

SUBMISSION BY IRISH PLANNING INSTITUTE ON:

REVIEW OF 1999 RESIDENTIAL DENSITY GUIDELINES

Introduction:

The Irish Planning Institute welcomes the opportunity to have an input into the form and content of the proposed revised Residential Density Guidelines prior to the publication of a draft document, and looks forward to making further inputs when the draft is published. This process of consultation at “pre-draft” stage is to be welcomed as part of a more open policy formulation approach now adopted by the Department.

This submission is divided into two sections; one addressing the specific questions raised in Annex A of the issue paper, the second is more general with comments on elements raised by the text of the issue paper circulated as well as other issues that we wish to include.

The Institute is still of the opinion that higher density housing is a positive and necessary approach to housing layouts particularly as population increases continue and in the interests of sustainability. However the standards of design need to be raised in line with increasing density. Where older design policies continue to be used for higher density layouts the result will create poor quality living environments for the new residents. Institute supports the view that good design should be encouraged and poorly designed development proposals should be discouraged and rejected.

On a broader perspective the Institute considers that the confinement of the document to “Density Guidelines” is now somewhat dated and reflective of the time when the original guideline was issued. The new document should embrace all elements of housing development –housing and estate design, housing density, facilities, traffic management and road design, - giving a strong co-ordinated and comprehensive set of Guidelines within one document on how new housing developments can become good places to live as well as being provided at sustainable density levels.

Section A- Specific Questions Raised.

The numbering below corresponds to the numbering of questions in Annex A of the Issue Paper circulated.

Q.1 Does the concept of residential density need to be set in the wider context of sustainable communities?

It is important that increased density should not be seen as an end in itself, but should be one element in the creation of sustainable communities. Good urban design, appropriate mixes of

housing sizes and types, including provision for families, safe road layout, and the provision of support services and facilities are also significant factors that have to be taken into account. While increased densities are desirable in most circumstances (as compared to the unsustainable densities that prevailed in our cities up to the late 1990's, and still persist in many provincial towns to date), the Guidelines should not focus solely on density. Planning Authorities should be advised of the need to ensure that new development does not consist solely of housing, but includes all of the other facilities that are required to ensure a sustainable community, both environmentally (including energy conservation), and socially (in terms of social and community facilities). The delivery of such facilities should not be left to the public sector, but should be required to be provided, or funded, by the residential developer, as part of the planning consent process. It is no longer acceptable, in the context of sustainable development, that large areas of single use housing is permitted, while the associated (and necessary) facilities for that housing are left to be provided at a later stage, at public expense.

It is critical that where large areas of land (either greenfield or a combination of redevelopment sites) are proposed for new housing that the "sum of the parts" forms part of a co-ordinated approach to delivering higher densities within particular areas. Facilities that are needed to support new/increased populations both socially (leisure facilities, public houses, shops, community spaces) and practical (clinics, schools) should be identified in the Guidelines, and the issue of mixed developments encouraged in larger schemes such as live/work units, offices etc. to create real places rather than banks of dormitory development. Higher density is not an end in itself but a tool to support the delivery of higher quality sustainable communities - the revised Guidelines need to set the directions on density within this context.

Q.2 Should the revised guidelines address issues arising from mixed use residential and commercial developments? If so, what issues?

Encouraging higher density housing creates the opportunity to provide services to new communities at a more accessible distance due to increased numbers residing within 5-10 minutes' walk of a service. The opportunities to provide local services should be encouraged within the overall umbrella of delivering higher quality and more urban density schemes from a sustainability perspective. For this reason the Guidelines should address this issue, alongside, as outlined above, the importance of providing living communities rather than just denser "housing estates".

While mixed use developments can be encouraged, this must not be at the expense of a high quality residential environment for the occupants of the residential part of the development. The issues that require to be addressed by the Guidelines, to ensure such a high quality environment, would include noise and disturbance impacts on residential amenity, arising from the proximity of "bad neighbour" uses, such as public houses, take aways or other leisure/entertainment to residential uses, and the issue of large areas of surface car parking located outside residential complexes. There can also be dis-amenities to living directly above a shop, and it may be suitable to require an intermediate level of offices between loud/malodorous uses and residential units.

