for growth in our cities as laid out in the NPF.

We welcome your department’s commitment to ensure mixed use developments are delivered in our urban centres and their surrounding areas. This will be a vital element in ensuring cities and towns are desirable locations in which to live and work, and due consideration must be given to housing, commercial and amenity facilities rather than the single use developments that have been delivered in the past. We support the goal of facilitating the “development of an attractive street-based traditional town environment with a good sense of enclosure, legible streets, squares and parks and a strong sense of urban neighbourhood, passive surveillance and community”. SPPR 2, which outlines that “planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy”, is therefore a welcome planning policy requirement and one which should ensure that both the economic and social requirements of a city are met in future plans.

Additionally, Chambers Ireland support the introduction of SPPR 4 in requiring that a greater mix of building heights and typology be included in planning for the future development of suburban locations, as a means to increase density in greenfield developments going forward.

Unfortunately, plans for increased urban height developments are often met with public and political scepticism or fears that such developments will destroy the character of existing local areas and urban communities. As such, we propose that

the new planning guidelines should also give increased consideration to quality of design and respect for public place. To meet this objective, we propose that additional resources are provided for local authorities in urban areas to employ city architects to oversee urban planning applications, and that local authorities are encouraged to engage in more open design competitions for projects of scale.

There is also a need for increased transparency and clarity in the planning process for Strategic Development Zones (SDZs), particularly in the review stage. Any substantive change, as determined by An Bord Pleanála, requires an SDZ to go through a full statutory review and then to final approval by the local authority, the process is often lengthy and lacking in adequate transparency. A specific proposal from the Department of Housing, Planning and Local Government to target transparency, expediency, and approval of high-density projects for SDZs would be welcomed by Chambers Ireland.

We are pleased with the strategic approach taken in these guidelines by linking urban planning to the NPF goals and introducing a more “performance criteria driven approach” for local authorities to apply in local area development planning.

While the principles of the guidelines are a positive and welcome change for urban planning in Ireland, there remains the need to determine how they are to be implemented and when they are to come into effect.

Yours sincerely,

Elisha Collier O’Brien

Policy Manager for Domestic Affairs  
Chambers Ireland