A key concern, where there are mixed use residential and commercial developments, is the lack of usable and supervised communal/public open space. The provision only of balconies in apartments above commercial developments does not encourage family use of such apartments, leading to social problems and an unsustainable long-term population profile. In such circumstances, the provision of shared open courtyards above the footplate of commercial

developments (as for example the Jervis Street / Parnell Street mixed use development by Dublin City Council) could be a useful example.

Q.3 Are the definitions of gross and net densities clear and helpful ? (2.2)

The Institute considers that definitions used in Section 2.2 of the Guidelines are fairly clear. However the net density definition, in specifically excluding non-residential development is continuing the weakness within the document which perceives that mono-use development of housing is the normal form. Expansion on densities and options for mixed use schemes and supporting good examples would be helpful.

Q.4 Is dwellings per hectare still the most appropriate measure for estimating the gross or net yield of housing? (2.3.3)

The Institute feels that the use of the ‘dwellings per hectare’ measure is appropriate for estimating the gross yield of housing, and for forward planning purposes in Development Plan, Local Area Plans and masterplans etc. It seems to be serving its purpose well at such scales by giving a clear and an understandable indication of what is appropriate to both developer, public and elected representatives. The Institute feels that a level of certainty, as to what will be permissible in such plans, is reasonable and facilitates a shared agreement as to the appropriateness of a development (and hence avoids conflict, delays in processing applications, appeals etc).

However, in development management, where the net yield of housing is an important issue, and where proposals have to be assessed against statutory plan policies and the Guidelines, the measure has not been universally appropriate. In practice, the use of the ‘dwellings per hectare’ measure has been replaced in many cases by a ‘bedspaces per hectare’ or a ‘floor area’ measure, and it is considered that the Guidelines should give the freedom to Planning Authorities to choose any of these measures when setting development control standards in statutory plans, and when assessing planning applications. This is necessary, in the Institute’s view, so as to provide opportunities for Planning Authorities to set more locally appropriate densities when the inner suburban/outer suburban categories are applied to new areas of development. This is particularly the case for medium sized and smaller towns outside of the GDA or other cities where the approach to expanding the town needs to be more locally appropriate, and less similar to that for the inner or outer suburbs of Dublin.

Q5 Should there continue to be no upper limit on the number of dwellings that may be provided within any town or city centre site, subject to specified safeguards? (3.1)

It is submitted that Chapter 3 should be modified, to distinguish between the major cities / Gateways in the NSS, and other towns of a smaller size / less significant character. The chapter (entitled “Appropriate Locations for Increased Densities”) is written as if all settlements within the State exhibit the same characteristics, and that the same solutions / guidelines should apply to them all. The format of the chapter, with the sole exception of section 3.6, appears to be based on a transition from inner city, through inner suburban to outer suburban that mirrors only the pattern of development and settlement typology of major cities. Even the larger provincial towns, which are chosen as hubs or county towns in the NSS, do not exhibit this pattern. Many, for example, would not have any differentiation between inner town/town centre and inner suburban areas, nor a defined transition between inner suburban and outer suburban, as the cities do.

It is therefore suggested that the start of the Chapter should state that different standards should apply as between the major cities (Gateways) and the larger towns. Section 3.1 should be re-

named “City Centres”, and within city centres the existing advice in the section should continue to apply, with no upper limit on the number of dwellings that may be provided, subject to the safeguards mentioned.

For areas served by a range of high quality public transport there is an opportunity for site developers to employ innovative design approaches to both providing high density and high quality housing forms. The insertion of an upper cap for inner city are density would not achieve any useful purpose, but would probably curtail the opportunities of developing new ways of delivering sustainable developments, with high densities in inner city locations. However, it would be appropriate, in stating there is no upper limit, those densities that go above what is regarded as “normal” high density levels for inner cities are only really appropriate at major transport interchanges or core inner city developments in the four main cities. There is emerging concern that the lack of an upper limit is currently, in practice, being interpreted by developers that significant high densities are therefore a viable option in regional towns, despite the fact that such developments would not be in keeping with the existing traditional Irish town fabric. Therefore the guidance in this regard should be limited to the centres of the major cities, and not to town centres.

The city centre section should incorporate section 3.2 also, relating to brownfield sites. The Guidelines should state that brownfield sites in city centres also should not have any upper limit on the number of dwellings that may be provided. It is evident that, as set out in the current Guidelines, section 3.2 is intended to refer to brownfield sites in inner city areas, since the following sections are inner suburban/infill and outer suburban/greenfield. However, because brownfield sites are included in a separate section, in practice, it has been found that applicants often seek to develop such sites, even when located in an inner suburban or an outer suburban (or even an out of town) area, and argue that there should be no limit on density. This leads to confusion and controversy, and has resulted in many appeals, where the Guidelines are quoted in support of both sides.

If it is felt that there should be specific guidance for brownfield sites in inner suburban and outer suburban locations, then additional paragraphs, under those sections and without separate headings, could be inserted, and these paragraphs should state that, while higher densities are encouraged on such sites, those densities should generally be the same as is permissible within the types of locations. This is to avoid what are essentially inner city type densities being proposed on sites in inner and outer suburban areas, resulting in a development form that can be entirely out of scale and character with its surroundings.

It is suggested that, after sections 3.3 and 3.4, there should be a further section, relating to “town centres”. In the case of town centres (as opposed to city centres), there should be an upper limit, of c. 90 dwellings per hectare, but the section should indicate that this level of density would only be appropriate where the development would conform to the general character of the area, including the maintenance of streetscape and urban form. There might be specific encouragement for the redevelopment of backland areas behind the Main Streets in such towns, including advocating the use by local authorities of their compulsory purchase powers in order to assemble such sites from multiple ownerships, and regularise title difficulties, and thereby encourage sustainable development.

It is also considered that the existing provision, in section 3.3.1, whereby sites in excess of 0.5 hectares “should be capable of proposing their own density and character” should be revised and clarified, so it is specifically referring to situation where a site is located in an area of low density housing but is located within, for example, an inner suburban area, in such situations the

site design should use the density standard for inner suburban, rather than being confined by the lower density of the existing surrounding housing. It has been found, in practice, that this advice has been taken out of context, in order to support no upper limit to density, even where the site in question is located other areas than the inner city. In the Institute's view, it is only in inner city areas that there should be no upper limit to density, and it is important that, in other areas, such as inner suburban, outer suburban and towns, that specific limits are applied. The Institute is also of the opinion that the 0.5ha threshold should also be reviewed.

Q.6 Does the phrase "proximate to existing or future public transport corridors" need to be clarified/quantified? (3.2 and 3.3)

The Institute considers that this phrase needs to be clarified and giving examples would be useful in allowing the public and others gain better understanding of what is meant by it. In practice to date, the concept has been very liberally interpreted by developers seeking to justify their developments, without any analysis of whether the public transport in the corridor in fact can support the level of development proposed. Frequently, developers seek to argue the existence of what may be very limited public transport provision to justify large/high density developments. This is particularly prevalent in villages and small/medium size towns, where the public transport service is poor, resulting in unsustainable developments that are, in reality, dependent on the private motor car.

It is suggested that the Guidelines should require that, where sites are proximate to existing public transport corridors, and higher density developments are proposed than would be permissible outside such corridors, the applicant should include as part of the traffic impact assessment a public transport capacity assessment report, demonstrating that there is sufficient existing capacity to cater for/justify the development proposed. The principles set out in the DTO document "Managing Travel Demand through the Planning System" (2005) might be outlined/referred to in this context. In the case of a site that is proximate to future public transport corridors, higher densities should only be permitted where there is a definitive and confirmed commitment to provide the public transport network/service, such as a Section 49 Scheme. In cases where there is only a policy aspiration, without any certainty of funding and approval, then the development should be considered to be premature.

In terms of quantification of the phrase, it is considered that the term "proximate" should be defined as up to 1000 metres in the case of heavy rail services, and 500 metres in the case of light rail/QBC services. Particularly in relation to bus routes, there needs to be a separation of a normal bus route (which may or may not lead out onto a QBC) from a QBC corridor where there is high frequency and direct bus routes passing within a short walking distance of the site, and where the buses which reach their destination within a reasonable time. (It is considered that, at distances greater than these, it is more likely that residents will choose not to walk, but rather will use their cars and not public transport, thereby defeating the purpose of the provision, and leading to additional traffic levels, unsustainable travel patterns etc.)

Q.7 Is further guidance (e.g. height policy) needed in relation to inner suburban/infill sites, which are often surrounded by existing dwellings? (3.3.1)

It is considered that the existing Guidelines are excessively vague on this issue, and that more detailed guidance regarding the impact of overshadowing and the impact of massing in design is needed in this area. Again examples of best practice or direction on up to date good sources would be helpful.

In cases where there are proposed developments surrounded by existing dwellings of one and two stories, it is suggested that the principles (and perhaps the examples given – e.g. Fig 2, p. 90) from the original study “Planning Issues Relating to Residential Density in Urban and Suburban Locations) March 1999, which led to the Guidelines, might be considered. These suggest that there might be a buffer zone of lower rise development behind/beside the existing dwellings, with higher rise new development away from such boundaries (see p. 97 of the study).

In all cases, the key parameter should be the provision of high quality residential environments, which ensure proper standards of liveability and residential amenity for both existing residents and the proposed new residents, rather than a doctrinaire approach that sees higher densities and high rise development as an end in itself.

It would be difficult to set, in national Guidelines, specific height policies that would apply in all circumstances. However, the current ad-hoc system, where there is no defined height policy, has to be altered. The Institute therefore suggests that the Guidelines should require that, where tall buildings are to be permitted, this can only be done following the adoption, in statutory Development Plans or Local Area Plans, of height policies by Planning Authorities, which identify the appropriate locations for tall buildings. (A good example of this process is in the Dublin Docklands Master Plan, and the Planning Schemes adopted under it). It is evident that, in some areas at present, there is no clear policy on building height, and the justification for tall buildings proposed in individual cases by developers’ agents - that the particular site is a “landmark location”, lacks credibility, as there can only be a limited number of “landmark” locations in any area, where tall buildings should be allowed. Such locations should be identified and approved by public representatives as part of the forward planning process, and not be left to individual planning applications.

Q8 Have the densities suggested for outer suburban / greenfield sites been appropriate? (3.4). Is there a case for proposing minimum densities e.g. close to public transport routes?

The general guidelines for density for outer suburban/greenfield sites, of 35 – 50 dwellings per hectare, are considered appropriate and should remain.

It is suggested that, in outer suburban areas of cities (but not town or other areas), a minimum density should be specified, at 25 dwellings per hectare, “except where the relevant Development Plan or Local Area Plan specifies a higher or lower minimum density”. It is felt that flexibility should be given to Planning Authorities to set appropriate minimum densities, based on their knowledge of their areas, local market conditions and the character of particular areas.

The Institute considers that to set overall minimum densities nationally, close to public transport routes, would not be advisable, since local conditions, and the capacity of the public transport provision, can vary widely between different suburban areas. In addition, there are other circumstances that could affect this issue- for example natural or built heritage issues, airport approach zone constraints etc. This approach would only really be appropriate in where sites are located proximate to rail stations and other high quality transport links within either the GDA or other major cities. Discouraging low density standard housing in such locations would be welcome in terms of sustainability and best use of land, obviously with the qualifier of quality in design. Again, the issue is best left to Planning Authorities who can identify specific locations to which this would apply. Examples of this were the Adamstown SDZ (South Dublin) and the North Fringe (Dublin City/Fingal), where higher densities are permitted around new heavy rail stations, in adopted plans.

Apart from these types of specific cases, identified in plans, a general form of guidance should be given. However, it is suggested that the current guidance, whereby it indicates that densities in excess of 50 dwellings should be permitted “on lands proximate to existing or proposed public transport corridors” should be re-worded as follows:-

“On lands proximate to existing public transport corridors (proximate means within a walking distance of 500 metres to a QBC/light rail route and 1000 metres to a heavy rail service (ARROW or DART)), densities of between 50 and 90 dwellings per hectare should be permitted, subject to the qualitative safeguards set out in Chapter 5 of these Guidelines. On lands proximate to future public transport corridors, such densities may be permitted where the future public transport provision is likely to be provided within three/four years of the date of the planning permission. In cases where no certainty exists in relation to the provision of the public transport services in question, such developments should be considered premature and not permitted.”

(The upper limit of 90 dwellings per hectare is considered appropriate, in order that unsuitable inner city type densities might not be proposed in outer suburban locations. This density level is the maximum permitted by An Bord Pleanála in the centre of the Adamstown SDZ area, immediately adjoining the new town centre area of Adamstown, and the heavy rail service at the proposed new station for this area. It is considered that levels in excess of this cannot be justified.)

In outer suburban areas/greenfield sites in towns (as opposed to cities), it is considered that there should be a statement that densities below 15 dwellings per hectare should be discouraged, “except in areas where a lower density is specified by the Planning Authority in a Development Plan or Local Area Plan”. It is considered that there is a case to be made for lower densities in limited areas of smaller towns, in order to cater for the demand on the part of town dwellers for larger houses, which would otherwise tend to be sought in rural areas.

Q.9 Does the advice given in relation to small towns and villages need to be expanded? (3.6)

The issue of smaller towns and village needs to be examined in a much more comprehensive manner, and form an intrinsic part of the whole document. One of the emerging problems for such towns is the addition of new estates, very much in a city/large town style, onto smaller towns, which erodes the attractive qualities of the towns and swamps their resources, both physical and social. Approaches on how to tackle this pressure needs to be given, with supporting examples of best practice.

It is considered that the Guidelines should distinguish between small towns and villages. Small towns generally with a population range of 400-2,500 persons often have public sewerage systems, educational infrastructure and a reasonable range of facilities and are capable of accommodating a modest amount of new development. Such development can copperfasten facilities, such as schools, that may be declining. However, new development on an excessive scale, in proportion to the population of the existing settlement, will undo such advantages and require the provision of new facilities, as well as being socially undesirable.

In the case of villages under 400 population, generally development of new housing estates cannot be successfully accommodated or integrated. The Guidelines should advise, in such circumstances, that infill residential development, at compatible densities to the existing village cores may be permitted. In addition, it is desirable that lower density development be allowed, in order to provide a more viable (and more sustainable) alternative to one-off housing in the

surrounding countryside. Such housing might be in the form of residential clusters, or of serviced sites.

A key issue, which is arising in practice, is that some Planning Authorities are permitting residential developments, particularly at the edges of towns and villages, on lands that are not zoned. This action conflicts with national policy on the provision of social and affordable housing, in that the Part V provisions of the Act do not apply to unzoned land. The Institute feels that the Guidelines should explicitly state that Planning Authorities must not permit residential development (other than normal rural housing, and perhaps limited infill development of a few houses) on lands that are not zoned for residential purposes. While the Institute is cognisant of the need to allow as much freedom as possible to Planning Authorities to set their own Development Plan policies, it considers that the national policy in this area should take precedence, in the interests of the common good.

Q.10 Which design issues should receive particular attention in the proposed residential design guidance? (Chapter 5). In particular, we would welcome views on (a) mix of house types and (b) ancillary facilities.

It is considered that the general advice given in Chapter 5 has stood the test of time and has proven to be workable and quite robust in practice. It is therefore felt that these qualitative and quantitative standards should be retained, and that any design guidance should give best practice examples of their use.

However, the encouragement of a greater mix of housing type and design within new areas of housing needs to be encouraged. This may mean that individual applications, particularly of a large size, might need to have a set mix, but not smaller scale infill developments, where there is an adequate supply of larger houses already in the vicinity. However, it is important that, where this is the case, that the local area plan / adopted action/master plan should specify overall mixes and identify locations of various types of housing.

The Guidelines should distinguish between a mix of “house types” and a mix of “apartment types”. Currently, the Guidelines are vague on this point, since only the term “house types” is used, and it is often argued by developers that such requirements do not apply to apartments. This is an important sustainable development matter, in that it is necessary to avoid ‘mono-culture’ in apartment developments. A key issue that has been emerging in practice is the extent to which apartment developments have been dominated by one and two bedroom units, with few (if any) three-bedroomed units. This has significant implications for a sustainable mix of households in apartment schemes, with a lack of family households of more than one child. The Institute feels that, except in inner city areas (where family living is unlikely, for other social and environmental reasons, to be generally desired), apartment developments should be required to have a mix of unit types, with at least one third of larger units, which would be three bedroomed units, or two bedroomed units in excess of 90 sq metres in floor area, and with no more than one third of one-bedroomed units.

In term of ‘house’ types (as opposed to apartment types), there might not need to be any specific requirement, given that most outer suburban areas already are well supplied with larger three and four bedroomed houses. However, such a mix requirement is considered appropriate for apartment only developments, since in such suburban areas these tend to be differentiated residential markets.

Another factor that has caused many problems in practice, since the Guidelines were issued in 1999, has been the proliferation of single aspect units. Such units, other than in inner city areas, where they may be justified for streetscape reasons, tend to be unsustainable in general, particularly when their aspect is to the north or east, and where they form a significant proportion of a development. There may be some scope for a limited number of single aspect units in an apartment development, but there is no justification for single aspect houses in a housing estate, since such houses have no private open space, and generally provide a substandard form of development for families. The Institute considers that the revised Guidelines should caution about their use, and indicate that they should not be permitted except in limited circumstances, of apartment blocks, and where their orientation is to the south or west.

Another problem that has emerged in recent years with increased density is the lack of options within new housing on greenfield sites for those seeking larger houses to trade up into. The lack of such “executive” housing in appropriate built-up areas increases the pressure for individual houses in the countryside surrounding large towns and cities. The points made under Q.1 and Q. 2 also apply here. The Guidelines might provide (as noted under the response to Q8 above) that Planning Authorities be free to specify areas of lower density, to allow for local conditions and variations, in order to meet this need.

Other matters on which guidance should be given in Chapter 5 are passive solar design, and also the use of various energy saving products in house and estate design. (It is noted that other Government policy supports such products with grant aid, and it is important that the policies in one area support those in another).

In relation to ancillary facilities, it is considered that the provision of crèche facilities (as per the existing Childcare Guidelines) is necessary and appropriate, but that guidance should be provided on the best location for such facilities in new residential layouts. In particular, their location (along with local shops, clinics etc) on main through routes, so as to provide for sufficient passing trade to sustain them in the longer term, is desirable. It should be made clear that these facilities should be provided at the same time as the development of the residential developments, and at the expense of the developer.

Q.11 Is the advice in relation to car parking and road standards in need of revision? 5.9)

This is a key problem with the existing Guidelines in practice, since housing layouts, particularly those outside the major cities, has tended to be dictated by the road engineering standards. This has resulted in schemes that are dominated by the private motor car, and by set-backs and building lines, with wide roads and excessive curve radii at junctions, thereby resulting in pedestrian-unfriendly environments, and a lack of spatial cohesion, enclosure and sense of place.

Road design guidance needs to be revised to reflect both the revised standards referred to in the issue paper (particularly the Department’s new “Traffic Management Guidelines”), but also to give a sense of what is possible through good examples. In particular, the use of design guidance such as “Places, Streets and Movement”, and recent examples such as at Poundbury in the UK, should be promoted, as opposed to the more traditional engineering-based approaches typified by the now outdated document “Recommendations for Site Development Works for Housing Areas”, which is based on 1960’s era attitudes to low density “sprawl” suburbs, dominated by vehicular traffic.

The Institute therefore strongly feels that the Guidelines should require Planning Authorities to remove references to such outdated roads standards in their Development Plans, and should encourage the use of more modern design guidance.

Apart from this core issue, the Guidelines should provide detail on the provision of cycle paths within estates and new schemes. Too often, in practice, where cycle facilities are provided, they consist of a combined cycle lane/pedestrian path or a red stripe on the road. Such approaches are not successful and guidance to better models such as the DTO guide would give more strength to development management planners in seeking higher standards in design.

With regard to car parking the current standard of 1 - 2 spaces generally per unit, with the flexibility to reduce this in areas served by good public transport does not need significant revision. Good transport will encourage less use of the car, but many households will still purchase 1 car to cater for non-commute travel patterns, and therefore advocating a ratio of less than 1 space per unit is unrealistic.

In design terms, the Guidelines should indicate that underground car parking is the preferred option in higher density apartment developments, rather than surface car parking, thereby freeing up areas for quality communal open space. It should be explicitly stated that car parking areas, and internal roads, pavements etc., do not count towards the quantitative standard of communal open space provision.

Q.12 Are there issues relating to management of residential developments which are pertinent to the planning (rather than the legal) system (6.0)

The Guidelines should give policy direction on applying housing standards to be met both in relation to drainage, roads and open space. For housing schemes authorities should seek that the design submitted will meet “taking in charge” standards, even if a management company is proposed by the developer. This is particularly important for housing schemes which are not apartment blocks or small townhouse type infill. Incorporation of the recent Ministerial direction in this area in a practical way into Guidelines would be very useful to those working in this area.

However, it is considered that the provision of “gated developments”, where there is limited access, should not be encouraged, both on grounds of social policy, and also because the public realm (including public open spaces) are thereby diminished. In addition, where such gated developments are provided, the opportunities for pedestrian permeability through an area are restricted, and the overall cohesion of a community is damaged.

Section B- General Comments

The existing Residential Density Guidelines has, in its tone and tenure, a strong large city/town emphasis. It requires that increased densities would locate beside transport hubs, particularly public transport. However, in rural towns and villages such opportunities are limited. The key planning challenge is providing opportunities in villages and towns that compete with rural housing in ‘quality of life terms’.

The increased delivery of mass produced housing estates, most of which comply with the Density Guidelines, have impacted on people’s sense of place and ability to make local connections, with a growing trend towards people becoming disjointed from the community in which they live, particularly with long distance commuting patterns. Poor quality developments surrounding traditional towns have undermined the perception of Irish towns and the quality of life delivered.

Moreover, higher incomes, increased mobility and the ongoing preference of the countryside as an ‘idyll’ have contributed to the emerging trend of middle and upper income groups moving out of towns and purchasing houses vacated by rural dwellers who have benefited from the ability to build a second home. These images of the countryside combined with poor perceptions of towns has resulted in increasing numbers, particularly those who can afford to, leaving towns in favour of rural areas, a trend that is reflected in the Census figures, where rural areas surrounding towns continue to grow at rates in excess both of the town and other less directly accessible rural EDs. This issue has to be addressed in the revised Guidelines.

The Institute welcomes the indication from the Department that it is its intention to produce design guidance on internal space and on housing developments particularly. The need for design guidance on housing schemes is critical in a period where the housing stock of the country is doubling, and will be with us as a legacy for this century and the next. The Institute would urge that the process of producing this document is immediately progressed so that it can be put into the public domain and incorporated into the Density Guidelines or at a minimum, as a key supporting document to the revised Density Guidelines.

Many of the problems that have emerged in recent years with increased densities have been in relation to the lack of good design, with residential layouts being a numbers game of balancing gardens sizes and densities to achieve the saleable product, rather than thinking through the overall design principles and local context, and then working the design to achieve a high quality living environment through provision of good gardens and play space and avoiding overlooking. There is the added problem that the roads standards have tended to dominate the design of the residential estates, to the detriment of the overall design and quality of the places thus created.

There is a need for a much stronger emphasis on mixed use and mixed design both in the design of estates and the production of local area type plans. The reality within development management is that the vast majority of applications made to authorities are mono-use mass produced repetitive housing, which will comply with various standards but fail to create attractive new communities.

As part of this the Institute recommends that the Department when writing new Design Guidance either as part of the new Guidelines or as a separate document, that there are clear distinctions made between the different types of towns and cities and the need for different approaches to reflect the many different circumstances across the State. This document should also address the issue of phasing and the breaking up of large developments into more reasonably scaled schemes for the smaller towns and villages.

As noted above, the content of Chapter 3 requires significant re-casting. The section on plot ratios on city centres needs revision, with a division of cities from towns. Brownfield lands could be located anywhere and it is considered inappropriate to list this separately within this section. If the site is within an inner city area, then it should be classed as such. For example a disused cement works or agri-processing plant in a rural area or edge suburban area is brownfield based on the definition included in the document, but this is hardly meant to be included as a location appropriate for significantly high density uses.

Core city areas should not be capped for plot ratios in the same way that they are not for units per hectare and emphasis placed on design quality and context of the site instead, and on encouraging mixed uses to create vibrancy within developments.

There also needs to be more clarity regarding definitions of houses and apartments as there have been problems in this area, particularly in relation to 'hybrids'. All clarity is needed in stating whether standards such as parking, open space etc., apply to houses solely, or to both houses and apartments.

Conclusion

The Residential Density Guidelines are now over seven years old, and are in need of updating to reflect the growing complexity of this issue, and to incorporate the experiences gained through the delivery of the original Guidance. In preparing a revised document it is critical that this experience is incorporated, particularly that a broad brush cannot be applied to the whole country on this issue and the need for giving more detailed, appropriate and specific guidance on developments within medium and smaller towns and villages across the country. We would also urge the Department to consider in revising the Density Guidelines to take the opportunity to broaden the document so that it incorporates all element of housing developments discussed above into one integrated Residential Development Guidelines document.